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<p>Key results:</p> <ul style="list-style-type: none"> - Increase in amount of policy actions in support of civic space by multilateral and regional bodies or actors following ICNL engagement - Increase in amount of CSOs and other stakeholders that undertake activities to promote reform and/or that are better equipped to protect their organizations and operations following ICNL assistance - Increase in amount of CSOs and other stakeholders that undertake activities to address digital issues affecting civic space following ICNL assistance <p>Justification for support: Civil society plays a vital role in achieving a just, inclusive and sustainable future. A vibrant civil society can advance human rights, rule of law, digital democracy, gender equality, sustainable development, the interests of marginalized groups, and other publicly beneficial objectives. Since 2018, however, 84 countries have proposed or enacted more than 288 initiatives impacting civic space. Of these initiatives, 83% are restrictive. To counter this development, the Danish government has scaled up its response to this trend by launching a number of strategic interventions, including among others support to rapid response mechanisms, the Digital Democracy Initiative and ICNL is a global leader in promoting the right to assembly and association in developing countries with a strong and growing engagement in Africa.</p> <p>Major risks and challenges: Major risks include political tension undermining civic space, insecurity and conflicts in partner countries, global health emergencies, reprisals against partners, threats to partner safety, digital security as well as staff or management corruption. When working in particularly difficult environments, risk mitigation plans may include strategies for helping partners who are threatened with arrest or other harms as a result of their legitimate law reform advocacy. In other cases, risk mitigation plans may contemplate protection of a partner's documents, or compliance training to ensure that ICNL local staff and partners minimize their exposure to investigation or audit.</p>	<p>File No.</p>	24/02538																					
	<p>Country</p>	Interregional																					
	<p>Responsible Unit</p>	HUMCIV																					
	<p>Sector</p>	15150 (Democratic part. and civil society)																					
	<p>Partner</p>	International Centre for Not-for-Profit																					
	<p><i>DKK million</i></p>	2024	2025	2026	2027	Total																	
	<p>Commitment</p>	7,5	7,5			15																	
	<p>Projected disbursement</p>	3,75	3,75	3,75	3,75	15																	
	<p>Duration</p>	01.03.24 - 31.12.27																					
	<p>Previous grants</p>	Core grant 2021-2023 (11,25 mio. kr.)																					
	<p>Finance Act code</p>	06.33.01.11																					
	<p>Head of unit</p>	Birgitte Nygaard Markussen																					
	<p>Desk officer</p>	Christian Lyngsø Alvarez																					
	<p>Reviewed by CFO</p>	YES Karsten Ivar Schack																					
<p>Relevant SDGs</p> <table border="1"> <tr> <td> No Poverty</td> <td> No Hunger</td> <td> Good Health, Wellbeing</td> <td> Quality Education</td> <td> Gender Equality</td> <td> Clean Water, Sanitation</td> </tr> <tr> <td> Affordable Clean Energy</td> <td> Decent Jobs, Econ. Growth</td> <td> Industry, Innovation, Infrastructure</td> <td> Reduced Inequalities</td> <td> Sustainable Cities, Communities</td> <td> Responsible Consumption & Production</td> </tr> <tr> <td> Climate Action</td> <td> Life below Water</td> <td> Life on Land</td> <td> Peace & Justice, strong Inst.</td> <td> Partnerships for Goals</td> <td></td> </tr> </table>						 No Poverty	 No Hunger	 Good Health, Wellbeing	 Quality Education	 Gender Equality	 Clean Water, Sanitation	 Affordable Clean Energy	 Decent Jobs, Econ. Growth	 Industry, Innovation, Infrastructure	 Reduced Inequalities	 Sustainable Cities, Communities	 Responsible Consumption & Production	 Climate Action	 Life below Water	 Life on Land	 Peace & Justice, strong Inst.	 Partnerships for Goals	
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Strategic objective:

The development objective of the development cooperation among the parties is to promote an enabling environment for civil society and civic participation (civic space) in ODA-eligible countries and protect the freedoms of association, assembly, and expression, and the right to public participation, whether exercised online or offline.

Environment and climate targeting - Principal objective (100%); Significant objective (50%)

	Climate adaptation	Climate mitigation	Biodiversity	Other green/environment
Indicate 0, 50% or 100%	0 %	0 %	0 %	0 %
Total green budget (DKK)	0 DKK	0 DKK	0 DKK	0 DKK

Justification for choice of partner:

ICNL is the only global organization focused on the legal framework for civil society. Its unique mission is to protect and promote the freedoms of association, expression and assembly, thereby providing an enabling environment for civil society, civic participation and development cooperation worldwide. ICNL has through previous grants proven significant results in its work to influence global, multilateral norms and standards as well assisting local civil society partners in navigating and countering shrinking civic space.

Summary:

In accordance with Denmark's priority of promoting civic space in developing countries, Denmark's support to ICNL will enable the organisation to continue providing legal expertise and strategic guidance with respect to the laws that affect civil society. This includes country level work with civil society and other stakeholders to empower them to advocate for, and where possible, collaborate in creating an enabling legal framework for civil society. It also involves support to civil society to navigate in restricted environments, helping CSOs to maintain their critical services and international support. Finally, the support will enable ICNL to strengthen efforts to address dimensions of digital space, including access, inclusion, content moderation, data protection, disinformation, and surveillance, as well as AI.

Budget (engagement as defined in FMI):

Danish support to ICNL for the period 2024-2027	DKK 15 million
Total	DKK 15 million

Ministry of Foreign Affairs of Denmark

PROTECTING AND EXPANDING CIVIC SPACE

INTERNATIONAL CENTER FOR NOT-FOR-PROFIT LAW (ICNL)

Danish Project Support

ICNL

January 1, 2024 – December 31, 2027

December 2023

1. Introduction

The present project document outlines the background, rationale and justification, objectives and management arrangements for development cooperation concerning *Protecting and Expanding Civic Space* [January 1, 2024 – December 31, 2027] as agreed between the parties: The International Center for Not-for-Profit Law (ICNL) and the Ministry of Foreign Affairs of Denmark. The project document is an annex to the legal bilateral agreement with the implementing partner and constitutes an integral part hereof together with the documentation specified below.

“The Documentation” refers to the partner documentation for the supported intervention, which is *Protecting and Expanding Civic Space*.

2. Context, strategic considerations, rationale and justification [see Annex 1]

Context: Civil society plays a vital role in achieving a just, inclusive and sustainable future. A vibrant civil society can advance human rights, rule of law, digital democracy, gender equality, sustainable development, the interests of marginalized groups, and other publicly beneficial objectives. Around the world, however, the space for civil society is contracting. Restrictions on civil society take many forms. Some impede the ability of civil society organizations (CSOs) to form, operate, and sustain themselves. Others restrict civil society’s ability to engage in advocacy, use information and communication technology, and access international development cooperation. Governments have further engaged in practices such as mass surveillance, deploying military force against peaceful protesters, stigmatizing CSOs and activists, and using emergency powers as a pretext to compress civic space. Often these restrictions are deployed most harshly against already marginalized groups, including women, youth, LGBTQI persons, and indigenous people. According to ICNL’s most recent data, 84 countries have proposed or enacted more than 288 initiatives impacting civic space since 2018. Of these initiatives, 83% are restrictive.

To expand and protect civic space, ICNL must consider the following development challenges. **First**, international norms on the freedoms of association, assembly, and expression set the standard for governments’ treatment of civil society. They provide a framework for local civil society to claim their rights and a basis for inter-governmental dialogue when civic space is restricted. However, these human rights norms and the institutions that advance them are increasingly contested. It is therefore crucial to defend existing enabling norms and ensure the participation of civil society representatives in global and regional norm-setting spaces.

Second, civil society partners must address complex legal environment challenges at the national level. Specifically, governments propose legislative and regulatory measures that, if adopted, could constrain civic space. In more restrictive environments, governments may use existing law to target CSOs and their operations, funding, and organizational existence.

Third, digital technologies are reshaping civic space by providing new ways to exercise the freedoms of association, peaceful assembly, and expression — and new ways for governments and private actors to restrict those rights. The challenge is to make digital technologies work for, not against, democracy and human rights. The impediments in meeting this challenge are many. Both international norms and standards, as well as national law and policy, are struggling to keep up with the pace of technological change. Moreover, civil society partners lack fluency in digital technology and the pivotal importance of law in ensuring digital technologies are empowering and not stifling civil society.

Strategic considerations, rationale, and justification. ICNL seeks to promote an enabling environment for civil society and civic participation (civic space) in ODA-eligible countries and protect the freedoms of association, assembly, and expression, and the right to public participation, whether exercised online or offline.

Specifically, ICNL aims to empower civil society through engagements at the global, regional, and country levels, focusing exclusively on ODA-eligible countries. ICNL addresses cross-cutting themes that represent the most important challenges and opportunities for civil society partners. One priority theme is digital democracy – that is, making digital technologies work for, not against, democracy and human rights – which ICNL supports by addressing the legal dimension of digital space. ICNL implements inclusive programming that recognizes the particular civic space challenges facing women and girls, the LGBTI+ community, and other marginalized groups.

ICNL proposes the following three programming areas under this project.

I. Enhance international norms and engagement to safeguard civic space

International norms on the freedoms of association, assembly, and expression set the standard for governments' treatment of civil society and international institutions create opportunities for state-civil society engagement to safeguard civic space. However, these human rights norms and the institutions that advance them are increasingly contested. ICNL will defend existing enabling norms and identify new venues and processes to further the development of norms and expand engagement to safeguard civic space.

To enhance international norms and increase civil society engagement with UN and multilateral mechanisms, ICNL will:

- Engage the United Nations to better safeguard civic space, including through (1) more progressive resolutions affecting civic space in the UN Security Council, General Assembly, and Human Rights Council; (2) support for special rapporteurs focused on civic space (e.g., on freedom of expression, on freedom of association and peaceful assembly, on counterterrorism and human rights); and (3) greater civil society participation in UN mechanisms, including UN human rights and counterterrorism bodies.
- Seek additional opportunities to promote norms and civil society engagement through other multilateral institutions, such as the OECD-DAC, the Financial Action Task Force (FATF), the Open Government Partnership (OGP), the Extractive Industries Transparency Initiative (EITI), the Summit for Democracy and the UN Climate Change Conference (the COP).
- Empower regional human rights bodies, including the African Commission on Human and People's Rights and the Inter-American Human Rights Commission, to promote civic space norms among member states and support CSO partner efforts to deepen engagement with these institutions.

II. Enhance civil society's capacity to promote and protect civic space

National-level laws have a direct impact on civic space. ICNL therefore seeks to empower partners from civil society, government, and other sectors to promote favorable reforms and to prevent restrictions. In restrictive environments, CSOs are often subject to significant threats, including the threat of termination, harsh fines, and imprisonment of CSO leaders. ICNL provides support to CSOs, individual activists, and

donors, building their resilience to navigate the legal environment and protect themselves from civic space restrictions so they can continue to pursue their missions. The work of ICNL in this area will prioritize engagement with civil society organizations (CSOs) that advance the goals of climate justice, gender equality, and democracy and support marginalized communities.

To enhance civil society's capacity to promote and protect civic space, ICNL will:

- Strengthen civil society coordination, collaboration, and coalitions at the national, regional, and global levels, to address the legal environment for civil society more effectively.
- Increase civil society expertise on civil society legal issues (e.g., laws and policies affecting the formation and registration of CSOs, access to resources, CSO expression, assembly, and advocacy, and public participation) and on strategic responses to civic space challenges (e.g., legal reform advocacy, dialogue with government, strategic litigation, engagement with multilateral bodies, and how to navigate complex legal environments).
- Support ICNL's civil society monitoring network to maintain and enrich the [Civic Freedom Monitor](#) country reports.
- Share with local partners and the Danish Ministry of Foreign Affairs key resources and knowledge products on civic space, including learning points on effective ways to safeguard civic space.

III. Enhance civil society capacity and resilience to address digital issues affecting civic space

Digital technologies have emerged as tools to both enhance and constrain civic space. Moreover, civil society awareness of the impact of digital technologies is often poorly understood, as is the importance of enabling law and regulation to underpin the use of digital technologies. ICNL therefore seeks to empower civil society organizations to influence international standards and improve national-level laws so that all people can use the internet safely and meaningfully exercise their freedoms of expression, association, and assembly online. ICNL addresses multiple dimensions of digital space, including access, inclusion, content moderation, data protection, disinformation, and surveillance, as well as Artificial Intelligence (AI).

In addressing these (1) helping to create strong international, rights-enabling norms for digital rights; (2) enhancing meaningful civil society participation in the process of creating such norms; (3) strengthening the capacity of civil society partners from OECD-DAC countries to engage with the international community and their national governments on digital rights; and (4) strengthening the international and domestic legal frameworks and improving their implementation.

To enhance civil society capacity and resilience to address digital issues affecting civic space, ICNL will:

- Provide technical assistance and comparative expertise to civil society partners and government policymakers on legal and regulatory best practices relating to the digital issues of greatest concern in their countries, potentially including those listed above. ICNL's technical assistance to civil society partners will include guidance on strategic responses (e.g., legal reform advocacy, strategic litigation, and engagement with multilateral bodies) to address digital challenges. Specific modes of assistance may include legal analyses of draft laws and policies affecting digital technologies and civic space; financial assistance, through small grants, to civil society partners, including national and regional coalitions on digital rights, such as the newly created African Digital Rights

Hub; and the provision of comparative expertise, including through the dissemination of ICNL publications and knowledge products.

- Strengthen Denmark’s Digital Democracy Initiative (DDI) through strategic cooperation and collaboration with Global Focus, Access Now, CIVICUS, and other DDI participants. ICNL is already participating in DDI meetings and discussing potential support with Global Focus.
- Strengthen the development of rights-enabling norms and standards affecting digital space through ICNL’s role as a member of the Advisory Network of the Freedom Online Coalition (FOC), its position as co-lead of the Task Force on Artificial Intelligence and Human Rights (TFAIR), and participation in the FOC Task Forces on Trustworthy Information Online and on Internet Shutdowns and Gender Equality, as well as through the role of ICNL as a member of the Community of Democracies Working Group on Democracy and Technology. Depending on needs and opportunities, ICNL will continue to engage with international initiatives such as the draft *Convention on Artificial Intelligence, Human Rights, Democracy and the Rule of Law*, the UN’s Global Digital Compact, the Summit for the Future, and the draft UN Cybercrime Treaty. ICNL engagement will prioritize civil society participation in these processes and seek to ensure norms are consistent with international human rights law.
- Support CSO-government dialogue within the framework of the Open Government Partnership (OGP) National Action Plan process to strengthen the development and improve the implementation of digital civic space commitments by governments. ICNL will also explore how they can support the implementation of the recently adopted Donor Principles for Human Rights in the Digital Age.

Target Groups: The direct beneficiaries of ICNL’s work are civil society organizations and activists working in ODA-eligible countries. ICNL selects partners who share a vision of an enabling legal environment and willingness to lead reform and resiliency efforts. In some cases, they may be dedicated to law and/or human rights – e.g., the Zimbabwe Lawyers for Human Rights – but in many other cases, they may be CSOs dedicated to other issues, such as women’s rights, environmental justice, or health, who nonetheless recognize the importance of an enabling legal environment to all civil society work. Partners include both formally registered CSOs and informal groups, coalitions, and movements seeking progressive change and an improved legal framework for civil society.

ICNL’s methodology is to empower local leadership and capacity to effect reform. Regardless of the country context or the partner profile, ensuring local leadership and local ownership is core to ICNL’s approach. A recent evaluation of ICNL’s work found that ICNL’s partners “highly appreciate what they consider to be a rare respectful, responsive, and collaborative approach.”

Beyond civil society partners, ICNL’s work directly benefits those within governments, legislatures, academia, and the legal profession who champion reform and promote a more enabling environment for civil society. At the international level, ICNL partners include international organizations including the United Nations and its special rapporteurs, regional human rights bodies, and multilateral bodies (e.g., the OECD, Open Government Partnership, Financial Action Task Force, etc.). More broadly, ICNL’s work benefits all individuals who seek an open civic space to pursue social change.

Past Results:

(1) ICNL has demonstrated significant results in working to influence global, multilateral norms and standards. From 2018 through 2022, ICNL contributed to 296 initiatives of multilateral or regional bodies or actors that protect or enhance civic space. ICNL’s engagement influenced 170 policy actions in support of civic space by these multilateral or regional bodies or actors.

(2) Although the environment for progressive reform has been deteriorating in the past decade, ICNL nonetheless has seen notable successes. From 2018 through 2022, ICNL assistance contributed to 111

bills, laws, regulations, policies, or practices that better conformed to international legal standards and best practices. ICNL assistance helped to defeat 59 bills, laws, regulations, amendments or provisions that would have otherwise violated civil society freedoms. These achievements were accomplished in collaboration with partners; from 2018 through 2022, 2670 CSOs and other stakeholders undertook activities to promote reform after receiving ICNL assistance to do so.

Moreover, as authoritarianism has risen around the world and crackdowns on civil society have become more common, ICNL has significantly increased its resiliency, navigation, and protection work. From 2018 to 2022, ICNL assisted over 21,176 CSOs, foundations or other stakeholders to navigate their legal environments. Approximately 983 of these organizations represented marginalized groups, and ICNL assistance provided to these harder-to-reach communities has been growing every year as ICNL improves outreach and engagement.

A necessary ingredient for civil society success in advancing legal reform, countering threats, and navigating hostile legal environments is a strong knowledge base. ICNL seeks to strengthen that knowledge base. From 2018 through 2022, ICNL wrote, updated, or recorded 2326 research products, which were accessed by two million people. ICNL produces briefers, toolkits, and other resources at the international, regional, and local levels for the use of civil society proponents.

(3) ICNL has long recognized that the freedoms of association, assembly, and expression must be exercised and protected online as well as offline. As digital technologies have emerged, ICNL has recognized the potential risks and benefits of these technologies to civil society. The learning points highlighted above – with respect to international norms and country-level work – are relevant for ICNL’s work on digital space. In addition, ICNL has learned that digital technologies – and the legal framework that undergirds them – are often poorly understood. Civil society organizations and activists need to enhance their understanding of law and digital technologies in order to ensure that digital space is protected.

Holistic approach to strengthen links with Danish interests: ICNL’s project is directly relevant to Denmark’s development cooperation priorities. At the highest level, a strong and resilient civil society is critical “to create hope and help more people better where it is hardest.” ([Strategies and priorities \(um.dk\)](#)) Global challenges like poverty and inequality, conflict and displacement, irregular migration and fragility, as well as climate change and adaptation, cannot be solved without an enabling environment for civil society and civic participation. Governments alone cannot meet these challenges; an active civil society in ODA-eligible countries is fundamental.

Denmark acknowledges the value of a strong, diverse civil society and the central role it plays in promoting the Sustainable Development Goals (SDGs). ICNL’s work to improve the enabling environment for civic space ultimately provides a firmer foundation on which civil society groups can advance efforts relating to the SDGs more effectively. Moreover, ICNL’s work through this project will promote Danish core values concerning democracy and human rights. ICNL will contribute expertise, technical knowledge and experience not only to civil society actors, but also to governments, businesses, and multilateral bodies.

In addition, ICNL’s project will support the Digital Democracy Initiative (DDI). ICNL provided significant support to the Tech for Democracy initiative, working closely with Denmark and Global Focus. For example, ICNL participated in the Advisory Group to shepherd civil society input into the initiative, including the substance and structure of the *Tech for Democracy: Action Days*. ICNL has strong working relationships also with Access Now and CIVICUS. ICNL’s expertise on digital civic space can

provide meaningful added value to the DDI, particularly relating to the legal space for digital technologies and civil society engagement in shaping the legal framework for digital technologies.

Justification of project based on DAC criteria: Through this project, ICNL aims to address the closing civic space challenges affecting civil society and its ability to operate effectively. The use of law as a tool to stifle civil society impedes not only human rights organizations, but development and humanitarian organizations also. This project is therefore directly relevant to the effective functioning of civil society. Project impact will be measured through capacity gains of civil society organizations seeking to enhance and protect civic space and be felt more broadly by the civil society community. ICNL will build on its decades-long commitment to civic space and its experience in applying support strategies at the global, regional, and country level to empower civil society partners in OECD-DAC recipient countries. Lessons learned from past programming will help ensure the effective and efficient implementation of this project. ICNL will ensure programmatic coherence through its design and implementation. Each of the project objectives is mutually reinforcing. Taken together, ICNL will be well positioned to respond to legal threats and opportunities as they arise. This project will lead to sustainable results in the form of better capacitated civil society partners, educational materials that lead to a deeper knowledge base, and more progressive international norms and domestic laws.

Alignment with Danish cross-cutting priorities: ICNL's project objectives and working methodology are firmly rooted in a human rights-based approach. The project objectives seek to improve the operating space within which human rights – specifically, the freedoms of association, peaceful assembly, and expression – can be exercised. ICNL's working methods emphasize the full and inclusive participation of civil society in legal reform efforts. Moreover, ICNL prioritizes local ownership and leadership of all its initiatives. Finally, ICNL recognizes the intersectional nature of civic space challenges, whereby legal restrictions may have disproportionate impact on marginalized groups, women and youth, the LGBTI community, environmental activists, etc. Consequently, effective programmatic responses seek to ensure the inclusion of these groups and organizations.

3. Project Objective [see Annex 1, Summary of Strategic Framework]

The development objective of the development cooperation among the parties is to promote an enabling environment for civil society and civic participation (civic space) in ODA-eligible countries and protect the freedoms of association, assembly, and expression, and the right to public participation, whether exercised online or offline.

Specifically, ICNL aims to empower civil society through engagements at the global, regional, and country levels, focusing exclusively on OECD-DAC recipient countries. ICNL addresses cross-cutting themes that represent the most important challenges and opportunities for civil society partners. One priority theme is digital democracy – that is, making digital technologies work for, not against, democracy and human rights – which ICNL supports by addressing the legal dimension of digital space. ICNL implements inclusive programming that recognizes the particular civic space challenges facing women and girls, the LGBTI+ community, and other marginalized groups.

ICNL proposes the following three programming areas under this project:

- I. Enhance international norms and engagement to safeguard civic space;

- II. Enhance civil society’s capacity to promote and protect civic space; and
- III. Enhance civil society capacity and resilience to address digital issues affecting civic space.

4. Theory of change and key assumptions [See Annex 3]

Civil society encompasses activists, organizations, and movements working to address the complex challenges facing humanity. Advancing sustainable development goals, safeguarding democracy, expanding digital democracy, and protecting human rights requires the meaningful engagement of citizens, communities, and civil society. To fulfill its important role, civil society must have space to join together, speak out, and take action to make the world a better place: it needs an open and protected civic space. Through this Protecting and Expanding Civic Space project, ICNL will promote an enabling environment for civil society and civic participation (civic space) around the world and protect the freedoms of association, assembly, and expression, and the right to public participation, whether exercised online or offline. The scope of the project and target group is civil society actors operating in ODA-eligible countries. ICNL will pursue this program goal by engaging in three strategic areas of work, which are based on the following meso-level theories of change:

- **Enhancing international norms and engagement to safeguard civic space:** If there are progressive international norms and multilateral engagement on civic space issues, then civil society actors will be better able to encourage governments to protect civic space and increase accountability for government violations of civic space norms.
- **Enhancing civil society’s capacity to promote and protect civic space:** If civil society actors have a deeper understanding of civic space legal issues and how to address them, then they will develop more effective strategies and tactics to advance enabling legal reform, counter regulatory threats, and navigate hostile legal environments.
- **Enhancing civil society capacity and resilience to address digital issues affecting civic space:** If civil society actors have a deeper understanding of the legal environment affecting digital space, then they can help ensure the development of rights-respecting norms and laws governing digital technologies and strengthen their resilience in addressing digital space challenges.

5. Summary of the results framework [see Annex 3]

For results-based management, learning and reporting purposes Denmark will base the actual support on progress attained in the implementation of the project/programme as described in the documentation. Progress will be measured through ICNL’s results framework, which focuses on a limited number of key outcomes and corresponding outputs and their associated indicators.

Here below is the objective and outcome level framework. Attached please find the entire results framework in Annex 3 [Theory of Change, Scenario and Result Framework].

Project Title	Protecting and Expanding Civic Space
Overall Project Objective	To promote an enabling environment for civil society and civic participation in ODA-eligible countries and protect the freedoms of association, assembly, and expression, and the right to public participation, whether exercised online or offline.

Project Impact	The environment for civil society and civic participation is better protected through international and national rules that enable independent civil society and the exercise of the freedoms of association, assembly, and expression, online and offline.
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Project Objective 1	Enhance international norms and engagement to safeguard civic space		
Outcome 1	Improved international norms and increased civil society participation in multilateral processes to safeguard civic space		
Outcome indicator	# of policy actions in support of civic space by multilateral and regional bodies or actors following ICNL engagement		
Baseline	Year	22	In 2023, multilateral and regional bodies or actors took 22 policy actions in support of civic space following ICNL engagement.
Target	Year 4	42	Through this project, multilateral and regional bodies or actors will take an additional 20 policy actions in support of civic space following ICNL engagement, bringing the total to 42.

Project Objective 2	Enhance civil society capacity to promote and protect civic space		
Outcome 2	Civil society has increased capacity to advance legal reforms and navigate legal restrictions		
Outcome indicator	# of CSOs and other stakeholders that undertake activities to promote reform and/or that are better equipped to protect their organizations and operations following ICNL assistance		
Baseline	Year	1,878	In 2023, 1,878 CSOs and other stakeholders undertook activities to promote reform and/or were better equipped to protect their organizations and operations following ICNL assistance.
Target	Year 4	2,403	Through this project, an additional 525 CSOs and other stakeholders, of which 20% will represent marginalized constituencies, will promote reform and/or become better equipped to protect their organizations and operations following ICNL assistance, bring the total to 2,403.

Project Objective 3	Enhance civil society capacity and resilience to address digital issues affecting civic space		
Outcome 3	Civil society has increased capacity and resilience to address digital issues affecting civic space		
Outcome indicator	# of CSOs and other stakeholders that undertake activities to address digital issues affecting civic space following ICNL assistance		
Baseline	Year	0	ICNL will begin tracking the number of CSOs and other stakeholders that undertake activities to address digital issues affecting civic space following ICNL assistance upon project inception.
Target	Year 4	200	Through this project, a total of 200 CSOs and other stakeholders will undertake activities to address digital issues affecting civic space following ICNL assistance.

6. Project budget [see Annex 5]

The budget for this project totals 3,75 million DKK per year, or a total of 15 million DKK for the entire four-year project period (2024-2027). Here below is a summary budget prepared at the outcome level by year and in total. Attached is a summary budget at the output level. The grant will be provided in two two-year commitments of 7,5 million DKK, i.e. a commitment covering the period 2024-2025 and a commitment covering the period 2026-2027.

The second commitment of 7,5 million DKK is subject to approval of the Financial Act of 2025.

ICNL understand that Danish award funds must be spent solely on activities leading to the expected outputs and outcomes as agreed between the parties. ICNL is responsible for ensuring that the funds are spent in compliance with the agreement and with due consideration to economy, efficiency and effectiveness in achieving the results intended.

ICNL budget (summary)

International Center for Not-for-Profit Law (ICNL)	Year 1	Year 2	Year 3	Year 4	Total (DKK)
Outcome 1	1,586,816	1,408,240	1,134,466	1,162,053	5,291,575
Outcome 2	1,288,846	1,306,349	1,393,606	1,410,456	5,399,257
Outcome 3	874,338	1,035,411	1,221,928	1,177,491	4,309,168
Total	3,750,000	3,750,000	3,750,000	3,750,000	15,000,000
Revenues					
Ministry of Foreign Affairs of Denmark	3,750,000	3,750,000	3,750,000	3,750,000	15,000,000
Total	3,750,000	3,750,000	3,750,000	3,750,000	15,000,000

7. Institutional and Management arrangement [see Annex 6 and 7]

ICNL has strong administrative and management capacity that supports the technical expertise and allows ICNL to effectively implement global civic space programs. The small but capable staff includes experts in all aspects of the laws governing the freedoms of association, assembly, and expression. ICNL also has access to a worldwide network of international experts on a wide variety of topics relevant to civic space.

Over the past three years (2020-2022), ICNL has managed and implemented approximately 80 awards, ranging in amount from \$20,000 to \$9.8 million. The total annual budget during the past three years has grown from \$10.4 million (2020) to \$12.1 million (2021) to \$13.4 million (2022).

Management of the project: ICNL will create a **project coordination committee**, which will include ICNL's Vice President for Legal Affairs, Senior Legal Advisor & Coordinator of Multilateral Engagement, Senior Legal Advisor for Digital Programming, and ICNL's M&E coordinator. The coordination committee will meet on a quarterly basis to monitor progress to ensure delivery of outputs; address issues related to implementation, including developments of risks; draw lessons and ensure dissemination of learning; provide guidance on potential changes and/or adaptations to the project for the achievement of outcomes.

ICNL will also ensure coordination between this project and ICNL's other initiatives, as well as with related projects implemented by other development actors. Internally, ICNL will promote coordination and synergies with its other efforts at the global and national levels, including those focused on digital issues. In many cases, ICNL staff members involved in this project also oversee work under other projects, facilitating such coordination. In addition, ICNL will share information about project priorities via staff meetings, program team meetings, and bi-weekly reports. Externally, ICNL will share information about its work under this project with other development actors, including donors, at the country and global level.

Reporting schedule: ICNL will submit annual progress narrative reports and annual audited financial statements, on June 30 of each year, with the final narrative report and final audited financial report due on June 30, 2028. Thus, the reporting schedule will be:

- June 30, 2025 – deadline for the 2024 progress narrative report and 2024 audit.
- June 30, 2026 – deadline for the 2025 progress narrative report and 2025 audit.
- June 30, 2027 – deadline for the 2026 progress narrative report and 2026 audit.
- June 30, 2028 - deadline for the final narrative report and final audit.

Stock-taking schedule: In addition to annual reporting, ICNL will provide the Danish Ministry of Foreign Affairs with quarterly updates of ICNL’s civic space work at the global, regional, and country levels. These updates will keep the Ministry informed of ICNL’s programmatic progress and of civic space trends more generally. Quarterly updates will be shared on or about January 31, April 30, July 31, and October 31 of each year. ICNL will be available to meet with the Ministry upon request and to provide periodic updates regarding urgent issues as they may arise.

Learning strategy: Monitoring, evaluation, and learning (MEL) systems facilitate effective program implementation. ICNL has a detailed institutional MEL framework to evaluate the progress against the five strategic objectives. ICNL sets annual targets for its institutional indicators and collect and analyze data against them on a quarterly basis. These results are reviewed annually by ICNL staff, who then identify learning points and make program adjustments.

ICNL also monitors and evaluates work at the project level. The Results Framework set up for this project (referenced above) is designed to dovetail with ICNL’s institutional MEL framework. Learning and adaptation during implementation will be assessed by the project coordination committee on a quarterly basis.

Upon project inception, ICNL will develop a detailed MEL Plan, which will provide a description of each indicator, baseline data and targets, data sources, and frequency of collection. Where relevant, ICNL will disaggregate data by country, issue, sector, and marginalized groups—including women, youth, indigenous peoples, LGBTQ persons, and people with disabilities.

The MEL process will be participatory, and subgrantees will monitor outputs and outcomes related to their activities, reporting to ICNL on a quarterly basis. Routine discussions with subgrantees and beneficiaries on program results through the life of the project will allow ICNL and consortium partners to evaluate successes and lessons to be learned, adapting activities and approaches as appropriate to increase impact and reach.

In addition, ICNL will prioritize peer learning, information sharing, and the co-generation of knowledge products among its network of civil society leaders, lawyers, academics, government officials, and others who work to protect and promote civic space throughout its project activities. For example, ICNL supports thematic and regional civil society hubs and coalitions that bring together relevant partners and facilitate the sharing of experience across countries.

ICNL policies: ICNL has several policies and provisions that address anti-corruption, including ICNL's personnel manual, conflict of interest policy, and procurement policy. ICNL has several policies and provisions that address ethical issues and provide guidelines on ethical conduct, including ICNL’s personnel manual, anti-discrimination and harassment policy, and conflict of interest policy. ICNL has several policies and provisions that address gender equality, including ICNL’s equal opportunity employment policy, anti-discrimination and harassment policy, and diversity, equity, and inclusion statement. Please find attached Annex 6 [List of Supplementary Materials].

Communication Plan: ICNL has developed a plan for communicating project results; please find attached Annex 7 [Plan for Communication of Results].

The Humanitarian Action, Civil Society and Engagement Unit in the Ministry of Foreign Affairs of Denmark shall have the right to carry out any technical or financial supervision mission that is considered necessary to monitor the implementation of the project/programme.

After the termination of the project support, the Humanitarian Action, Civil Society and Engagement Unit in the Ministry of Foreign Affairs of Denmark reserves the right to carry out evaluations in accordance with this article.

8. Financial Management, planning and reporting [to be completed]

A budget of 15,000,000 DKK is pledged to the project, which will be disbursed in annual tranches of DKK 3,750,000 per year. With reference to section 6, the commitment for the final two years of the project are subject to parliamentary approval.

The finance team of ICNL ensures that ICNL's financial transactions, policies, and procedures comply with U.S. and international generally accepted accounting practices and funder regulations as well as the financial management guidelines of the Danish MFA. ICNL undergoes an annual audit by an independent certified public accountant. In all cases, the audit reports have noted no findings, and the auditors categorize ICNL as a "low-risk auditee."

ICNL will submit to the Danish MFA audited accounts covering the previous financial year by 30 June each year. A narrative report outlining key activities, achievements, and progress towards the above-mentioned outputs and outcomes will be submitted on an annual basis before 30 June each year.

The audits are subject to the requirements in the Danish MFA's [General Guidelines for Financial management](#) and Audit Instruction annex where, among others, it is a requirement that the audit includes compliance and performance audit as part of the audit management letter. The audit should at least include the same level of detail as in the project budget attached to the project document and include a break-down of the operating costs charged to the project.

Both parties will strive for full alignment of the Danish support to the implementing partner rules and procedures, while respecting sound international principles for financial management and reporting.

9. Risk Management [see Annex 4]

ICNL has a strong institutional culture of monitoring risks. For purposes of this project, ICNL has identified and analyzed the contextual, programmatic, and institutional risk factors, as follows:

- **Contextual risk factors:** political tension that undermines work at the multilateral level; natural disasters; insecurity or conflict in program countries; and the rise of a global health emergency that triggers government responses threatening civic space.
- **Programmatic risk factors:** reduced opportunity to enhance civic space; partners' ability to operate impeded; low partner engagement; discrimination by project partners or governments; and the enactment of health-related travel or meeting restrictions.
- **Institutional risk factors:** threats to partner security; staff safety during program implementation; digital security; disinformation or character attacks; staff or management

fraud or corruption; staff or management conflict of interest; partner mismanagement or misuse of funds; compliance failure; safeguarding failure; and reputational risks.

For each risk, ICNL has assessed its likelihood of occurring, its potential impact, ICNL's risk response, any residual risk, and background to the assessment. ICNL will discuss the nature and status of these risks with the Danish Ministry of Foreign Affairs on at least an annual basis (risk management chart attached in Annex 4 [Risk Management]).

10. Closure

The project is designed so that it can contribute significantly to the capacity of civil society partners and other relevant stakeholders within the existing four-year period (2024-2027).

The formal closure of the project shall consist of a final report covering the full project period, to be delivered 5 months after the end of the project. Final audits, closure of accounts, and return of unspent funds and accrued interest should be undertaken within the first six months of 2028.

Annexes:

Annex 1: Context Analysis

Annex 2: Partner Assessment

Annex 3: Theory of Change, Scenario and Result Framework

Annex 4: Risk Management

Annex 5: Budget Details

Annex 6: List of Supplementary Materials

Annex 7: Plan for Communication of Results

Annex 8: Process Action Plan for Implementation

Annex 9: Quality Assurance Checklist

Annex 1. Context, Strategic Considerations, Rationale and Justification

Summary of Main Issues and Development Challenges

Civil society plays a vital role in achieving a just, inclusive and sustainable future. A vibrant civil society can advance human rights, rule of law, digital democracy, gender equality, sustainable development, the interests of marginalized groups, and other publicly beneficial objectives. Around the world, however, the space for civil society is contracting. Restrictions on civil society take many forms. Some impede the ability of civil society organizations (CSOs) to form, operate, and sustain themselves. Others restrict civil society's ability to engage in advocacy, use information and communication technology, and access international development cooperation. Governments have further engaged in practices such as mass surveillance, deploying military force against peaceful protesters, stigmatizing CSOs and activists, and using emergency powers as a pretext to compress civic space. Often these restrictions are deployed most harshly against already marginalized groups, including women, youth, LGBTIQI persons, and indigenous people. According to ICNL's most recent data, 84 countries have proposed or enacted more than 288 initiatives impacting civic space since 2018. Of these initiatives, 83% are restrictive.

To expand and protect civic space, we must consider the following development challenges.

First, international norms on the freedoms of association, assembly, and expression set the standard for governments' treatment of civil society. They provide a framework for local civil society to claim their rights and a basis for inter-governmental dialogue when civic space is restricted. However, these human rights norms and the institutions that advance them are increasingly contested. Authoritarian states, notably including Russia and China, increasingly attempt to replace protective norms with restrictive ones and repurpose multilateral bodies to promote an alternative to the global liberal order established after World War II. It is therefore crucial to defend existing enabling norms and ensure the participation of Global Majority civil society representatives in global and regional norm-setting spaces.

Second, civil society partners must address complex legal environment challenges at the national level. Specifically, governments propose legislative and regulatory measures that, if adopted, could constrain civic space. In more restrictive environments, governments may use existing law to target CSOs and their operations, funding, and organizational existence. Even in countries with generally enabling legal environments, CSOs and their partners may struggle to understand and comply with complex laws and regulations.

In these circumstances, it is crucial to (a) empower civil society partners to respond to legislative and regulatory threats and, where possible, to advance favorable reform; and (b) help strengthen civil society resilience so organizations can safely navigate their legal environments and operate effectively in the face of restrictions. ICNL assistance programs are designed to be flexible, enabling our partners to respond to rapidly changing environments. Our work supports CSOs that advance the goals of democracy, digital space, climate justice, gender equality, and an enabling legal environment. Our work seeks to strengthen CSOs that support marginalized communities, including LGBTIQI people, migrants, and youth.

Moreover, to respond effectively to civic space challenges, a sound knowledge base is crucial. ICNL maintains monitoring tools that capture the latest developments affecting the legal environment for civil society. ICNL supports evidence and solutions-based research to inform policy discussions and

support advocacy efforts. ICNL undertakes research on laws affecting civic space, philanthropy, and other related issues. We provide research assistance to key multilateral or regional bodies, prepare white papers to support reform efforts, and publish “know your rights” guides for civil society.

Third, digital technologies are reshaping civic space by providing new ways to exercise the freedoms of association, peaceful assembly, and expression — and new ways for governments and private actors to restrict those rights. The challenge is to make digital technologies work for, not against, democracy and human rights. The impediments in meeting this challenge are many. Both international norms and standards, as well as national law and policy, are struggling to keep up with the pace of technological change. Moreover, civil society partners lack fluency in digital technology and the pivotal importance of law in ensuring digital technologies are empowering and not stifling civil society.

To overcome these impediments and meet the broader challenge, ICNL conducts research to collect best practices and identify challenges related to technology and civic space. We work closely with our global network of partners to develop international, regional, and national norms and standards so that new technologies protect basic freedoms and build an enabling environment for civil society. We also aim to enhance the fluency of civil society actors in technology so that they can participate meaningfully in crafting policies that affect civic space.

Summary of Strategic Framework

ICNL seeks to promote an enabling environment for civil society and civic participation (civic space) around the world and protect the freedoms of association, assembly, and expression, and the right to public participation, whether exercised online or offline.

Specifically, ICNL aims to empower civil society through engagements at the global, regional, and country levels, focusing exclusively on OECD-DAC recipient countries. We address cross-cutting themes that represent the most important challenges and opportunities for civil society partners. One priority theme is digital democracy – that is, making digital technologies work for, not against, democracy and human rights – which ICNL supports by addressing the legal dimension of digital space. We implement inclusive programming that recognizes the particular civic space challenges facing women and girls, the LGBTI+ community, and other marginalized groups.

ICNL proposes the following three programming areas under this project.

I. Enhance international norms and engagement to safeguard civic space

International norms on the freedoms of association, assembly, and expression set the standard for governments’ treatment of civil society and international institutions create opportunities for state-civil society engagement to safeguard civic space. However, these human rights norms and the institutions that advance them are increasingly contested. ICNL will defend existing enabling norms and identify new venues and processes to further the development of norms and expand engagement to safeguard civic space.

To enhance international norms and increase civil society engagement with UN and multilateral mechanisms, ICNL will:

- Engage the United Nations to better safeguard civic space, including through (1) more progressive resolutions affecting civic space in the UN Security Council, General Assembly, and Human Rights Council; (2) support for special rapporteurs focused on civic space (e.g., on freedom of expression, on freedom of association and peaceful assembly, on counterterrorism and human rights); and (3) greater civil society participation in UN mechanisms, including UN human rights and counterterrorism bodies.
- Seek additional opportunities to promote norms and civil society engagement through other multilateral institutions, such as the OECD-DAC, the Financial Action Task Force (FATF), the Open Government Partnership (OGP), the Extractive Industries Transparency Initiative (EITI), and the UN Climate Change Conference (the COP).
- Empower regional human rights bodies, including the African Commission on Human and People's Rights and the Inter-American Human Rights Commission, to promote civic space norms among member states and support CSO partner efforts to deepen engagement with these institutions.

II. Enhance civil society's capacity to promote and protect civic space

National-level laws have a direct impact on civic space. ICNL therefore seeks to empower our partners from civil society, government, and other sectors to promote favorable reforms and to prevent restrictions. In restrictive environments, CSOs are often subject to significant threats, including the threat of termination, harsh fines, and imprisonment of CSO leaders. ICNL provides support to CSOs, individual activists, and donors, building their resilience to navigate the legal environment and protect themselves from civic space restrictions so they can continue to pursue their missions. Our work in this area will prioritize engagement with civil society organizations (CSOs) that advance the goals of climate justice, gender equality, and democracy and support marginalized communities.

To enhance civil society's capacity to promote and protect civic space, ICNL will:

- Strengthen civil society coordination, collaboration, and coalitions at the national, regional, and global levels, to address the legal environment for civil society more effectively.
- Increase civil society expertise on civil society legal issues (e.g., laws and policies affecting the formation and registration of CSOs, access to resources, CSO expression, assembly, and advocacy, and public participation) and on strategic responses to civic space challenges (e.g., legal reform advocacy, dialogue with government, strategic litigation, engagement with multilateral bodies, and how to navigate complex legal environments).
- Support ICNL's civil society monitoring network to maintain and enrich the [Civic Freedom Monitor](#) country reports.
- Share with our local partners and the Danish Ministry of Foreign Affairs key resources and knowledge products on civic space, including learning points on effective ways to safeguard civic space.

III. Enhance civil society capacity and resilience to address digital issues affecting civic space

Digital technologies have emerged as tools to both enhance and constrain civic space. Moreover, civil society awareness of the impact of digital technologies is often poorly understood, as is the importance of enabling law and regulation to underpin the use of digital technologies. ICNL therefore seeks to empower civil society organizations to influence international standards and improve national-level laws so that all people can use the internet safely and meaningfully exercise their freedoms of expression, association, and assembly online. ICNL addresses multiple dimensions of digital space, including access, inclusion, content moderation, data protection, disinformation, and surveillance, as well as Artificial Intelligence (AI).

In addressing these (1) helping to create strong international, rights-enabling norms for digital rights; (2) enhancing meaningful civil society participation in the process of creating such norms; (3) strengthening the capacity of civil society partners from OECD-DAC countries to engage with the international community and their national governments on digital rights; and (4) strengthening the international and domestic legal frameworks and improving their implementation.

To enhance civil society capacity and resilience to address digital issues affecting civic space, ICNL will:

- Provide technical assistance and comparative expertise to civil society partners and government policymakers on legal and regulatory best practices relating to the digital issues of greatest concern in their countries, potentially including those listed above. ICNL's technical assistance to civil society partners will include guidance on strategic responses (e.g., legal reform advocacy, strategic litigation, and engagement with multilateral bodies) to address digital challenges. Specific modes of assistance may include legal analyses of draft laws and policies affecting digital technologies and civic space; financial assistance, through small grants, to civil society partners, including national and regional coalitions on digital rights, such as the newly created African Digital Rights Hub; and the provision of comparative expertise, including through the dissemination of ICNL publications and knowledge products.
- Strengthen Denmark's Digital Democracy Initiative (DDI) through strategic cooperation and collaboration with Globalt Fokus, Access Now, CIVICUS, and other DDI participants. ICNL is already participating in DDI meetings and discussing potential support with Globalt Fokus.
- Strengthen the development of rights-enabling norms and standards affecting digital space through ICNL's role as a member of the Advisory Network of the Freedom Online Coalition (FOC), our position as co-lead of the Task Force on Artificial Intelligence and Human Rights (TFAIR), and our participation in the FOC Task Forces on Trustworthy Information Online and on Internet Shutdowns and Gender Equality, as well as through our role as a member of the Community of Democracies Working Group on Democracy and Technology. Depending on needs and opportunities, ICNL will continue to engage with international initiatives such as the draft *Convention on Artificial Intelligence, Human Rights, Democracy and the Rule of Law*, the UN's Global Digital Compact, the Summit for the Future, and the draft UN Cybercrime Treaty. ICNL engagement will prioritize civil society participation in these processes and seek to ensure norms are consistent with international human rights law.
- Support CSO-government dialogue within the framework of the Open Government Partnership (OGP) National Action Plan process to strengthen the development and improve the implementation of digital civic space commitments by governments. ICNL will also explore how we can support the implementation of the recently adopted Donor Principles for Human Rights in the Digital Age.

Target Groups and Key Stakeholders

The direct beneficiaries of ICNL’s work are civil society organizations and activists working in OECD-DAC recipient countries. Beyond civil society partners, ICNL’s work directly benefits those within governments, legislatures, academia, and the legal profession who champion reform and promote a more enabling environment for civil society. At the international level, ICNL partners include international organizations including the United Nations and its special rapporteurs, regional human rights bodies, and multilateral bodies (e.g., the OECD, Open Government Partnership, Financial Action Task Force, etc.). More broadly, ICNL’s work benefits all individuals who seek an open civic space to pursue social change.

ICNL’s methodology is to empower local leadership and capacity to improve the legal operating environment for civil society. Our partners are selected based on shared values and a shared vision for an improved civil society legal environment. They often include human rights organizations and defenders, but also organizations and activists addressing digital rights, climate change, women’s rights, humanitarian, and a range of other social justice causes. ICNL deliberately seeks to include women and girls’ organizations, youth, and vulnerable groups, including those representing indigenous persons and LGBTI persons, among others.

Indeed, ICNL routinely seeks to raise awareness among key constituencies to help defend civic space through both sectoral outreach to groups disproportionately impacted by civic space restrictions and through general outreach to the public at large. We support youth engagement through university-based educational initiatives. We reach out to the business community—especially to those working in the technology, extractive or financial sectors that have outsized impact on civil society—to increase their support of civic space. By engaging with like-minded governments, donors, CSOs and other stakeholders, ICNL elevates issues of civic space in support of movement-building.

Past Results and Lessons Learned

(1) ICNL has demonstrated significant results in working to influence global, multilateral norms and standards. From 2018 through 2022, ICNL contributed to 296 initiatives of multilateral or regional bodies or actors that protect or enhance civic space. ICNL’s engagement influenced 170 policy actions in support of civic space by these multilateral or regional bodies or actors.

ICNL has learned that civil society participation in the setting of international norms and standards improves the content of those norms and standards; increases the legitimacy of the multilateral bodies; and enhances the sense of ownership within civil society of international norms. In addition, ICNL recognizes that to be relevant to civic space at the country level, there must be intentional efforts to ‘domesticate’ international norms, by ensuring that civil society rely on international norms in their advocacy and dialogue with government. The importance of civil society participation in norm-setting and building the bridge between global/regional norms and country level work are fundamental to ICNL’s work in this area.

Examples of ICNL’s experience in influencing and applying international norms include the following:

- In 2021, ICNL, as a member of the OECD-DAC CSO Reference Group, worked with CSO partners and like-minded governments to encourage the adoption of the DAC Recommendation on Enabling Civil Society in Development Co-operation and Humanitarian

Assistance, the DAC's first legal instrument on civic space. The Recommendation sets out a practical blueprint, endorsed by the world's major donor countries, for how to enable civil society in development cooperation and humanitarian assistance—providing guidance that donor governments, partner governments, civil society and other stakeholders can use to remove constraints on civil society and enable the exercise of civic freedoms.

- In 2020, ICNL supported the UN Human Rights Committee to develop General Comment No. 37 by providing expert advice and facilitating partner input to the drafting process. This General Comment, the Committee's first comprehensive guidance on the right of peaceful assembly, sets out progressive standards on a range of issues, including protecting online and private assemblies, denouncing internet shutdowns that impede the right to assemble on and offline, and supporting peaceful assemblies to advance LGBTQI rights.
- ICNL has supported the research, drafting and implementation of reports from the UN Special Rapporteurs on the rights to freedom of peaceful assembly and association (FoAA); on the promotion and protection of freedom of opinion and expression; on Human Rights and Countering-Terrorism. These reports set forth more enabling standards that can support civil society advocacy on topics such as the exercise of assembly and association rights in connection with digital space, climate justice, sustainable development, and women human rights defenders (WHRDs); the impact of disinformation, internet shutdowns or other digital technologies on fundamental freedoms; and the impact of counterterrorism measures and bodies on civic space.

(2) Although the environment for progressive reform has been deteriorating in the past decade, ICNL nonetheless has seen notable successes. From 2018 through 2022, ICNL assistance contributed to 111 bills, laws, regulations, policies, or practices that better conformed to international legal standards and best practices. ICNL assistance helped to defeat 59 bills, laws, regulations, amendments or provisions that would have otherwise violated civil society freedoms. These achievements were accomplished in collaboration with our partners; from 2018 through 2022, 2670 CSOs and other stakeholders undertook activities to promote reform after receiving ICNL assistance to do so.

Moreover, as authoritarianism has risen around the world and crackdowns on civil society have become more common, ICNL has significantly increased its resiliency, navigation, and protection work. From 2018 to 2022, we assisted over 21,176 CSOs, foundations or other stakeholders to navigate their legal environments. Approximately 983 of these organizations represented marginalized groups, and ICNL assistance provided to these harder-to-reach communities has been growing every year as we improve our outreach and engagement.

In working at the country level, ICNL has learned that successful initiatives depend on local leadership. ICNL therefore seeks to empower, not supplant local partners. In supporting enabling law reform efforts, ICNL recognizes the need to act quickly when reform windows open, supporting reform champions within civil society and government and facilitating dialogue between the sectors. In countering regulatory restrictions, ICNL understands the importance of a multi-pronged response, which strengthens domestic advocacy efforts through support for broader coalitions, through increased expertise, and by leveraging multilateral bodies. In supporting civil society to operate within hostile legal environments, ICNL has learned that civil society capacity to navigate the legal

environment benefit from a variety of approaches, including training, toolkits, and legal support, as well as coalition building and knowledge exchange.

Here are a few examples of our country-level successes:

- In 2022, the **Nigerian** government eliminated cumbersome anti-money laundering and countering financing of terrorism-related reporting obligations for CSOs through the adoption of the Money Laundering (Prevention and Prohibition) Act, 2022 and the Terrorism (Prevention and Prohibition) Act 2022. The new laws were adopted after six years of advocacy by local partner CSOs who, with ICNL expertise and support, engaged in sustained dialogue with government institutions. By building institutional relationships with key government actors and enhancing local civil society capacity through trainings and compliance clinics, ICNL's civil society partners effectively pushed back on the perception of CSOs as conduits for money-laundering or terrorism financing (ML/TF) while simultaneously demonstrating the threats posed to CSOs when they are treated as entities at higher-risk for ML/TF abuse.
- In 2021, **El Salvador's** legislature introduced a draft Foreign Agents Registration Law. The draft law would have required most CSOs to register as "foreign agents" and place a statement on all communications that they are speaking on behalf of their foreign directors. Working alongside local partners, ICNL raised awareness of this threat with concerned governments and funders active in El Salvador by rapidly producing legal analysis and talking points. ICNL also supported a local partner to conduct a webinar on the bill that was viewed over 450 times in just the first 24 hours. This international and domestic advocacy contributed to the Salvadoran government's decision to halt debate on the dangerous bill.
- In **Pakistan**, ICNL provided support to the Community World Service Asia (CWSA) to set up a CSO help facility and associated services to assist CSOs navigate the regulatory requirements needed to access foreign funding. Through this project, CWSA assisted over 260 CSOs in navigating these regulatory requirements, thereby enabling them to access foreign funding and financial services. The project also led to the formation of an ongoing partnership between CWSA and Pakistan's Economic Affairs Division.
- In 2019, ICNL worked closely with local **Ugandan** partners to counter emerging threats to free expression. After the government suspended 39 journalists and producers for reporting on the arrest of an opposition parliamentarian, ICNL supported our local partner to reactivate and expand a civil society coalition. The coalition acted in solidarity with a local media fraternity to successfully challenge the suspensions, and the journalists and producers were allowed back on air. The coalition also joined hands with Ugandan artists and entertainers to successfully advocate for withdrawal of a draft law that would have imposed unreasonable conditions on artists and entertainment—for example, requiring song lyrics and scripts to be vetted by authorities.

A necessary ingredient for civil society success in advancing legal reform, countering threats, and navigating hostile legal environments is a strong knowledge base. ICNL seeks to strengthen that knowledge base. From 2018 through 2022, ICNL wrote, updated, or recorded 2326 research products, which were accessed by two million people. ICNL produces briefers, toolkits, and other resources at the international, regional, and local levels for the use of civil society proponents. A few examples of such research products produced in 2022 and 2021 include:

- The [Civic Freedom Monitor](#) includes 55 country notes, detailing the key civic space challenges faced by civil society.
- The [FOAA Online: Resources for Litigation and Advocacy](#) provides easily accessible legal arguments and standards for FoAA under international law that lawyers, activists, and judges can use to protect these freedoms.
- ICNL's [Legal Responses to Disinformation – a Policy Prospectus](#) explores regulatory responses to limit the spread of disinformation online while respecting freedom of expression.
- ICNL's [Renewable Energy & Civic Space: Civil Society's Role in a Just Transition](#) examines the challenges and opportunities presented by the energy transition for civil society and promotes enhanced civil society participation to ensure a more effective and just energy transition.
- ICNL assisted the UN special rapporteur on the rights to freedom of association and assembly in developing [Women and FoAA: A Defender's Toolkit](#), which supports civil society efforts to advocate for women's full enjoyment of the rights to FoAA.

(3) ICNL has long recognized that the freedoms of association, assembly, and expression must be exercised and protected online as well as offline. As digital technologies have emerged, ICNL has recognized the potential risks and benefits of these technologies to civil society. The learning points highlighted above – with respect to international norms and country-level work – are relevant for ICNL's work on digital space. In addition, ICNL has learned that digital technologies – and the legal framework that undergirds them – are often poorly understood. Civil society organizations and activists need to enhance their understanding of law and digital technologies in order to ensure that digital space is protected.

Examples of ICNL's work in this area include the following:

- ICNL supported Denmark's Tech for Democracy initiative through collaboration with representatives of the Danish Ministry of Foreign Affairs and with Globalt Fokus. ICNL then worked with the Advisory Group, led by Globalt Fokus, to shepherd civil society input into the initiative, including the substance and structure of the Tech for Democracy: Action Days.
- ICNL currently serves as a member of the Advisory Network of the Freedom Online Coalition (FOC). In addition, we serve as co-lead of the Task Force on Artificial Intelligence and Human Rights (TFAIR) and participation in the FOC Task Forces on Trustworthy Information Online and on Internet Shutdowns and Gender Equality. Moreover, we are a member of the Community of Democracies Working Group on Democracy and Technology.
- ICNL supported the UN Special Rapporteur on the rights to freedom of peaceful assembly and of association in preparing his 2019 report in 2019 on freedom of association in the digital age and his 2021 report on the impact of internet shutdowns in relation to peaceful protests. In both cases, ICNL helped ensure civil society dialogue with the special rapporteur.
- ICNL enhances the fluency of civic space defenders with digital technologies and empowers them to advance legal reform affecting digital technologies. In 2019, 2021, and 2023, ICNL and Stanford-GDPi completed three iterations of the Tech Camp for Civic Space Defenders. Civil society participants expanded their understanding of technologies affecting civic space, how policies regulating these technologies impact civic space, and how new technologies can expand, rather than restrict, civic space.

- ICNL provides analyses of draft laws, policies, and rules affecting digital rights and civic space. In recent years, we have assisted partners in addressing cybercrime laws (Iraq, Tanzania, Zambia, Zimbabwe); fake information laws (Kyrgyzstan); telecom laws (DRC); anti-deepfake law (Philippines); communications laws (Mozambique); data protection acts (Bangladesh); SIM card and social media registration (Philippines); licensing for posting videos (Nepal); AI regulation (Brazil); and national Internet gateways (Cambodia).
- ICNL contributed significantly to the creation of CivicSpace.Tech, which is an interactive resource to provide civic activists with overviews of 14 types of emerging digital technologies and related issues, including their potential benefits, risks, and best practices for their use.

Holistic Approach to Strengthen Links with Danish Interests

ICNL routinely seeks to strengthen links with Danish priorities and organizations in several ways. First, ICNL provides quarterly updates to Denmark on its work on civic space at the global, regional, and country levels. We encourage these updates to be shared with relevant Danish colleagues within the Ministry of Foreign Affairs and at the embassy level in relevant countries. In addition, we provide legal analyses of draft laws that may be of concern to Denmark, as well as publications that may be of interest. Second, we seek to connect with Danish colleagues at the country level. As but one example, ICNL's consultant in Bangladesh has invited Denmark to attend Dhaka-based workshops on civic space issues (e.g., on the recently adopted Cyber Security Act 2023) and has agreed to provide a briefing to the Danish embassy. ICNL staff traveling in country may also meet with Danish colleagues. Third, ICNL has worked closely with both Global Focus and with ActionAid Denmark on civic space issues. We have enabled the participation of civil society representatives from OECD-DAC recipient countries in Copenhagen events, including the People Power Conference conducted in September 2023. We have conducted discussions and trainings on how to respond to civic space challenges for both Global Focus and ActionAid Denmark, as well as for CISU.

Justification of Project Based on DAC Criteria

Through this project, ICNL aims to address the closing civic space challenges affecting civil society and its ability to operate effectively. The use of law as a tool to stifle civil society impedes not only human rights organizations, but development and humanitarian organizations also. This project is therefore directly relevant to the effective functioning of civil society.

Project impact will be measured through capacity gains of civil society organizations seeking to enhance and protect civic space and be felt more broadly by the civil society community.

ICNL will build on its decades-long commitment to civic space and its experience in applying support strategies at the global, regional, and country level to empower civil society partners in OECD-DAC recipient countries. Lessons learned from past programming will help ensure the effective and efficient implementation of this project.

ICNL will ensure programmatic coherence through its design and implementation. Each of the project objectives is mutually reinforcing. Taken together, we will be well positioned to respond to legal threats and opportunities as they arise.

This project will lead to sustainable results in the form of better capacitated civil society partners, educational materials that lead to a deeper knowledge base, and more progressive international norms and domestic laws.

Alignment with Danish Cross-cutting Priorities

ICNL's project objectives and working methodology are firmly rooted in a human rights-based approach. The project objectives seek to improve the operating space within which human rights – specifically, the freedoms of association, peaceful assembly, and expression – can be exercised. ICNL's working methods emphasize the full and inclusive participation of civil society in legal reform efforts. Moreover, ICNL prioritizes local ownership and leadership of all its initiatives. Finally, we recognize the intersectional nature of civic space challenges, whereby legal restrictions may have disproportionate impact on marginalized groups, women and youth, the LGBTI community, environmental activists, etc. Consequently, effective programmatic responses seek to ensure the inclusion of these groups and organizations.

ANNEX 2: PARTNER ASSESSMENT

Partner Assessment – ICNL

1. Brief presentation of ICNL

The International Center for Not-for-Profit Law works to improve the legal environment for civil society, philanthropy, and public participation around the world. ICNL was founded in 1992 as one of the first organizations to focus on the legal environment aspect of civic space. It works with partners from civil society, government, and the international community developing long-term relationships to advance reforms. As the only global organization focused on the laws affecting civil society, philanthropy, and public participation, ICNL provides unique expertise.

The five strategic objectives in ICNL's strategic plan for 2023-2028 are:

- Enhance international norms and engagement to safeguard civic space;
- Empower local partners to promote and protect civic space at the national level;
- Strengthen civil society resilience;
- Advance research and information sharing on civic space; and
- Raise awareness to protect civic space.

ICNL has demonstrated significant results in working to influence global, multilateral norms and standards. From 2018 through 2022, ICNL contributed to 296 initiatives of multilateral or regional bodies or actors that protect or enhance civic space. ICNL's engagement influenced 170 policy actions in support of civic space by these multilateral or regional bodies or actors. ICNL's working methods emphasize the full and inclusive participation of civil society in legal reform efforts. ICNL prioritizes local ownership and leadership of all its initiatives (see annex 1).

ICNL strategic objectives align strongly with priorities in Denmark's strategy for development cooperation and the work of Danish civil society. ICNL works closely together with the Danish MFA, including Danish representations at country level as well as at the multilateral level. ICNL has worked closely with both Global Focus and ActionAid Denmark on civic space issues. They have enabled the participation of civil society representatives from OECD-DAC recipient countries in Copenhagen events, including the People Power Conference conducted in September 2023 and conducted discussions and trainings on how to respond to civic space challenges for both Global Focus and ActionAid Denmark, as well as for CISU. Furthermore, ICNL cooperated closely with the Danish MFA on the Tech for Democracy initiative and will strengthen focus on digital civic space and seek avenues for collaboration under the Danish Digital Democracy Initiative.

2. Summary of partner capacity assessment

ICNL has demonstrated significant results in working to influence global, multilateral norms and standards. From 2018 through 2022, ICNL contributed to 296 initiatives of multilateral or regional bodies or actors that protect or enhance civic space. ICNL’s engagement influenced 170 policy actions in support of civic space by these multilateral or regional bodies or actors.

From 2018 through 2022, ICNL assistance contributed to 111 bills, laws, regulations, policies, or practices that better conformed to international legal standards and best practices. ICNL assistance helped to defeat 59 bills, laws, regulations, amendments or provisions that would have otherwise violated civil society freedoms. These achievements were accomplished in collaboration with our partners; from 2018 through 2022, 2670 CSOs and other stakeholders undertook activities to promote reform after receiving ICNL assistance to do so (See annex 1).

The capacity assessment furthermore draws on the evaluation of ICNL undertaken in 2023, commissioned by the core donors, including Denmark, and on SIDA’s internal system and control review report from 2023 carried out by KPMG. Both reports had positive conclusions as well as recommendations for improvement. The internal system and control review report commissioned by SIDA overall concludes that ICNL is fit to manage the grant from SIDA which is similar to the grant of Denmark. The MFA is in close dialogue with ICNL with regards to following up on the recommendations from the evaluation and the internal systems and control review.

3. Summary of key partner features

Name of Partner	Core business <i>What is the main business, interest and goal of the partner?</i>	Importance <i>How important is the project/programme for the partner's activity-level (Low, medium high)?</i>	Influence <i>How much influence does the partner have over the project/programme (low, medium, high)?</i>	Contribution <i>What will be the partner's main contribution?</i>	Capacity <i>What are the main issues emerging from the assessment of the partner's capacity?</i>	Exit strategy <i>What is the strategy for exiting the partnership?</i>
ICNL	<p><i>ICNL aims to empower civil society through engagements at the global, regional, and country levels.</i></p> <p><i>Will do so through technical expertise, capacity building of local CSO's and sub-grants to local CSO's.</i></p> <p><i>ICNL operates as an 'honest broker' between civil society, governments and multilateral bodies on a demand driven basis to be able to respond to</i></p>	<p><i>Low.</i></p> <p><i>ICNL has an annual revenue of USD 10 mio. of which the Danish support will account for a small part.</i></p>	<p><i>Medium.</i></p> <p><i>Denmark engages proactively in a joint donor coordination group coordinating efforts with ICNL and like-minded donors.</i></p>	<p><i>ICNL is a global leader in the efforts for civic space.</i></p> <p><i>ICNL will convene the voice of civil society at the multilateral level, and bring their expertise to the national and local level to empower local civil society organisations to work for a rights-respecting legal environment for civil society participation in societies.</i></p>	<p><i>Strength: High degree of technical expertise, established partnerships, experienced in managing small grants.</i></p> <p><i>Weaknesses: Lacks guidelines to partners on how to manage and document potential irregularities. Lacks partnership policy.</i></p> <p><i>Opportunities: Strong donor coordination, e.g. capacity assessment and</i></p>	<p><i>No special requirements after end of contract.</i></p>

	<i>developments in civic space as they arise. See annex 1 and project document.</i>				<i>audit sharing, streamlining of compliance requirements.</i> <i>Threats: Uncertain whether ICNL will adopt partnership policy.</i>	
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Annex 3. Theory of Change

Civil society encompasses activists, organizations, and movements working to address the complex challenges facing humanity. Advancing sustainable development goals, safeguarding democracy, expanding digital democracy, and protecting human rights requires the meaningful engagement of citizens, communities, and civil society. To fulfill its important role, civil society must have space to join together, speak out, and take action to make the world a better place: it needs an open and protected civic space. Through this Protecting and Expanding Civic Space project, ICNL will promote an enabling environment for civil society and civic participation (civic space) in ODA-eligible countries and protect the freedoms of association, assembly, and expression, and the right to public participation, whether exercised online or offline. We will pursue this project goal by engaging in three strategic areas of work, which are based on the following meso-level theories of change:

- **Enhancing international norms and engagement to safeguard civic space:** If there are progressive international norms and multilateral engagement on civic space issues, then civil society actors will be better able to encourage governments to protect civic space and increase accountability for government violations of civic space norms.
- **Enhancing civil society’s capacity to promote and protect civic space:** If civil society actors have a deeper understanding of civic space legal issues and how to address them, then they will develop more effective strategies and tactics to advance enabling legal reform, counter regulatory threats, and navigate hostile legal environments.
- **Enhancing civil society capacity and resilience to address digital issues affecting civic space:** If civil society actors have a deeper understanding of the legal environment affecting digital space, then they can help ensure the development of rights-respecting norms and laws governing digital technologies and strengthen their resilience in addressing digital space challenges.

Enhancing international norms and engagement to safeguard civic space: Multilateral bodies set international standards that affect civic space and serve as an advocacy tool for civil society actors to hold governments accountable. Progressive international norms provide guidance to governments that are willing to adopt enabling legislation and make it harder for autocratic governments to argue that restrictive legislation complies with international standards. At the same time, however, human rights norms and the institutions that advance them are increasingly contested. Authoritarian states increasingly attempt to replace protective norms with restrictive ones and repurpose multilateral bodies to promote an alternative to the global rules-based order. Engagement on norms and with multilateral bodies has never been more crucial. ICNL will share expertise and support our partners’ engagement with relevant multilateral bodies to help ensure that the standards they issue protect and promote space. ICNL recognizes the risks that multilateral bodies may limit space for civil society participation; that the increasingly assertive role of authoritarian actors may stymie progressive norms or even result in the retrenchment of norms; and that democratic allies may weaken their own support for multilateral processes. These risks, however, underscore the importance of this project’s efforts to safeguard civic space within global and regional multilateral spaces. Supporting partner engagement with relevant multilateral bodies amplifies civil society voice and influence within those bodies and enables multilateral bodies to develop international standards that take account of civil society realities and address civil society needs more effectively. If there are progressive international norms and

multilateral engagement on civic space issues, then civil society actors at the national level will be better able to encourage governments to protect civic space and increase accountability for government violations of civic space norms.

Enhancing civil society’s capacity to promote and protect civic space: Since its inception in 1992, ICNL has supported partners to promote and protect civic space in over 100 countries spanning virtually every political, economic, and legal system. Since 2018, ICNL’s technical assistance has helped improve over 120 bills, laws, regulations, policies, or practices, and helped defeat 70 provisions that would have restricted civil society’s operating environment. In the past five years, we assisted over 24,000 CSOs, foundations or other stakeholders to navigate their legal environments. Based on this experience, ICNL recognizes that skilled and engaged champions for civic space can create or leverage opportunities for reform and advocate against restrictive reforms and practices within a country; and that building CSOs’ capacities to navigate complex legal requirements and protect themselves from regulatory and other threats can preserve civic space, even in restrictive environments. ICNL will provide local civil society actors with financial and technical support on a range of civil society legal issues that they can use in their advocacy and employ to increase their resilience. ICNL will also strengthen civil society coordination, collaboration, and coalitions so that civil society actors can work together and learn from each other about how to promote and protect civic space. ICNL’s assistance will vary depending on the country context and will be designed in consultation with local partners. ICNL recognizes the risks that partners may prioritize other issues aside from the operating environment; that engagement in reform and resilience may trigger increased government attention and, in some cases, harassment; and that the active engagement of marginalized groups, including LGBTI and women’s groups, among others, may give risk to targeted threats against these groups. ICNL is therefore careful to approach partnership in ways that are most appropriate for local organizations. In relatively open contexts, ICNL may play a more visible role, even liaising directly with government counterparts (e.g., Ghana). In hostile, contexts, ICNL works exclusively with civil society and ensures confidential communications (e.g., Myanmar). Regardless, however, the goal is to provide our partners with a stronger base for effective advocacy and dialogue. If civil society actors have a deeper understanding of civic space legal issues and how to address them, then they will develop more effective strategies and tactics to advance enabling legal reform, counter regulatory threats, and navigate hostile legal environments.

Enhancing civil society capacity and resilience to address digital issues affecting civic space: According to the OECD, “digital transformation is altering civic space... At the same time, across the world, digital technologies are being exploited to silence, surveil and manipulate civil society, as well as to express extremist views or hate speech.” We will increase local civil society actors’ understanding of how these technologies affect civic space, so they can advance enabling legal reform, counter regulatory threats, and navigate digital restrictions. In addition, as multilateral bodies, such as the Freedom Online Coalition, develop norms and standards affecting digital space, we will support efforts to ensure that they reflect human rights standards and enable and protect civic rights. ICNL recognizes the risks that CSO engagement in legal reform and advocacy could lead to government attention and harassment; and that multilateral norm-setting processes may be closed to civil society. Nonetheless, civil society actors can shape the national and international legal environment only where they have sufficient understanding of digital technologies and effective regulatory pathways to help ensure that technology works for democracy and human rights. If civil society actors have a deeper understanding of the legal environment affecting digital space, then they can help ensure the development of rights-respecting norms and laws governing digital technologies and strengthen their resilience in addressing digital space challenges.

Results Framework

Project Title	Protecting and Expanding Civic Space
Overall Project Objective	To promote an enabling environment for civil society and civic participation in ODA-eligible countries and protect the freedoms of association, assembly, and expression, and the right to public participation, whether exercised online or offline.
Project Impact	The environment for civil society and civic participation is better protected through international and national rules that enable independent civil society and the exercise of the freedoms of association, assembly, and expression, online and offline.

Project Objective 1	Enhance international norms and engagement to safeguard civic space	
Outcome 1	Improved international norms and increased civil society participation in multilateral processes to safeguard civic space	
Outcome indicator	# of policy actions in support of civic space by multilateral and regional bodies or actors following ICNL engagement	
Baseline	Year 22	In 2023, multilateral and regional bodies or actors took 22 policy actions in support of civic space following ICNL engagement.
Target	Year 4 42	Through this project, multilateral and regional bodies or actors will take an additional 20 policy actions in support of civic space following ICNL engagement, bringing the total to 42.

Output 1.1	ICNL provides expertise to multilateral processes to safeguard civic space	
Output indicator	# of contributions by ICNL to multilateral initiatives to protect or enhance civic space	
Baseline	Year 0	ICNL will begin tracking the number of contributions we make to multilateral initiatives to protect or enhance civic space upon project inception.
Target	Year 1 25	During the first year of the project, ICNL will make 25 contributions to multilateral initiatives to protect or enhance civic space.
Target	Year 2 50	During the second year of the project, ICNL will make an additional 25 contributions to multilateral initiatives to protect or enhance civic space, bringing the total to 50.
Target	Year 3 70	During the third year of the project, ICNL will make an additional 20 contributions to multilateral initiatives to protect or enhance civic space, bringing the total to 70.
Target	Year 4 90	During the final year of the project, ICNL will make an additional 20 contributions to multilateral initiatives to protect or enhance civic space, bringing the total to 90.

Output 1.2	CSO partners engage in multilateral processes to protect or enhance civic space	
Output indicator	# of local civil society actors that participate in multilateral mechanisms or initiatives to protect or enhance civic space with ICNL assistance	
Baseline	Year 0	ICNL will begin tracking the number of local civil society actors that participate in multilateral mechanisms or initiatives to protect or enhance civic space with ICNL assistance upon project inception
Target	Year 1 100	During the first year of the project, 100 local civil society actors will participate in multilateral mechanisms or initiatives to protect or enhance civic space with ICNL assistance.
Target	Year 2 200	During the second year of the project, an additional 100 local civil society actors will participate in multilateral mechanisms or initiatives to protect or enhance civic space with ICNL assistance, bringing the total to 200.
Target	Year 3 250	During the third year of the project, an additional 50 local civil society actors will participate in multilateral mechanisms or initiatives to protect or enhance civic space with ICNL assistance, bringing the total to 250.
Target	Year 4 300	During the final year of the project, an additional 50 local civil society actors will participate in multilateral mechanisms or initiatives to protect or enhance civic space with ICNL assistance, bringing the total to 300.

Output 1.3	ICNL and its partners produce knowledge products related to international norms and civil society participation in multilateral processes to safeguard civic space	
Output indicator	# of ICNL knowledge products related to international norms and civil society participation in multilateral processes to safeguard civic space that are written/updated/recorded and disseminated.	
Baseline	Year 0	ICNL will begin tracking the number of knowledge products related to international norms and civil society participation in multilateral processes to safeguard civic space upon project inception.
Target	Year 1 10	During the first year of the project, 10 ICNL knowledge products related to international norms and civil society participation in multilateral processes to safeguard civic space will be written/updated/recorded and disseminated.
Target	Year 2 18	During the second year of the project, an additional 8 ICNL knowledge products related to international norms and civil society participation in multilateral processes to safeguard civic space will be written/updated/recorded and disseminated, bringing the total to 18.

Target	Year 3	26	During the third year of the project, an additional 6 ICNL knowledge products related to international norms and civil society participation in multilateral processes to safeguard civic space will be written/updated/recorded and disseminated, bringing the total to 26.
Target	Year 4	32	During the final year of the project, an additional 6 ICNL knowledge products related to international norms and civil society participation in multilateral processes to safeguard civic space will be written/updated/recorded and disseminated, bringing the total to 32.

Project Objective 2		Enhance civil society capacity to promote and protect civic space	
Outcome 2		Civil society has increased capacity to advance legal reforms and navigate legal restrictions	
Outcome indicator		# of CSOs and other stakeholders that undertake activities to promote reform and/or that are better equipped to protect their organizations and operations following ICNL assistance	
Baseline	Year	1,878	In 2023, 1,878 CSOs and other stakeholders undertook activities to promote reform and/or were better equipped to protect their organizations and operations following ICNL assistance.
Target	Year 4	2,403	Through this project, an additional 525 CSOs and other stakeholders, of which 20% will represent marginalized constituencies, will promote reform and/or become better equipped to protect their organizations and operations following ICNL assistance, bring the total to 2,403.

Output 2.1		Civil society benefits from technical and financial assistance on civil society legal environment issues	
Output indicator		# of CSOs and other stakeholders that receive ICNL assistance to build their capacity to advance legal reform and/or navigate CSO legal environments	
Baseline	Year	6,000	In 2023, 5,500 CSOs and other stakeholders received ICNL assistance to build their capacity to advance legal reform and/or navigate CSO legal environments.
Target	Year 1	6,250	During the first year of the project, 250 CSOs and other stakeholders will receive ICNL assistance to build their capacity to advance legal reform and/or navigate CSO legal environments, bringing the total to 6,250.
Target	Year 2	6,500	During the second year of the project, an additional 250 CSOs and other stakeholders will receive ICNL assistance to build their capacity to advance legal reform and/or navigate CSO legal environments, bringing the total to 6,500.
Target	Year 3	6,750	During the third year of the project, an additional 250 CSOs and other stakeholders will receive ICNL assistance to build their capacity to advance legal reform and/or navigate CSO legal environments, bringing the total to 6,750.
Target	Year 4	7,000	During the final year of the project, an additional 250 CSOs and other stakeholders will receive ICNL assistance to build their capacity to advance legal reform and/or navigate CSO legal environments, bringing the total to 7,000.

Output 2.2		Informational resources on civic space issues and legal reform and resilience strategies produced	
Output indicator		# of ICNL knowledge products on civic space issues and legal reform and resilience strategies that are written/updated/recorded and disseminated	
Baseline	Year	0	ICNL will begin tracking the number of knowledge products on civic space issues and legal reform and resilience strategies that are written/updated/recorded and disseminated upon project inception.
Target	Year 1	12	During the first year of the project, 12 knowledge products on civic space issues and legal reform and resilience strategies will be written/updated/recorded and disseminated.
Target	Year 2	24	During the second year of the project, an additional 12 knowledge products on civic space issues and legal reform and resilience strategies will be written/updated/recorded and disseminated, bringing the total to 24.
Target	Year 3	36	During the third year of the project, an additional 12 knowledge products on civic space issues and legal reform and resilience strategies will be written/updated/recorded and disseminated, bringing the total to 36.
Target	Year 4	48	During the final year of the project, an additional 12 knowledge products on civic space issues and legal reform and resilience strategies will be written/updated/recorded and disseminated, bringing the total to 48.

Project Objective 3		Enhance civil society capacity and resilience to address digital issues affecting civic space	
Outcome 3		Civil society has increased capacity and resilience to address digital issues affecting civic space	
Outcome indicator		# of CSOs and other stakeholders that undertake activities to address digital issues affecting civic space following ICNL assistance	
Baseline	Year	0	ICNL will begin tracking the number of CSOs and other stakeholders that undertake activities to address digital issues affecting civic space following ICNL assistance upon project inception.
Target	Year 4	200	Through this project, a total of 200 CSOs and other stakeholders will undertake activities to address digital issues affecting civic space following ICNL assistance.

Output 3.1		Civil society benefits from technical and financial assistance on digital issues affecting civic space	
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Output indicator		# of CSOs and other stakeholders that receive ICNL assistance to build their capacity to address digital issues affecting civic space	
Baseline	Year	0	ICNL will begin tracking the number of CSOs and other stakeholders that receive ICNL assistance to build their capacity to address digital issues affecting civic space.
Target	Year 1	75	During the first year of the project, 75 CSOs will receive ICNL assistance to build their capacity to address digital issues affecting civic space.
Target	Year 2	175	During the second year of the project, an additional 100 CSOs will receive ICNL assistance to build their capacity to address digital issues affecting civic space, bringing the total to 175.
Target	Year 3	300	During the third year of the project, an additional 125 CSOs will receive ICNL assistance to build their capacity to address digital issues affecting civic space, bringing the total to 300.
Target	Year 4	425	During the final year of the project, an additional 125 CSOs will receive ICNL assistance to build their capacity to address digital issues affecting civic space, bringing the total to 425.

Output 3.2		Civil society contributes to multilateral processes on digital issues affecting civic space, including DDI	
Output indicator		# of contributions by ICNL to multilateral initiatives on digital issues affecting civic space or the implementation of existing digital civic space commitments	
Baseline	Year	0	ICNL will begin tracking the number of contributions it makes to multilateral initiatives on digital issues affecting civic space or the implementation of existing digital civic space commitments upon project inception
Target	Year 1	20	During the first year of the project, ICNL will make 20 contributions to multilateral initiatives on digital issues affecting civic space or the implementation of existing digital civic space commitments.
Target	Year 2	40	During the second year of the project, ICNL will make an additional 20 contributions to multilateral initiatives on digital issues affecting civic space or the implementation of existing digital civic space commitments, bringing the total to 40.
Target	Year 3	60	During the third year of the project, ICNL will make an additional 20 contributions to multilateral initiatives on digital issues affecting civic space or the implementation of existing digital civic space commitments, bringing the total to 60.
Target	Year 4	80	During the final year of the project, ICNL will make an additional 20 contributions to multilateral initiatives on digital issues affecting civic space or the implementation of existing digital civic space commitments, bringing the total to 80.

ANNEX 4: RISK MANAGEMENT

Contextual risks

Risk Factor	Likelihood	Impact	Risk response	Residual risk	Background to assessment
Political tension undermines work at multilateral level	Likely	Minor	ICNL will adjust activities according to the changing political situation and/or will explore alternative multilateral fora.	Multilateral political tensions may increase the cost or slow the pace of multilateral work or the use of alternative fora may lessen impact.	Contestation of civic space norms has risen in some multilateral fora in recent years. ICNL has succeeded in navigating these changing circumstances and in doing so, has learned to work within and around political constraints and/or seek out alternative, more favorable multilateral spaces to continue civic space work.
Natural disasters	Likely	Major	ICNL will work with local partners to adjust activity plans, timelines, and working methodologies (including remote engagement), as appropriate in response to exigent circumstances.	Unexpected natural disasters may still disrupt virtual programming due to internet connectivity and communication issues.	Natural disasters divert civil society and political attention away from civic space issues and make it more difficult for partners to operate. Risk might be low to moderate in any given country, but high probability of occurrence in one or more of the countries.
Insecurity or conflict in program countries	Likely	Major	ICNL will prioritize programming that avoids in-person engagements in areas at heightened risk of violence and allows for remote engagement and the application of safety protocols.	Unexpected increases in conflict or severity of security situation can still disrupt virtual programming. Physical safety of personnel can become at risk.	Terrorist attacks, coups, and wars divert civil society and political attention away from civic space issues and make it more difficult for partners to operate freely due to safety concerns and restrictions. Risk may be low in any given country, but medium probability of occurrence in one or more of the countries.
Global health emergency and government responses threatening civic space	Unlikely	Major	ICNL will ensure flexible programming and support local partners to adapt to changing circumstances. We will also launch programming to address restrictive threats.	Civic space becomes more constrained due to government emergency responses.	Government responses to global health emergencies, as seen in the past with COVID-19, may create a restrictive operating environment for civic space.

Programmatic risks

Risk Factor	Likelihood	Impact	Risk response	Residual risk	Background to assessment
Reduced opportunity to enhance civic space	Likely	Major	ICNL will identify and build relationships with potential government allies and promote collaboration across civil society. ICNL will also work to create international and regional norms to counter restrictive tendencies and guide national policy.	Less opportunity and political will to build relationships across civil society reduces partners' ability to advocate for policy changes.	Opportunity to enhance civic space may decrease due to a decline in political will. Rising authoritarianism in one or more countries or introduction of new enforcement of restrictive laws may further reduce opportunity for reform.
Partners' ability to operate is impeded	Likely	Minor	ICNL monitors developments in all countries of operation and ensure preparedness to navigate new legislation and help our partners do the same. Where restrictions make it difficult to operate safely within a country, ICNL assists partners to navigate the hostile legal environment more effectively.	Project funding flows or activities will be discouraged or prevented by government authorities.	The legal environment impedes partners' ability to operate or access funding or technical support.
Low partner engagement	Unlikely	Minor	ICNL uses established relationships, broad networks, and credibility with CSOs to generate and maintain interest and engagement in our work. We work through our partners to develop relationships with other stakeholders.	Difficulty in connecting with potential local partners may slow a particular program in its initial stages.	Lack of interest from civil society may deter participation in activities to protect and promote civic space. This could be driven by a variety of factors, including the presence of other priorities or lack of resources to engage.

Discrimination by project partners or governments	Likely	Major	ICNL will reach out to partners representing and with close connections to marginalized and vulnerable communities to design and implement project activities. ICNL and partners will, where appropriate and necessary, implement accessibility measures to promote full participation by groups experiencing discrimination.	Partners or governments discriminate against marginalized groups directly or indirectly and cause external harm and/or prevent them from taking part in program activities. Exclusion causes activities to be less meaningful and effective.	ICNL works to promote open civic space for all, but in many project countries, discrimination can prevent the impact of our work from benefiting people subject to discrimination. Discrimination can take many forms and can be perpetrated by both nonstate and state actors.
Health-related travel or meeting restrictions enacted	Unlikely	Minor	If travel restrictions occur during the program period, new protocols drawing on lessons learned from the Covid period will be deployed and partners will be encouraged to limit in-person events to areas where restrictions have been lifted (with implementation of all necessary safety precautions).	Opportunities for engagement and convenings are limited to virtual interactions for potentially indefinite period of time.	Restrictions related to health emergencies may affect our ability to travel or organize in-person convenings and require shift of programming activities to virtual or hybrid formats.

Institutional risks for ICNL

Risk Factor	Likelihood	Impact	Risk response	Residual risk	Background to assessment
Threats to partner security	Likely	Major	ICNL will conduct country-level risk assessments and assess and mitigate safety risks to partners on an ongoing basis, including through physical and digital security measures. We have resources and partnerships that can help ensure partners' physical safety or legal risk is addressed.	If key partners are the target of attacks that render them unable to continue work or that discourage their continued participation, this may compromise partners' well-being and may also affect the ability to carry out project activities.	Partners may face investigation, harassment, stigmatization, threats, retaliation, and even arrest and prosecution as a result of participation in project activities.
Staff safety during program implementation	Unlikely	Major	Staff and supervisors monitor country information before traveling to determine if travel is safe and ICNL offers security training and travel insurance. We have a travel policy and special risk policy and maintain emergency contact forms for staff. If necessary, we continue work through remote means.	Safety risks are minimized by our policies and risk assessment processes but still present when staff travel. Minor incidents, such as thefts, would have minimal institutional or programmatic effect, but extreme incidents, such as kidnapping, could significantly affect our ability to operate.	Staff traveling to implement ICNL programs are exposed to heightened risks to their physical security, including theft, surveillance, and kidnapping.
Digital security (ICNL has implemented strong digital security measures, but partners may have varying levels of digital protection in place)	Likely	Major	ICNL mitigates digital security risk through 24/7 monitoring, periodic review of all systems, state-of-the-art security protocols, and ongoing staff training. ICNL will assess the digital security context in each country with activities under this project and will assist partners as needed to review and implement digital security protocols.	Should digital assets of ICNL or partners be compromised, it could result in ICNL's or partners' sensitive information being exposed, leading to threats to the safety of staff and partners, and disruptions to activities	Breaches of or damage to digital assets of ICNL or partners (e.g., accounts, servers, or devices) may result from actions from actions by bad actors or natural disasters.
Disinformation or character attacks	Likely	Minor	ICNL's Communications Team will undertake an appropriate response, which may include reaching out directly to key partners or issuing a public statement explaining the situation.	Despite ICNL's response, an effective disinformation or character attack could result in lingering questions about credibility and trustworthiness.	Malign actors discredit ICNL or its partners by spreading false information smears.
Staff or management fraud or corruption	Unlikely	Major	ICNL has strict policies and oversight in place to prevent staff or management fraud or corruption.	Although unlikely because of strict internal policies and oversight measures, an incident of fraud could create significant reputational or financial damage to the organization.	Fraud and corruption may stem from the intentional misuse or misdirection of funds by staff or management.
Staff or management	Unlikely	Minor	ICNL has a conflict-of-interest policy applicable to all staff,	An undisclosed conflict of interest could result in	Staff or management make decisions that are not in the

conflict of interest			significant consultants, and Board and Advisory Council members, that requires annual disclosure of potential conflicts and protects against self-dealing and other conflicts.	overpayment of goods or real or perceived questions about ICNL's organizational integrity.	best interest of ICNL as a result of competing interests.
Partner mismanagement or misuse of funds	Unlikely	Minor	ICNL has both practices and accounting policies that call for strict monitoring and control of funds received by partner organizations.	Misuse or mismanagement of funds could endanger the program.	Partners do not use their funds for their intended purpose.
Compliance failure	Unlikely	Minor	ICNL conducts an annual review of compliance issues and policies. We also conduct strategic reviews when issues arise outside of the annual review process. To ensure financial compliance, ICNL undergoes external audits.	Some internal compliance violation cases could result in severe consequences.	Failure to comply with external laws, regulations, funding agreements, or internal policies exposes the organization to legal risks.
Safeguarding failure	Unlikely	Major	ICNL has a Safeguarding Policy that requires mandatory reporting of any concerns or suspicions regarding safeguarding violations. ICNL conducts biennial assessments of its safeguarding risks and contractually requires grantees and consultants to comply.	Safeguarding failures could result in harm to people, including marginalized groups and other beneficiaries of assistance.	Project activities may generate a risk of harm or abuse to staff, partners, participants, or beneficiaries.

Institutional risks for the Danish MFA

Risk Factor	Likelihood	Impact	Risk response	Residual risk	Background to assessment
Reputational risk to the MFA due to actions or advocacy by local partners of ICNL that is not aligned with MFA policy.	Unlikely	Minor	ICNL conducts country-level risk assessments and assess and mitigate safety risks to partners on an ongoing basis, which they have an on-going dialogue about with the MFA.	Lack of intervention or premature withdrawal from intervention by ICNL.	ICNL's work with its local partners is demand driven. They respond to situations that demands ICNL's expertise. ICNL thus does not choose its local partners proactively, but chooses between the partners that contact ICNL requesting assistance.

ICNL output-based engagement budget

Identifying information - grant and partner	
Engagement	Danish Support to ICNL 2024-2027
Partner	International Center for Not-for-Profit Law
File no.	
Engagement period	01/01/2024 - 12/31/2027 (48 months)
Budget currency	DKK
Original outcome (total budget/grant)	15,000,000 DKK
Date	24-04-2024
Prepared by/Reviewed by	Naila Aghabayli/ David Moore, Aygul Minigalina
Exchange rate (DKK/USD)	6,77454

	Unit	Unit Cost	Quantity	Budget	Year 1	Year 2	Year 3	Year 4	DKK
Total Output 1.1 - 3.2				15.000.000	3.750.000	3.750.000	3.750.000	3.750.000	15.000.000

Output 1.1 ICNL provides expertise to multilateral processes to safeguard civic space.									
1. Meetings and translations	workshop	-	0	-	-	-	-	-	-
2. Local Consultants and Subgrants			0	-	-	-	-	-	-
3. Salary and Personnel Costs									
Vice President - Legal Affairs	day	7.504	12	90.048	21.679	22.234	22.790	23.345	
Vice President - Programs	day	8.124	4	32.106	7.588	7.974	8.367	8.177	
Senior Legal Advisor & Coordinator for Multilateral Engagement	day	5.611	120	673.769	162.257	166.315	170.468	174.729	
Senior Legal Advisor - Global Programs	day	5.381	60	322.720	77.711	79.676	81.647	83.686	
Program Assistant	day	2.163	16	34.201	8.082	8.498	8.909	8.712	
Accountant	day	3.721	8	31.591	10.758	7.670	6.497	6.666	
Project Finance and Administration	day	3.217	28	89.297	18.074	16.979	26.407	27.837	
4. Monitoring, Evaluation, and learning (MEL)	month	1.167	48	56.016	15.954	19.311	10.257	10.494	
5. Communications	month	1.690	48	81.120	19.673	20.183	20.683	20.581	
6. Travel cost	lumpsum	213.168	1	213.168	41.582	56.506	57.007	58.073	
7. Operating Costs	month	1.770	48	84.960	19.687	20.676	21.699	22.898	
8. Project Audit	year	6.775	4	27.100	6.775	6.775	6.775	6.775	
Total direct cost output 1.1				1.736.096	409.820	432.797	441.506	451.973	1.736.096
Share indirect cost output 1.1		7%		121.527	28.687	30.296	30.905	31.638	121.527
Total budget output 1.1				1.857.623	438.507	463.093	472.411	483.611	1.857.623

Output 1.2: CSO partners engage in multilateral processes to protect or enhance civic space.									
1. Meetings and translations	workshop	27.776	1	27.776	13.549	14.227	-	-	
2. Local Consultants and Subgrants			0	-	-	-	-	-	
3. Salary and Personnel Costs									
Vice President - Legal Affairs	day	7.504	12	90.048	21.686	22.234	22.790	23.338	
Vice President - Programs	day	8.124	8	63.224	22.766	23.914	8.367	8.177	
Senior Legal Advisor & Coordinator for Multilateral Engagement	day	5.611	74	418.002	162.250	83.157	85.237	87.358	
Senior Legal Advisor - Global Programs	day	5.381	65	348.625	103.637	79.655	81.647	83.686	
Regional Director - Africa	day	6.051	10	59.714	-	59.714	-	-	
Senior Legal Advisor - LAC	day	5.777	10	55.606	55.606	-	-	-	
Program Assistant	day	2.163	16	34.202	8.086	8.495	8.909	8.712	
Accountant	day	3.721	8	29.779	7.173	7.350	7.533	7.723	
Project Finance and Administration	day	3.217	28	90.829	27.737	28.406	19.870	14.816	
4. Monitoring, Evaluation, and learning (MEL)	month	1.539	48	73.872	34.153	18.989	7.066	13.664	
5. Communications	month	2.022	48	97.056	23.518	24.104	24.714	24.720	
6. Travel cost	lumpsum	489.081	1	489.081	199.239	208.805	40.010	41.027	
7. Operating Costs	month	1.815	48	87.120	20.241	21.286	22.146	23.447	
8. Project Audit	year	6.775	4	27.100	6.775	6.775	6.775	6.775	
Total direct cost output 1.2				1.992.034	706.416	607.111	335.064	343.443	1.992.034
Share indirect cost output 1.2		7%		139.442	49.449	42.498	23.454	24.041	139.442
Total budget output 1.2				2.131.476	755.865	649.609	358.518	367.484	2.131.476

Output 1.3: ICNL and its partners produce knowledge products related to international norms and civil society participation in multilateral processes to safeguard civic space.									
1. Meetings and translations	workshop	-	0	-	-	-	-	-	
2. Local Consultants and Subgrants			0	-	-	-	-	-	

3. Salary and Personnel Costs									
Vice President - Legal Affairs	day	7.504	12	90.048	21.686	22.234	22.790	23.338	
Vice President - Programs	day	8.124	5	37.037	8.198	9.091	9.207	10.541	
Senior Legal Advisor & Coordinator for Multilateral Engagement	day	5.611	74	418.003	162.251	83.157	85.237	87.358	
Senior Legal Advisor - Global Programs	day	5.381	60	322.715	77.727	79.655	81.647	83.686	
Program Assistant	day	2.163	16	34.199	8.083	8.495	8.909	8.712	
Accountant	day	3.721	8	29.779	7.173	7.350	7.533	7.723	
Project Finance and Administration	day	3.217	15	47.139	18.022	9.471	9.945	9.701	
4. Monitoring, Evaluation, and learning (MEL)	month	523	48	25.104	9.725	5.000	5.115	5.264	
5. Communications	month	2.097	48	100.656	27.254	24.063	24.666	24.673	
6. Travel cost	lumpsum	-	0	-	-	-	-	-	
7. Operating Costs	month	1.781	48	85.488	19.876	20.913	21.855	22.844	
8. Project Audit	year	6.775	4	27.100	6.775	6.775	6.775	6.775	
Total direct cost output 1.3				1.217.268	366.770	276.204	283.679	290.615	1.217.268
Share indirect cost output 1.3		7%		85.209	25.674	19.334	19.858	20.343	85.209
Total budget output 1.3				1.302.477	392.444	295.538	303.537	310.958	1.302.477

Output 2.1: Civil society benefits from technical and financial assistance on civil society legal environment issues.									
1. Meetings and translations	workshop	-	0	-	-	-	-	-	
2. Local Consultants and Subgrants									
Consultants	total	54.196	4	216.784	54.196	54.196	54.196	54.196	
Subgrants	total	270.982	4	1.083.928	270.982	270.982	270.982	270.982	
3. Salary and Personnel Costs									
Vice President - Legal Affairs	day	7.504	16	120.064	28.912	29.639	30.384	31.129	
Vice President - Programs	day	8.124	8	61.094	15.177	15.940	16.408	13.569	
Senior Legal Advisor - Asia	day	5.381	54	291.247	62.186	63.721	81.647	83.693	
Regional Director - Africa	day	6.051	57	345.379	69.892	89.573	91.809	94.105	
Senior Legal Advisor - LAC	day	5.777	36	209.480	44.479	46.704	58.417	59.880	
Regional Director - MENA	day	5.381	36	194.367	41.459	42.686	54.427	55.795	
Grants Financial Officer	day	2.605	39	102.733	24.298	25.506	26.773	26.156	
Program Assistant	day	2.163	16	34.199	8.083	8.495	8.909	8.712	
Accountant	day	3.721	16	59.577	14.350	14.708	15.080	15.439	
Project Finance and Administration	day	3.217	83	265.837	63.062	65.266	69.554	67.955	
4. Monitoring, Evaluation, and learning (MEL)	month	2.970	48	142.560	31.932	32.741	35.871	42.016	
5. Communications	month	2.923	48	140.304	34.858	31.854	36.650	36.942	
6. Travel cost	lumpsum	342.988	1	342.988	83.720	84.932	86.172	88.164	
7. Operating Costs	month	1.788	48	85.824	19.949	20.899	21.814	23.162	
8. Project Audit	year	6.775	4	27.100	6.775	6.775	6.775	6.775	
Total direct cost output 2.1				3.723.465	874.310	904.617	965.868	978.670	3.723.465
Share indirect cost output 2.1		7%		260.643	61.202	63.323	67.611	68.507	260.643
Total budget output 2.1				3.984.108	935.512	967.940	1.033.479	1.047.177	3.984.108

Output 2.2: Informational resources on civic space issues and legal reform and resilience strategies produced.									
1. Meetings and translations	workshop	-		-	-	-	-	-	
2. Local Consultants and Subgrants									
Consultants	total	178.848	4	715.392	178.848	178.848	178.848	178.848	
3. Salary and Personnel Costs									
Vice President - Legal Affairs	day	7.504	38	285.385	72.285	59.284	75.963	77.853	
Vice President - Programs	day	8.124	1	12.073	4.933	1.592	2.764	2.784	
Program Assistant	day	2.163	8	17.103	4.048	4.241	4.458	4.356	
Accountant	day	3.721	8	29.779	7.173	7.350	7.533	7.723	
Project Finance and Administration	day	3.217	12	38.121	8.997	9.471	9.945	9.708	
4. Monitoring, Evaluation, and learning (MEL)	month	422	48	20.256	4.885	5.006	5.122	5.243	
5. Communications	month	2.009	48	96.432	23.382	23.948	24.551	24.551	
6. Travel cost	lumpsum	-	0	-	-	-	-	-	
7. Operating Costs	month	1.686	48	80.928	18.893	19.755	20.608	21.672	
8. Project Audit	year	6.775	4	27.100	6.775	6.775	6.775	6.775	
Total direct cost output 2.2				1.322.569	330.219	316.270	336.567	339.513	1.322.569
Share indirect cost output 2.2		7%		92.580	23.115	22.139	23.560	23.766	92.580
Total budget output 2.2				1.415.149	353.334	338.409	360.127	363.279	1.415.149

Output 3.1: Civil society benefits from technical and financial assistance on digital issues affecting civic space.								
1. Meetings and translations	workshop	11.212	1	11.212	-	3.557	3.733	3.922
2. Local Consultants and Subgrants								
Subgrants	total	155.567	4	622.268	169.362	169.364	169.364	114.178
3. Salary and Personnel Costs								
Vice President - Legal Affairs	day	7.504	12	90.798	14.455	14.823	30.384	31.136
Vice President - Programs	day	8.124	4	36.136	8.578	9.003	9.965	8.590
Senior Legal Advisor and Coordinator - Digital Programs	day	5.696	61	349.763	49.379	78.700	109.477	112.207
Legal Advisor – Digital Rights	day	4.945	45	220.166	47.612	50.951	60.050	61.553
Legal Advisor - Asia	day	4.825	38	184.715	27.891	38.127	58.620	60.077
Senior Legal Advisor - Africa	day	5.381	40	216.209	41.460	42.476	65.320	66.953
Grants Financial Officer	day	2.605	30	78.450	-	25.514	26.773	26.163
Program Assistant	day	2.163	12	25.642	6.063	6.368	6.680	6.531
Accountant	day	3.721	16	59.581	14.348	14.707	15.080	15.446
Project Finance and Administration	day	3.217	42	134.001	27.030	28.393	39.767	38.811
4. Monitoring, Evaluation, and learning (MEL)	month	2.070	48	99.360	14.633	27.712	30.743	26.272
5. Communications	month	2.342	48	112.416	27.220	27.883	28.609	28.704
6. Travel cost	lumpsum	182.777	1	182.777	24.429	51.811	52.618	53.919
7. Operating Costs	month	1.742	48	83.616	19.367	20.513	21.333	22.403
8. Project Audit	year	6.775	4	27.100	6.775	6.775	6.775	6.775
Total direct cost output 3.1				2.534.210	498.602	616.677	735.291	683.640
Share indirect cost output 3.1	7%			177.395	34.902	43.167	51.470	47.855
Total budget output 3.1				2.711.605	533.504	659.844	786.761	731.495
Output 3.2: Civil society contributes to multilateral processes on digital issues affecting civic space, including DDI.								
1. Meetings and translations	workshop	-	-	-	-	-	-	-
2. Local Consultants and Subgrants								
3. Salary and Personnel Costs								
Vice President - Legal Affairs	day	7.504	8	60.040	14.460	14.823	15.189	15.568
Vice President - Programs	day	8.124	6	45.957	7.585	7.974	8.367	22.031
Senior Legal Advisor and Coordinator - Digital Programs	day	5.696	70	399.973	82.287	84.323	115.235	118.128
Legal Advisor – Digital Rights	day	4.945	36	178.480	38.091	39.055	50.044	51.290
Senior Legal Advisor - Global Programs	day	5.381	44	237.458	41.464	63.721	65.320	66.953
Program Assistant	day	2.163	12	25.638	6.066	6.368	6.680	6.524
Accountant	day	3.721	13	48.492	10.758	11.022	13.190	13.522
Project Finance and Administration	day	3.217	13	42.577	8.759	16.435	528	16.855
4. Monitoring, Evaluation, and learning (MEL)	month	1.092	48	52.416	17.954	13.685	13.427	7.350
5. Communications	month	2.460	48	118.080	22.891	23.460	47.056	24.673
6. Travel cost	lumpsum	173.367	1	173.367	42.123	42.856	43.608	44.780
7. Operating Costs	month	1.739	48	83.472	19.323	20.500	21.279	22.370
8. Project Audit	year	6.775	4	27.100	6.775	6.775	6.775	6.775
Total direct cost output 3.2				1.493.050	318.536	350.997	406.698	416.819
Share indirect cost output 3.2	7%			104.514	22.298	24.570	28.469	29.177
Total budget output 3.2				1.597.564	340.834	375.567	435.167	445.996
Contingency								
Contingency (max 10% of total direct cost excluding contingency)								-
Total direct cost				14.018.692	3.504.673	3.504.673	3.504.673	3.504.673
Indirect cost								
Administrative costs (max. 7% of direct cost)				981.308	245.327	245.327	245.327	245.327
Total indirect cost				981.308	245.327	245.327	245.327	245.327
Total budget				15.000.000	3.750.000	3.750.000	3.750.000	3.750.000

ANNEX 6 – LIST OF SUPPLEMENTARY MATERIALS

#	Document / Material	Source
1	Anti-Discrimination and Harassment Policy	https://www.icnl.org/wp-content/uploads/ICNL-Anti-Discrimination-and-Harassment-Policy-vf.pdf
2	Safeguarding Policy	https://www.icnl.org/wp-content/uploads/ICNL-Safeguarding-Policy-vf.pdf
3	Whistleblower Policy (External)	https://www.icnl.org/wp-content/uploads/ICNL-Whistleblower-Policy-vf.pdf
4	Whistleblower Policy (Internal)	ICNL can make available upon request
5	Personnel Manual	ICNL can make available upon request
6	Equal Opportunity Employment Policy	ICNL can make available upon request
7	Conflict of Interest and Disclosure Policy	ICNL can make available upon request
8	Diversity, Equity, and Inclusion Statement	ICNL can make available upon request
9	Environmental Policy	ICNL can make available upon request
10	Financial Management Policies	ICNL can make available upon request
11	Procurement Policy	ICNL can make available upon request
12	Subgrant Award Policy and Guidelines	ICNL can make available upon request
13	Travel Policy	ICNL can make available upon request

ANNEX 7: PLAN FOR COMMUNICATION OF RESULTS

ICNL views communication through this project as a strategic tool to strengthen networking and knowledge sharing and to increase impact. Thus, the communication plan for the project has three main aims:

- Sharing knowledge: Communicating knowledge, experiences, learning, and research results, with a view towards empowering various stakeholders to push for the expansion or protection of civic space.
- Increasing public awareness: Raising awareness among key constituencies of the importance of civic space.
- Public relations: Sharing the project’s progress and results with various stakeholders.

ICNL has a robust online presence. We regularly use our website and social media accounts to share civic space trends, threats, and successes, thereby raising public awareness of the importance of civic space. We will make these platforms available to communicate the project’s key successes to interested stakeholders.

ICNL will communicate the results of the project in a variety of ways, depending on both the audience and the message, as indicated in the table below:

What? (the message)	When? (the timing)	How? (the mechanism)	Audience(s)	Responsible
Developments relating to international norms and multilateral engagement	As developments occur and needs arise among local partners	<ul style="list-style-type: none"> • Publications and briefers • Social media • Website • Direct communication 	Civil society partners, donors, international organizations, and other stakeholders	ICNL’s global team
Opportunities to participate in multilateral processes	As opportunities arise	<ul style="list-style-type: none"> • Direct communication • Social media 	Civil society partners and other stakeholders	ICNL’s global and regional teams
National-level legal developments and digital issues affecting civic space	Routinely, as country reports are updated	<ul style="list-style-type: none"> • Updates to Civic Freedom Monitor (CFM) country reports • Social media infographics 	Civil society partners, donors, international organizations, and other stakeholders	ICNL program staff
	As needs arise in relation to proposed or existing laws, policies, and regulations	<ul style="list-style-type: none"> • Legal analyses of proposed or existing laws, policies, and regulations • Publications, briefers, toolkits, and other knowledge products 	Civil society partners, governments, parliamentarians, donors, and international organizations	ICNL program staff
Project developments and civic space trends	Quarterly basis, on January 31, April 30, July 31, October 31	<ul style="list-style-type: none"> • ICNL quarterly updates 	The Ministry of Foreign Affairs of Denmark.	Project Coordination Committee
	Annually, by June 30 of each year.	<ul style="list-style-type: none"> • ICNL annual progress narrative reports 	The Ministry of Foreign Affairs of Denmark.	Project Coordination Committee

ANNEX 8: QUALITY ASSURANCE CHECKLIST

File number/F2 reference: 24/02538

Programme/Project name: Support to ICNL - 'Protecting and expanding civic space'

Programme/Project period: 1 January 2024 - 31 December 2027

Budget: DKK 15 mio.

This Quality Assurance Checklist should be used by the responsible MFA unit to document the quality assurance process of appropriations, where development specialists from either ELK or other units are not involved in the process; i.e.

- (i) *internal appraisals* of appropriations up to DKK 10 Million where this checklist constitutes the appraisal.
- (ii) *external appraisals* of appropriations between DKK 10 – 43 million and (iii) appraisal in exceptional cases. The checklist aims to help the responsible MFA unit ensure that key questions regarding the quality of the programme/project are asked and that the answers to these questions are properly documented and communicated to the approving authority.

Presentation of quality assurance process:

A development specialist from HUMCIV independent from the project design has carried out an appraisal of the project to ensure compliance with Danida policies and the Aid Management Guidelines of the Danish MFA including meetings with ICNL and desk officer. The recommendations of the appraisal report have been addressed in the final project document and annexes.

❑ The design of the programme/project has been appraised/appraisal checklist filled out, by someone independent who has not been involved in the development of the programme/project.

Comments: Internal appraisal carried out by development specialist in HUMCIV.

❑ The recommendations of the appraisal/comments in the appraisal checklist have been reflected upon in the final design of the programme/project.

Comments: Revisions were made based on recommendations from the appraisal to the project design, including elaboration of ToC, elaboration of selection of partners, the results framework, budget and alignment between the two.

❑ The programme/project complies with Danida policies and Aid Management Guidelines, including the fundamental principles of Doing Development Differently.

Comments: Yes.

❑ The programme/project addresses relevant challenges and provides adequate responses.

Comments: The project is relevant to address the challenge of civic space which is a priority in the Danish strategy for development cooperation.

- ❑ Issues related to HRBA, LNOB, Gender, Youth, Climate Change, Green Growth and Environment have been addressed sufficiently in relation to content of the project/programme.

Comments: Yes, HRBA, LNOB, Gender, Youth are cross-cutting priorities in the project. Civil society working for climate change are part of target group.

- ❑ Comments from the Danida Programme Committee (if applicable) have been addressed

Comments: N/A

- ❑ The programme/project outcome(s) are found to be sustainable and in line with the partner's development policies and strategies. Implementation modalities are well described and justified.

Comments: Implementation modalities are well described and justified in the project document and annexes.

- ❑ The theory of change (if applicable), results framework, indicators and monitoring framework of the programme/project provide an adequate basis for monitoring results and outcome.

Comments: Yes.

- ❑ The programme/project is found sound budget-wise,

- ❑ The agreed budget and financial reporting procedures provide an adequate basis for financial monitoring of funds.

Comments: Yes, follow the MFA's financial management guidelines.

- ❑ The programme/project is found realistic in its time-schedule.

Comments: Yes, timeline based on past experiences.

- ❑ Other donors involved in the same programme/project have been consulted, and possible harmonised common procedures for funding and monitoring have been explored.

Comments: Yes, there has been close coordination with other donors, including Sweden and the Netherlands.

- ❑ Key programme/project stakeholders have been identified, the choice of partner has been justified and criteria for selection have been documented.

Comments: Yes.

- ❑ The implementing partner(s) is/are found to have the capacity to properly manage, implement and report on the funds for the programme/project and lines of management responsibility are clear.

Comments: Yes, the Danish MFA also drew on a financial and administrative monitoring review from 2023 carried out by SIDA that concluded that ICNL was fit to manage the grant from SIDA.

□ Implementing partner(s) has/have been informed about Denmark's zero-tolerance policies towards (i) Anti-corruption; (ii) Child labour; (iii) Sexual exploitation, abuse and harassment (SEAH); and, (iv) Anti-terrorism.

Comments: Yes

□ Risks involved have been considered and risk management integrated in the programme/project document.

Comments: Yes.

In conclusion, the programme/project can be recommended for approval: **yes** / no

Date and signature of Desk Officer: 08.03.24 Christian Lyngsø Alvarez

Date and signature of Management: 08.03.24



Birgitte Nygaard Markussen