

Guidelines for EU support to civil society in enlargement countries, 2014 2020

June 2015 (final)

Background for the table:

- A set of objectives, results and indicators was developed for EU support to civil society, which allows the measurement of progress at country level as well as across the enlargement region
- The Guidelines are developed for the period of 2014 – 2020, however, one needs to have in mind that most of the objectives in the guidelines cannot be achieved in the period of 6 years, since the realization of objectives includes legislative changes and their proper implementation
- For the purpose of the Monitoring and Evaluation and Proposed Results Framework we used following definitions of benchmark and target:
 - **Benchmark:** That which is attainable under ideal conditions; it is a standard or reference point. Building on a definition that a benchmark is “a quantitative target which represents what can be achieved by the best”, the benchmark in this framework is an **optimum situation**, measured through EU member states average or assessments. Since some of the indicators are qualitative, also corresponding benchmarks are qualitative as well. All benchmarks, except of some under CSO capacity (see: notes for participants of the mid-scale workshops), are based on analysis of secondary sources (such as Global Civil Society Index, Comparative Nonprofit Sector Publication, JHU, 2004; Volunteering in the European Union, EAC-EA, DG EAC, February 2010; www.usig.org, etc.).
It is very important that the benchmark is measurable, even though it is qualitative. For example, if the indicator is “quality of *something*”, it is not advisable that the benchmark would be “better quality”, since one would then never know when the benchmark is reached. Therefore, when defining the benchmark one needs to define what exactly and concretely would better quality mean in each specific case, e.g. indicator 1.2.c Quality of (labour) legislative framework → Benchmark: Labour legislative framework is not discriminative towards CSOs (since that is one of the definitions of quality legislation from the point of view of CSO development).
 - **Target:** a specified level of performance for an indicator at a predetermined point in time. Since benchmarks for indicators cannot be achieved until 2020, **national targets represent a step towards achieving the benchmark and are set to 2020**. In other words, targets represent a mid-term goal towards achieving benchmarks. When setting the national target, stakeholders need to have in mind *national specifics*, e.g. baseline for each indicator in 2014. Participants at the mid-scale workshops should agree on quantitative target, where appropriate (when national quantitative target is need, the target is marked in yellow)
 - **Baseline:** the level of performance at some specified starting point. Provides the initial point of comparison for the future measures of performance. When setting the national target one needs to have in mind a baseline – the current state of affairs (in 2014) and what can be realistically achieved till 2020. In the cases of higher baseline, national target (2020) can be the same as the benchmark.
For determining a baseline we recommend to use EC annual progress report, BCSDN’s country reports on the Monitoring matrix for enabling environment for civil society development, IPSOS surveys, as well as any other relevant source.

Objectives	Results	Indicator	MoV	Benchmark	National target (2020)
Conducive environment					
1. An enabling legal and policy environment, for the exercise of the rights of freedom, expression, assembly and association,	1.1. All individuals and legal entities can express themselves freely, assemble peacefully and establish, join and participate in non-formal and/or registered organisations	1.1.a. Quality of existing legislation and policy framework	1.1.a. and 1.1.b. BCSDN	1.1.a. Legislation provides for freedom of speech without state interference, freedom of assembly without discrimination and hindering conditions, and for accessible, timely and inexpensive registration of CSOs Continuous comparative monitoring and analysing of legislation and policy framework is in place, gaps in national legislation, policy	1.1.a. - Freedom of speech is explicitly guaranteed in legislation - legislation requires only prior notification (and not authorization) for exercising freedom of assembly - maximum ___ days needed for registration of CSOs, the registration costs are maximum ___ EUR Gaps in national legislation, policy framework and implementation are identified.

		1.1.b. Progress with the adoption and implementation of relevant legislation		<p>framework and implementation are identified¹.</p> <p>1.1.b. Gaps in legislation and policy framework are decreased for 90 %.</p> <p>Legislation and policy framework are fully implemented.</p>	<p>1.1.b. Gaps in legislation and policy framework are decreased for ___ %.</p> <p>Implementation gaps are decreased for ___ %.</p>
	1.2. The policies and legal environment stimulate and facilitate volunteering and employment in CSOs	<p>1.2.a. Number of employees in CSO (permanent and part-time)</p> <p>1.2.b. Number of volunteers in CSOs</p>	1.2.a., 1.2.b. and 1.2.c. BCSDN	<p>1.2.a. Accurate data on the number of employees in CSO is available on the annual level.</p> <p>6 % of all employed is employed in CSO sector</p> <p>1.2.b. Accurate data on the number of volunteers and number of voluntary hours</p>	<p>1.2.a. Accurate data on the number of employees in CSO is available on the annual level.</p> <p>___ % of all employed is employed in CSO sector</p> <p>1.2.b. Accurate data on the number of</p>

¹ For instructions how to measure the indicators 1.1.a and 1.1.b see Appendix 1.

				<p>implemented in CSOs is available on the annual level.</p> <p>Number of volunteers in CSOs is increased for 50 %.</p> <p>Number of implemented voluntary hours is increased for 50 %.</p>	<p>volunteers and number of voluntary hours implemented in CSOs is available on the annual level.</p> <p>Number of volunteers in CSOs is increased for __ %.</p> <p>Number of implemented voluntary hours is increased for __ %</p>
		1.2.c. Quality of legislative framework	1.2.c. - Labour legislative framework (including active employment policy) is not discriminative towards CSOs ² ;	1.2.c There are no discriminative articles for CSOs in labour legislation (including active employment policy)	

² While labour law as such probably is not discriminative (= does not put CSOs as employers in a different position as other employers. e.g. with different conditions or demands), this may happen with other labour connected legislation and its implementation, especially active employment policy. Labour legislation would be discriminative, if, for example, subsidy for employment of people registered as unemployed would be available only for public institutions and/or business sector and not for CSOs.

				- Legislative framework is stimulative towards promotion of volunteering	- legislation enables tax-free reimbursement of travel expenses and per diems to volunteers
	<p>1.3. National and/or local authorities have enabling policies and rules for grass-roots organisations* and/or civic initiatives.</p> <p>*A grass-roots organisation is a self-organised group of individuals pursuing common interests through a volunteer-based, non-profit organisation. Grassroots organisations usually have a low degree of formality but a broader purpose than issue-based self-help groups, community-based organisations or neighbourhood-associations.</p>	1.3.a. Quality of the enabling environment for grass-roots organisations and/or civic initiatives	1.3.a. BCSDN	1.3.a. Registration of grass-roots is not mandatory; unregistered organizations can freely operate and receive financial support	1.3.a. Legislation recognizes and enables existence and functioning of grass-roots
2. An enabling financial environment, which supports sustainability of CSOs.	2.1. Easy-to-meet financial rules for CSO, which are proportionate to their turn-over and non-commercial activities	2.1.a. CSOs' perception of the ease and effectiveness of financial rules and reporting requirements (disaggregated by type / size of CSO)	2.1.a. 2.1.b. BCSDN	2.1.a. 80 % of CSOs perceive financial, including tax, rules as reasonable, clear, proportionate to CSO turn-over; in their opinion, an efficient support system is in place (clear instructions, knowledgeable financial public officers)	2.1.a. __ % of CSOs perceive financial, including tax, rules as reasonable, clear, proportionate to CSO turn-over; in their opinion, an efficient support system is in place

		2.1.b. Quality of financial rules (with the focus on built-in mechanisms that financial rules and obligations change as the turn-over and non-commercial activities change).		2.1.b. Financial, including tax, rules are clear, understandable and proportionate to CSOs' turn-over (at least 3 different formats ³ according to CSOs' turn-over)	(clear instructions, knowledgeable financial public officers) 2.1.b. Financial, including tax, rules are stable, clear, with at least __ different formats according to CSOs' turn-over
	2.2. Donations are stimulated with adequate legislation and regulations	2.2.a. Quality and applicability/practice of the legal framework for individual and corporate giving	2.2.a. BCSDN	2.2.a Legislation provides for stimulating tax incentives for corporate and individual giving: - tax relief ⁴ in the amount of 5 % of taxable income for corporations, - tax relief in the amount of 10 % of taxable income for individual persons OR ⁵ 2 % tax allocation for public benefit purposes (for the countries with % law system)	2.2.a. - tax relief in the amount of __ % of taxable income for corporations, - tax relief in the amount of __ % of taxable income for individual persons OR __

³ With »format« different forms or reporting is meant (e.g. grass roots only need to run a general ledger and annual reporting is simplified, organisations up to certain amount of annual turn-over can use single entry accounting, etc.).

⁴ If there is some other system of tax incentives for donations in place in respective countries, participants at the mid-scale workshop should change the benchmark and target accordingly.

⁵ Each country needs to choose the benchmark and target, which are appropriate for the tax system in the specific country.

				<p>Data on the number of registered individual and corporate taxpayers who donated to CSOs is available on the annual level.</p> <p>60 % of corporations and 60 % of individual taxpayers donate to CSOs.</p>	<p>% tax allocation for public benefit purposes (for the countries with % law system)</p> <p>Data on the number of registered individual and corporate taxpayers who donated to CSOs is available on the annual level.</p> <p>__ % of corporations and __ % individual taxpayers donate to CSOs.</p>
	2.3. Financial (e.g. tax or in-kind) benefits are available	2.3.a. Quality of the system of tax benefits for the CSOs' operational and economic activities	2.3.a. BCSDN	2.3.a. Income from CSOs mission-related economic activity ⁶ , is tax free.	2.3.a. Income from CSOs mission-related economic activity, is tax free up to amount of annual income of _____ EUR

⁶ Mission-related economic activity is economic activity, implemented by CSO, which is directly connected to CSO's mission and the income from it is solely used for the realization of such mission.

	2.4. Government support to CSOs is available and provided in a transparent, accountable, fair and non-discriminatory manner	2.4.a. Increase of public funding for CSOs 2.4.b. Quality of state funding frameworks for civil society organisations (focusing on procedural document)	2.4.a. and 2.4.b. BCSDN	2.4.a. Data on the amount of public funding of CSOs is available on the annual level. Public funding for CSOs is increased for 40 %. 2.4.b. Legal framework for public funding includes: public funding on the basis of policy papers, inclusion of beneficiaries in programming of the tenders, clear criteria published in advance, deadlines for decision, merit decision with arguments, evaluation of achieved outputs and outcomes on the project and program level, possibility of prepayments and multi-annual contracts.	2.4.a. Data on the amount of public funding of CSOs is available on the annual level. Public funding for CSOs is increased for __%. ⁷ 2.4.b. Legal framework for public funding includes: inclusion of beneficiaries in programming of the tenders, clear criteria published in advance, deadlines for decision, merit decision with arguments <i>[participants can choose other elements from benchmark as well]</i>	
Changing relations CSOs and government						
3	Civil society and	3.1. Public institutions recognise the	3.1.a. Percentage of	3.1.a. and	3.1.a. Data on the draft	3.1.a. Data on the

⁷ When setting this target, countries need to have in mind the baseline (how much public funds already go to CSOs in the specific country). If the amount is comparatively higher (e.g. Serbia) the expected increase is probably lower than in the country with almost no public funds available.

<p>public institutions work in partnership through dialogue and cooperation, based on willingness, trust and mutual acknowledgment around common interests</p>	<p>importance of CSOs in improving good governance through CSOs' inclusion in decision making processes</p>	<p>laws/bylaws, strategies and policy reforms effectively* consulted with CSOs</p> <p>* in terms of:</p> <ul style="list-style-type: none"> - adequate access to information - sufficient time to comment - selection and representativeness / diversity of working groups - acknowledgement of input - degree to which input is taken into account - feedback / publication of consultation results <p>3.1.b Quality* of structures and</p>	<p>3.1.b BCSDN</p>	<p>laws/bylaws consulted in accordance to national legislation is available on the annual level.</p> <p>80 % of laws/ bylaws, strategies and policy reforms effectively consulted with CSOs</p> <p>3.1.b. Mechanisms for dialogue are clear, open, accessible and</p>	<p>draft laws/bylaws consulted in accordance to national legislation is available on the annual level.</p> <p>___ % of laws/ bylaws, strategies and policy reforms effectively⁸ consulted with CSOs</p> <p>3.1.b. There is a designated body⁹, institution</p>
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⁸ For the purpose of Guidelines and monitoring effective consultations are those when minimum standards of consultations, as follows, are respected:

1. there is a legal obligation to publish draft laws on the Internet and drafts are regularly published,
2. sufficient time to comment: minimum 15 **working** days,
3. if there is a working group or other advisory body established for the preparation of specific draft, the working group members represent various stakeholders and criteria for appointment of the representatives are transparent, open, inclusive and known in advance,
4. there is an obligation to publish a feedback report with a summary of consultation process, list of involved stakeholders, summary of received comments/proposals, their impact on the draft law and justification of rejected comments/proposals.

⁹ For the purpose of Guidelines and monitoring the existence of a designated body for cooperation can be acknowledged if:

1. there is an equal representativeness of Governmental/public and CSO sector,

		<p>mechanisms in place for dialogue and cooperation between CSOs and public institutions</p> <p>* in terms of:</p> <ul style="list-style-type: none"> - CSO representation in general - representation of smaller/weaker CSOs - its visibility and availability - government perception of quality of structures and mechanisms - CSOs perception of structures and 		<p>efficient (issues are resolved in timely manner) on state (government, ministries, parliament) and local level (mayor, local administration, municipality council)</p>	<p>or contact point for dialogue between:</p> <ul style="list-style-type: none"> - the Government and CSOs, and -Parliament and CSOs. <p>At least ___ % of ministries has such a contact point and at least ___ % of local governments has such a body, institution or contact points with continuous and constructive cooperation.</p>
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2. criteria for appointment of CSO representatives are transparent, open, inclusive and known in advance,
 3. among CSO representatives, different types of CSOs are represented (according to the type, scope, missions of the CSO sector in the respective country)
 4. The work of the body is open and transparent: there is a designated web-page, on which all documents and minutes of meetings are published, CSOs and other interested can send different proposals for discussion at the body's session and they receive feedback after the respective session,
 5. The body meets regularly (at least 3 times per year) and discusses current issues.

In the case of parliament and ministerial contact point established, above criteria do not apply. The contact point may be acknowledged if:

1. the contact point is published on the ministerial/parliament web-page,
2. CSOs can access the contact point through various communication mechanisms (email, phone, etc.),
3. the contact point is actively engaged in solving proposals and issues raised by CSOs (there is a reaction and further action upon CSOs' proposals/issues raised),
4. the contact point provides feedback on the proposals and issues raised by CSOs,
5. the existence of a contact point is not used as an excuse by other civil servants/units/committees not to cooperate with CSOs in specific issues within their scope of work.

		mechanisms		Data on all such bodies, institutions or contact points is available in the transparent and accessible manner.	Data on all such bodies, institutions or contact points is available in the transparent and accessible manner.
CSOs Capacities					
4. Capable, transparent and accountable CSOs	4.1. CSOs' internal governance structures are transparent and accountable to members/constituents/beneficiaries	4.1.a. Percentage of CSOs publishing their governance structure and internal documents (statutes, codes of conduct etc.)	4.1.a. independent survey run by TACSO	4.1.a. 80 % of CSOs, that have an online presence ¹⁰ , regularly publish and updates their governance structure and internal documents (statutes, codes of conduct etc.)	4.1.a. __ % of CSOs, that have an online presence, regularly publish and updates their governance structure and internal documents (statutes, codes of conduct etc.)
	4.2. CSOs are able to communicate the results of their activities to the public	4.2.a. External perception of importance and impact of CSOs activities.	4.2.a. independent survey run by TACSO	4.2.a. 80 % of surveyed trust to NGOs in their country 80 % of the general population believes that NGOs support dealing with problems in their country	4.2.a. __ % of surveyed trust to NGOs in their country __ % of the general population believes that

¹⁰ Online presence constitutes different kinds of channels, which enables CSOs to publish data (such as a web site, profiles and accounts on different social networks, hosting on the network's web site, etc.)

					NGOs support dealing with problems in their country
	4.3. CSOs are transparent about their programme activities and financial management	4.3.a. Percentage of CSOs making their (audited) financial accounts and annual reports publicly available	4.3.a independent survey run by TACSO	4.3.a. 80 % of CSOs make their (audited) financial accounts and annual reports publicly available	4.3.a. ___ % of CSOs make their (audited) financial accounts and annual reports publicly available
	4.4. CSOs monitor and evaluate the results and impact of their work	4.4.a. Share of CSOs that monitor and evaluate their projects and programmes using baselines and quality indicators	4.4.a. independent survey run by TACSO	4.4.a. 80 % CSOs with at least 2 employees monitor and evaluate their projects and programmes using baselines and quality indicators	4.4.a. ___ % of CSOs with at least 2 employees monitor and evaluate their projects and programmes using baselines and quality indicators
5. Effective CSOs	5.1. CSO activities are guided by strategic long-term organisational planning	5.1.a. Share of CSOs which have developed strategic plans including human resources development activities	5.1.a. independent survey run by TACSO	5.1.a. 50 % of CSOs develop strategic plans, including human resources development activities 80 % of CSOs with at least 2 employees develop strategic plans, including human resources development	5.1.a. ___ % of CSOs develop strategic plans, including human resources development activities ___ % of professional CSOs with at least 2 employees

				activities, in order to attract and retain talent	develop strategic plans, including human resources development activities
				80 % of CSOs that implement activities according to their strategic plan	__ % of CSOs that implement activities according to their strategic plan
	5.2. CSOs use research and other forms of evidence to underpin their activities	5.2.a. Number of CSOs' who use adequate argumentation and analysis for achieving advocacy goals	5.2.a. independent survey run by TACSO	5.2.a. 80 % of CSOs involved in advocacy state that they use adequate argumentation and analysis for achieving advocacy goals	5.2.a. __ % of CSOs involved in advocacy state that they use adequate argumentation and analysis for achieving advocacy goals
	5.3. CSOs regularly network within and outside country borders and make use of coalition-building for increased impact in campaigning and advocacy	5.3.a. Share of CSOs taking part in local, national, regional and international networks	5.3.a. independent survey run by TACSO	5.3.a. 80 % of CSOs are taking part in at least 1 local, national, regional or international network	5.3.a. __ % of CSOs are taking part in at least 1 local, national, regional or international network
6. Financially sustainable CSOs	6.1. Fund-raising activities are rooted in CSOs' long-term strategic plans and the core mission of the organisation	6.1.a. Percentage of CSOs that confirm that they are able to raise funds according to their strategic plans	6.1.a. independent survey run by TACSO	6.1.a. 80 % of CSOs that have a strategic plan state that they mainly collect funds in line with their strategic plan	6.1.a. __ % of CSOs that have a strategic plan state that they mainly collect funds in line with their strategic plan

				80 % CSOs state that they are able to fundraise at least 70 % of their strategic plan	__ % of CSOs state that they are able to fundraise at least 70 % of their strategic plan
	6.2. CSO have a diversified funding base, including membership fees, corporate/individual giving and social entrepreneurship	6.2.a. Diversity in CSO sources of income	6.2.a. independent survey run by TACSO	<p>6.2.a. Sources of income of 80 % of CSOs are derived from 3 different sources*, out of which none of the sources constitutes more than 50 % of the CSO's income.</p> <p>*Sources of funding are grouped as follows:</p> <ol style="list-style-type: none"> 1. Public sources: Government/ministries/state administration bodies, and local and/or regional administration 2. EU funds 3. Other FOREIGN private or public sources (e.g. embassies) 4. members 5. citizens 6. private companies operating in the country 7. public companies 8. own economic activity 	<p>Sources of income of __ % of CSOs are derived from 3 different sources, out of which none of the sources constitutes more than 50 % of the CSO's income.</p>

APPENDIX 1: How to measure indicators 1.1.a and 1.1.b and which reference point to use

STEP 1 - reaching the target under **1.1.a**: from the bellow list of standards identify those that are not regulated by the country's legislation or policy framework (choose from the list *legislative standards*) and those, which identify gaps in implementation (choose from the list *practice standards*). **Each identified missing standard constitutes 1 gap**. For objectivity, it is very important to include all relevant stakeholders (public institutions, CSOs, media) in the identification of the gaps.

Standards are grouped into 2 groups – basic legislation, which is core for other standards, and more detailed standards. The treatment (level of importance and commitment) of the two groups depends on the specific country.

Legislative standards

Basic legislation

- There is a legal framework according to which any person can establish associations, foundations and other types of non-profit, non-governmental entities (e.g., non-profit company) for any purpose.
- The legal framework allows both individual and legal persons to exercise this right without discrimination (age, nationality, legal capacity, gender etc.).
- The legal framework provides guarantees against state interference in internal matters of associations, foundations and other types of non-profit entities.
- The legal framework is based on international standards and provides the right for freedom of assembly for all without any discrimination.
- The laws recognize and do not restrict spontaneous, simultaneous and counter-assemblies.
- The legal framework provides freedom of expression for all.
- Restrictions, such as limitation of hate speech, imposed by legislation are clearly prescribed and in line with international law and standards.

Detailed standards

- Registration is not mandatory, and in cases when organizations decide to register, the registration rules are clearly prescribed and allow for easy, timely and inexpensive registration and appeal process.
- The law allows for networking among organizations in the countries and abroad without prior notification.
- The state provides protection from interference by third parties.

- Financial reporting (including money laundering regulations) and accounting rules take into account the specific nature of the CSOs and are proportionate to the size of the organization and its type/scope of activities.
- Sanctions for breaching legal requirements should be based on applicable legislation and follow the principle of proportionality.
- The restrictions and the rules for dissolution and termination meet the standards of international law and are based on objective criteria which restrict arbitrary decision making.
- Legislation allows CSOs to engage in economic activities.
- CSOs are allowed to receive foreign funding.
- CSOs are allowed to receive funding from individuals, corporations and other sources.
- The exercise of the right is not subject to prior authorization by the authorities, but at the most to a prior notification procedure, which is not burdensome.
- Any restriction of the right based on law and prescribed by regulatory authority can be appealed by organizers.
- Libel is a misdemeanour rather than part of the penal code.
- The legal framework provides the possibility to communicate via and access any source of information, including the Internet and ICT; if there are legal restrictions, these are exceptional, limited and based on international human rights law.
- The legal framework prohibits unjustified monitoring of communication channels, including Internet and ICT, or collecting users' information by the authorities.

Practice standards

Basic standards

- Every individual or legal entity in practice can form associations, foundations or other non-profit, non-governmental organizations offline or online.
- There are no cases of state interference in internal matters of associations, foundations and other types of non-profit entities.
- There are no cases of encroachment of the freedom of assembly, and any group of people can assemble at desired place and time, in line with the legal provisions.
- Restrictions are justified with explanation of the reason for each restriction, which is promptly communicated in writing to the organizer to guarantee the possibility of appeal.
- Simultaneous, spontaneous and counter-assemblies can take place, and the state facilitates and protects groups to exercise their right against people who aim to prevent or disrupt the assembly.
- No excessive use of force is exercised by law enforcement bodies, including pre-emptive detentions of organizers and participants.

- CSO representatives, especially those from human rights and watch dog organizations enjoy the right to freedom of expression on matters they support and they are critical of.
- There are no cases of encroachment of the right to freedom of expression for all.
- There are no cases where individuals, including CSO representatives would be persecuted for critical speech, in public or private.

Detailed standards

- Individuals and legal entities are not sanctioned for not-registering their organizations.
- Registration is truly accessible within the legally prescribed deadlines; authorities decide on cases in non-subjective and apolitical manner.
- Individuals and CSOs can form and participate in networks and coalitions, within and outside their home countries.
- There are no practices of invasive oversight, which impose burdensome reporting requirements.
- Sanctions are applied in rare/extreme cases, they are proportional and are subject to a judicial review.
- Legislation on CSOs engaging in economic activities is implemented and is not burdensome for CSOs.
- There are no restrictions (e.g. administrative or financial burden, preapprovals, or channelling such funds via specific bodies) on CSOs to receive foreign funding.
- Receipt of funding from individuals, corporations and other sources is easy, effective and without any unnecessary cost or administrative burden.
- There are cases of freedom of assembly practiced by CSOs (individually or through their organizations) without prior authorization; when notification is required it is submitted in a short period of time and does not limit the possibility to organize the assembly.
- Media should have as much access to the assembly as possible.
- There is no sanction for critical speech, in public or private, under the penal code.
- There are no cases in practice where restrictions are imposed on accessing any source of information, including the Internet or ICT.
- The Internet is widely accessible and affordable.
- There is no practice or cases of unjustified monitoring by the authorities of communication channels, including the Internet or ICT, or of collecting users' information.
- There are no cases of police harassment of members of social network groups.

STEP 2 - reaching the target under **1.1.b**: both targets under 1.1.b are measuring decrease in gaps. Meaning, how many (in %) gaps have been closed (which standards are now part of legislation/policy framework or which practice standards are now respected). The set targets for specific country depend on the number of identified gaps (what is realistic to expect), their character (basic or detailed) and political environment. For objectivity, it is very important to include all relevant stakeholders (public institutions, CSOs, media) in the assessment, whether the gap has been “closed” or not.