



2021 CIVIL SOCIETY ORGANIZATION SUSTAINABILITY INDEX

BANGLADESH
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2021 CIVIL SOCIETY ORGANIZATION SUSTAINABILITY INDEX

For Bangladesh

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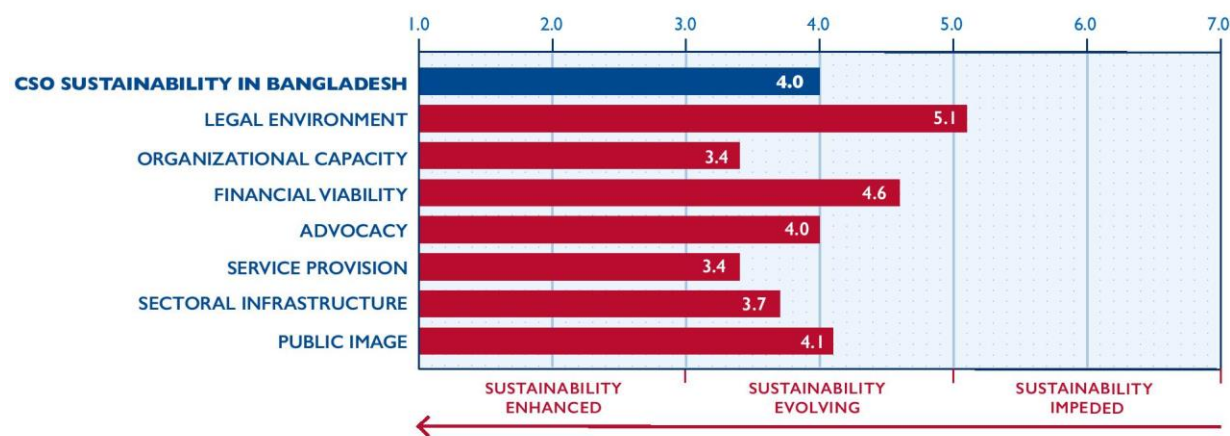
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BANGLADESH

Capital: Dhaka
Population: 165,650,475
GDP per capita (PPP): \$4,800
Human Development Index: Medium (0.661)
Freedom in the World: Partly Free (39/100)

OVERALL CSO SUSTAINABILITY: 4.0



Bangladesh was heavily impacted by the COVID-19 pandemic in 2021, both economically and socially. After several waves of COVID-19 outbreaks, the country at last began a gradual return to some level of stability in August 2021.

The virus was first detected in the country in March 2020, prompting the shutdown of schools and businesses and the imposition of restrictions on domestic travel and public gatherings. The national shutdown was lifted at the end of May 2020, but some restrictions continued until September 2020 and schools remained closed throughout the year. By mid-April 2021, COVID-19 cases and deaths again began to rise and the government re-imposed a strict lockdown, shuttering businesses and restricting travel and gatherings. Restrictions temporarily relaxed over the course of 2021 in response to changes in the rates of infection and were partially lifted in August. This change in policy permitted limited social, political, and religious events, but maintained a ban on all large public gatherings through the end of the year. By the end of 2021, Bangladesh had recorded nearly 1.6 million cases of COVID-19 and over 28,000 deaths. The government began to distribute vaccines in February 2021 and has since become the world's largest recipient of COVID-19 vaccines through the COVID-19 Vaccines Global Access (COVAX) initiative.

August marked a milestone for Bangladesh's gradual return to normal operations. Private sector employees largely returned to their offices, and, after some debate, schools reopened in September 2021 for the first time since March 2020. Though the government did not declare any new stimulus packages in 2021, some stimulus support from 2020 continued, including food support and low-interest loans to cottage, small, and medium enterprises (CSMEs). The economic toll of the pandemic and resulting lockdowns, however, remained heavy for all sectors in 2021, and low-income households struggled to meet even essential needs. Though real gross domestic product (GDP) growth accelerated to 6.9 percent in 2021, poverty remained a significant challenge. According to the World Bank, 11.9 percent of Bangladesh's population is below the international poverty line of \$1.90 a day, a slight improvement from 12.9 percent in 2020.

Bangladesh continues to host more than 1.1 million Rohingya refugees from Myanmar, many of whom have been in the country since 2017. The vast majority—nearly 900,000—have been living in thirty-four refugee camps within Cox's Bazar. In December 2020, the government began to relocate refugees from Cox's Bazar to the uninhabited island of Bhasan Char, despite initial concerns from the United Nations (UN), Human Rights Watch, and others about the quality of life on the island. By November 2021, nearly 20,000 refugees had been relocated to the island. Bangladesh also signed a memorandum of understanding with the UN High Commissioner for Refugees (UNHCR) on the issue, establishing a framework for UN support for refugee operations on Bhasan Char. Some CSOs have also begun development programs on the island.

The state of civic space in Bangladesh remained "repressed," according to the CIVICUS Monitor's December 2021 report. Human rights violations continued to be a concern, and CSOs, unions, and the media faced increasing obstacles to their ability to operate freely. In late March, demonstrations against the visit of Indian Prime Minister

Narendra Modi turned violent as supporters of the religious hardline group Hefazat-e-Islam accused Modi of stoking communal violence against Muslims in India. Police fired tear gas and rubber bullets after protesters barricaded parts of the highway; by March 29, after several days of demonstrations and clashes between protesters and the police, thirteen people had died. The government did not conduct an investigation following the clashes and CSOs remained silent. Demonstrations and clashes again gripped the country in October after a photo was posted on social media showing a copy of the Quran at the feet of a Hindu statue, sparking attacks on Hindus and their temples.

Arrests and government crackdowns for allegedly “spreading rumors” and “misinformation” on social media, particularly in response to criticism of the government’s handling of COVID-19, continued in 2021. Most of the arrests were based on the 2018 Digital Security Act (DSA), a law that contains overly broad and vague provisions granting the authorities extensive powers to police online space. The DSA also allows police to detain individuals without a warrant and has been linked to ongoing concerns of arbitrary detention and torture. The law was widely protested after writer Mushtaq Ahmed, arrested under the act and denied bail several times, died in jail on February 25. Following the protests, the government promised to review and amend the Act if necessary. At a press conference in late December 2021, the Minister for Law admitted that the DSA had been misused and abused and highlighted three steps the government began taking in 2021: dialogue with the UN Office of the High Commissioner for Human Rights (OHCHR); the creation of a committee to explore possible rules to oversee the merit of a case before it is filed; and the creation of a cell of law enforcement agencies to look at complaints before filing them as cases.

Extrajudicial killings, many of which involved the paramilitary police Rapid Action Battalion, the conventional police force, and Border Guards Bangladesh, also continued in 2021. According to Ain O Salish Kendra (ASK), 51 people were extrajudicially killed in 2021, as compared to the 196 extrajudicial killings reported in 2020. In December, the United States imposed sanctions on the Rapid Action Battalion and seven of its former and current officials for human rights violations.

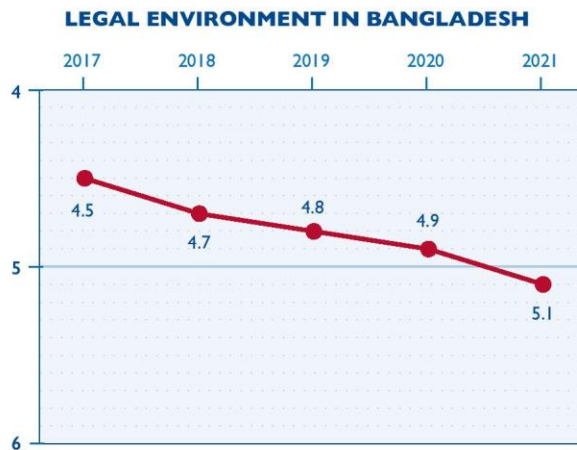
The overall sustainability of CSOs in Bangladesh remained unchanged overall in 2021, with declines in four dimensions and no notable change in the remaining three. The legal environment for CSOs moderately deteriorated in 2021 as CSOs continued to face obstacles, lengthy delays, and bureaucratic harassment in legal processes, including both registration and approval of foreign support. CSOs were hesitant to carry out advocacy campaigns that may challenge the government, especially in regards to policymaking, and the public image of CSOs deteriorated slightly with an increase of negative media coverage. The organizational capacity of CSOs also declined slightly in 2021 as funding cuts limited CSOs’ ability to retain full-time, qualified staff. Financial viability, service provision, and the infrastructure supporting the sector remained unchanged in 2021.

CSOs register under various government departments, making it difficult to determine the total number of CSOs in the country. There are more than 58,000 organizations registered under the Department of Social Services (DSS). In 2019, the Department of Women Affairs reported a total of 15,398 registered CSOs; updated information was not publicly available in 2021. As of December 31, 9,029 trade unions were registered with the Department of Labor, including 142 newly registered in 2021. CSOs that receive foreign donations must register with the Non-Governmental Organization Affairs Bureau (NGOAB). As of April 2022, 2,261 Bangladeshi NGOs and 260 international NGOs were registered with NGOAB, as compared to 2,529 and 259, respectively, in 2020.

LEGAL ENVIRONMENT: 5.1

The legal environment for CSOs declined moderately in 2021. CSOs faced increasingly complicated and delayed registration and renewal processes, while restrictions on civic space more broadly continued to impede CSOs’ ability to operate.

CSOs are governed by several regulatory frameworks. These include the Societies Registration Act (1860), the Trust Act (1882), the Co-Operative Societies Act (2001), the Companies Act (1994), the Voluntary Sector Welfare Agencies (Registration & Control) Ordinance (VSWO, 1961), the Microcredit Regulatory Authority Act (2008), and the Foreign Donations (Voluntary Activities) Regulation Act (FDRA, 2016). CSOs in the Chittagong Hill Tracts must register under the Chittagong Hill Tracts Regional Council Act 1998.



To receive foreign funds, CSOs must register as NGOs with NGOAB and then receive approval for every foreign-funded project. Registration with NGOAB requires approval by the Ministry of Home Affairs and the Ministry of Finances. In 2021, NGOAB canceled the registrations of twenty-two NGOs, a significant increase from the three cancelled in 2020 for legal non-compliance or irregularities. Among the twenty-two, sixteen registrations were canceled for alleged involvement in fraud, corruption, or irregularities; the remainder were canceled for failing to renew their registration on time.

Several circulars issued by NGOAB in 2021 threaten or have already begun to add further complications to registration and approval processes.

In November, NGOAB published an updated Circular of the Prime Minister's Office (PMO). Under that, domestic and international NGOs registered with NGOAB will be permitted to provide grants only to other organizations registered with NGOAB. This imposes several new requirements for rural CSOs and community-based organizations (CBOs) that previously received sub-grants but are registered under other governing laws, not with NGOAB. NGOs must also open a separate bank account for each approved project—an organization that has four approved projects must therefore open four separate bank accounts. The PMO Circular further stipulates that NGOAB will first approve the release of up to 80 percent of funding for one-year projects, with the remaining 20 percent available only after satisfactory completion of the project. This affects all foreign-funded projects, regardless of donor policies. In addition, both domestic and international NGOs must inform NGOAB within seven days of the arrival or departure of any foreign staff member.

Also under that PMO Circular, in a bid to reduce political pressure on CSOs, NGOAB revised FDRA 2016 regulations to prohibit members of parliament (MPs) or elected local representatives from being a member of any NGO's governing body or executive committee.

Other circulars impose mandatory disclosure requirements that may violate NGOs' right to privacy, including detailed monthly reports to district officials, audit reports, and the publication of budget details. In August 2021, NGOAB also issued additional requirements regarding the salaries and benefits of foreign nationals working as officials or employees of foreign NGOs in Bangladesh. The appointment letter submitted to NGOAB in reference to foreign nationals must disclose their actual salaries to allow for the collection of income tax; those salaries should be paid through a Bangladesh-based bank account; and the employee must submit an annual salary statement to NGOAB. Accordingly, the appointment of any foreign national as an employee of a foreign NGO cannot be extended without proof of bank transfer, confirmation of salary, submission of a salary statement, and income tax payment.

NGOAB increasingly delayed approvals of foreign grants in 2021. It also imposed new conditionalities in the process. For example, as in previous years, CSOs were required to demonstrate a letter of intent or commitment from a potential donor in order to apply for registration. In 2021, the November PMO Circular placed a minimum on that commitment, stating that CSOs applying for registration should have a letter from a potential foreign donor committing no less than \$5,000; otherwise, the organization is ineligible for registration. This could be particularly challenging for smaller organizations that rely upon similarly small foreign donations.

Delays in registration also delayed organizations' ability to receive foreign funds—particularly for CSOs working in sensitive fields such as democracy, governance, and human rights. For instance, one CSO working on indigenous and human rights issues in the Chittagong Hill Tracts is registered with the district DSS. Negative reports from civilian intelligence agencies working under the Ministry of Home Affairs, such as the Department of Special Branch and National Security Intelligence, however, have delayed the approval of its registration with NGOAB, making the CSO ineligible to receive foreign funding in 2021.

A December 2021 NGOAB circular threatens to further impose upon CSO operations. Following a directive by the Department of Narcotics Control (DNC), NGOAB mandated that all NGO projects, regardless of their objectives, include anti-drug activities. While this mandate is intended to contribute to a nationwide anti-drug

campaign, the vague mandate that “all NGOs in the country should be involved with anti-drug activities” leaves room for interpretation and a potentially sizable burden for organizations occupied with other work and limited budgets.

Increasing restrictions on civic space more broadly also posed challenges for CSO operations in 2021. As in previous years, the DSA was used to severely limit freedom of expression, stifling dissent and perceived criticism. According to a study by the Center for Governance Study and the Society for Media and Suitable Human-communication Techniques (SoMaSHTe), nearly half of 250 DSA cases were filed by individuals affiliated with political parties, and approximately one quarter by law enforcement agencies; the remainder were filed by other individuals. Many provisions of the DSA fail to meet the standards set out in international law and the Act is frequently used to target the political opposition and journalists. According to a report by ASK, Bangladesh saw a nearly nine-fold increase in cases filed under the DSA in 2021: at least 1,134 cases were lodged against journalists and alleged government critics, compared to 130 in 2020. In this environment, CSOs frequently practiced self-censorship and restricted themselves to activities related to water and sanitation, education, health, and the environment.

CSOs generally are permitted to engage in economic activities by selling goods and services; however, they are required to pay income tax and value-added tax (VAT) on this revenue. Income tax and VAT rates vary according to the nature of goods and services. CSOs’ income from the operation of microcredit activities is exempted from income tax and VAT. NGOs registered with NGOAB are not required to pay any tax on funds received from donors, and when procuring products or services, NGOs must deduct applicable taxes and VAT. CSOs, including NGOs, are also required to deduct part of the income taxes for the salaries of staff who receive taxable income over BDT 300,000 (approximately \$3,500) per annum after including the tax-exempted incomes; that minimum is slightly higher for women and people with disabilities.

CSOs are allowed to engage in fundraising campaigns, and individuals and corporate entities that donate to CSOs focused on any of twenty-two designated public benefit purposes are eligible for income tax deductions up to 15 percent of the donation amount. Through the open bidding processes, CSOs may also enter into agreements with the government to implement various projects.

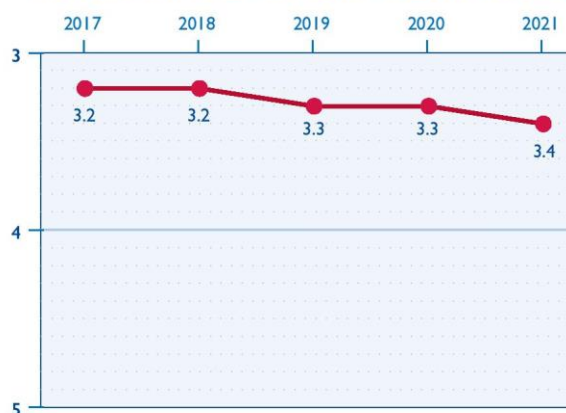
CSOs continue to have some access to legal expertise. Bangladesh Legal Aid and Service Trust (BLAST) and the Bangladesh National Women’s Lawyer’s Association (BNWLA) provide legal support on specific issue areas. Many CSOs, including some at the rural level, have in-house advisors with some legal background, though they are generally not experts.

ORGANIZATIONAL CAPACITY: 3.4

Organizational capacity within the CSO sector slightly deteriorated in 2021, primarily due to challenges in retaining full-time staff. Broad constraints—particularly funding cuts and restrictions on civic space—increasingly pushed CSOs to close, scale down, diversify, or adjust their focus to become implementers of government projects or work in line with government policies. This particularly impacted smaller CSOs that were already struggling with limited resources. COVID-19 restrictions also impeded CSOs’ ability to carry out their strategic plans in 2021, though many were able to continue work online as they had in 2020.

As in 2020, periodic restrictions on travel and public gatherings especially impacted CSOs working with poor and marginalized communities and they continued to struggle to meet with their key constituents, who frequently lacked the technology required for online communication. CSOs’ ability to engage with constituents somewhat improved in 2021, however, as CSOs grew more adept at using technology to ensure continued engagement and, perhaps most significantly, as the easing of COVID-19 restrictions allowed a return to normal operating procedures towards the end of the year. Still, for

ORGANIZATIONAL CAPACITY IN BANGLADESH



some, readjusting to in-person operations took time, and many international NGOs continued to work from home until December.

CSOs determine the needs of their beneficiaries and frequently engage them in the implementation of the resulting activities, though not continuously.

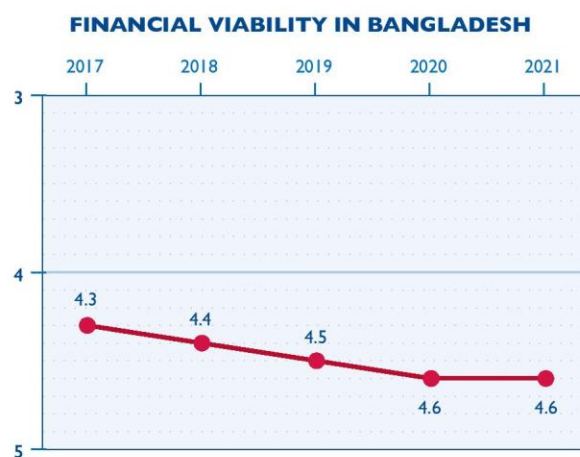
Most large CSOs have well-written strategic plans that articulate clear organizational missions, objectives, and strategies. Strategic planning continues to be difficult for new and small organizations, which instead tend to focus on the implementation of short-term projects. The implementation and development of those plans also depends on the availability of funding, and the increasingly restrictive civic space in 2021 spurred some CSOs to readjust their missions and focus areas in order to implement government projects or be more in line with government policies. COVID-19 restrictions continued to limit CSOs' ability to carry out planned activities in 2021.

Most CSOs have well-written constitutions, which are required in order to register. In general, these constitutions clearly state an organization's purpose and objectives, core values, code of ethics, governing bodies, beneficiaries, management structures, and operational procedures. Larger CSOs typically have more clearly defined management structures and roles and responsibilities of board members and staff. Some large and medium-sized CSOs have highly professional governing bodies, but other CSOs have governing bodies primarily to comply with their constitutions and these bodies only approve documents.

Most CSOs contract staff on a project basis due to their dependence on short-term donor funding, and only a few have core staff members who work beyond project periods. In 2021, dwindling funds spurred worsening staff retention rates. The quality and management of human resources also deteriorated due to limited budgets for training or capacity-building interventions. Staff training is therefore largely limited to project-specific capacity building at the start of new programs. Many CSOs depend on volunteers for the implementation of community-based programs. According to the Charities Aid Foundation's (CAF) World Giving Index 2021, which reports data from 2020, 13 percent of respondents in Bangladesh indicated that they had volunteered in the previous month.

CSOs typically have adequate access to the internet and information and communications technology (ICT), and many larger CSOs have expertise in internet-based information management systems and use modern software to track results and manage their finances. The shift to more remote and online work that began in 2020 continued in 2021, and many organizations continued to develop their technical skills and capacities.

FINANCIAL VIABILITY: 4.6



The financial viability of the CSO sector remained unchanged overall in 2021. Though the amount of foreign funds approved by NGOAB increased, CSOs received notably less of it in 2021 than they did in 2020. The continuing shift toward emergency needs, together with limited local support, also spurred funding cuts for some areas within the sector.

The CSO sector in Bangladesh has long depended heavily on foreign donors, including multilateral institutions like the World Bank, Asian Development Bank, and UN, and bilateral donors such as USAID, the United Kingdom's Foreign, Commonwealth, and Development Office (FCDO), and the Swedish International Development Cooperation Agency (Sida). Given the continued financial impact of COVID-19, however, while the amount of

foreign funds committed to CSOs in Fiscal Year (FY) 2020–21 increased compared to the previous year, it remained notably lower than pre-pandemic amounts. At the same time, though NGOAB approved \$994,729,477 committed to 2,004 projects, only \$779,246,853 was released. The cause of this difference is not publicly available, but experts suspect that it is primarily due to the logistical difficulties brought about by COVID-19, which forced a pause on many planned CSO activities. In contrast, in FY 2019–20, NGOAB approved \$910,800,553 in foreign funding for 1,655 projects, and \$945,804,131 was released (including some funds from the previous year).

Also in 2021, FCDO withdrew from a strategic partnership arrangement with BRAC, one of the largest NGOs in the country, that had previously provided flexible funding totaling £223 million (approximately \$279 million) between 2016 and 2021. This in turn forced cuts in BRAC's previously-significant programming and local support.

In addition to COVID-19 relief, though little data is publicly available, experts suggest that much of the foreign support CSOs have received has continued to shift toward the Rohingya crisis. As a result, traditional service areas such as health, education, gender, and human rights and governance have been particularly limited by the funding shortage. Smaller organizations continued to be most heavily impacted. According to a July 2020 survey by the Citizens' Platform for the Sustainable Development Goals (SDGs), 90 percent of NGOs working at the district level have been short of resources during the COVID-19 crisis.

Local support remained limited in 2021. The government sometimes provides funding to CSOs under specific projects. Though no data was publicly available, this funding generally focuses on health, education, and agriculture, and in most cases benefits CSOs with good relationships with the government. As the government expanded its work in public health, water and sanitation, and combating the spread of COVID-19, CSOs had more opportunities to engage with and mobilize public funds.

Corporate social responsibility (CSR) is still not well developed in Bangladesh, in part because CSOs lack adequate strategies and guidelines to mobilize CSR funds. To encourage CSR, the National Board of Revenue gives corporations tax exemptions for donations in twenty-two sectors. According to Bangladesh Bank reports, CSR spending from banks and financial institutions declined in 2021, dropping from approximately BDT 9.8 billion (approximately \$104 million) in 2020 to BDT 7.6 billion (\$80 million).

Fundraising and local individual support for CSOs also remained limited in 2021, given the ongoing economic crisis. *Zakat*, annual Muslim almsgiving, makes up a large portion of individual giving every year. The Islamic Foundation, which manages the *zakat* fund, collected BDT 35.3 million (approximately \$380,000) in 2021, along with material support for the poor. Individuals may choose the beneficiary of the *zakat*, ranging from orphanages and CSOs to government institutions; in 2021, CSOs like SOS Children Village and the Mastul Foundation ran campaigns to attract *zakat* funding, but their success in that fundraising push is not clear.

Many CSOs seek to identify alternative sources of income to enhance their sustainability, but only a few have been successful in developing social business models. Some large NGOs have continued to become increasingly revenue-oriented by establishing social enterprises, introducing fees for services, and renting out training centers. In 2021, however, social enterprises continued to be somewhat impeded by COVID-19 lockdowns.

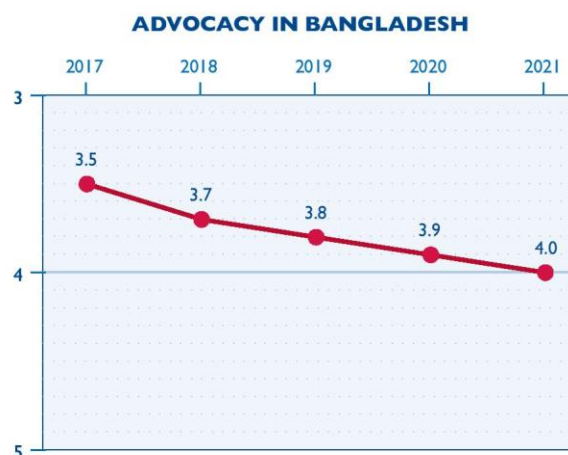
Large CSOs have systematic financial management systems, and most local NGOs undergo independent audits to meet NGOAB requirements. However, only a few large national CSOs and international NGOs regularly publish their annual audit reports.

ADVOCACY: 4.0

CSO advocacy deteriorated slightly in 2021 as CSOs continued to have limited access to government decision-making processes and engaged in greater self-censorship.

Typically, CSOs participate in steering committee meetings of various ministries as well as district and sub-district coordination meetings. Since the onset of COVID-19 restrictions in 2020, however, CSOs have had few opportunities to hold discussions with government authorities and policymakers. This negative trend continued in 2021, even after the lifting of COVID-19 restrictions in August.

However, in a few areas, such as socio-economic development and health, the government welcomed input and cooperation from civil society. Issues related



to the SDGs were particularly fruitful opportunities for CSO cooperation with the government in 2021. For instance, the Citizen Advocacy Platform on SDGs secretariat at Center for Policy Dialogue (CPD) held dialogues to take stock of SDG progress in the context of COVID-19 and consider the way forward for government and CSOs.

Cooperation on gender issues increased in 2021 with the government's establishment of service desks at police stations to provide support for victims of domestic violence. Memorandums of understanding (MoUs) signed between several CSOs and local police stations established CSOs as an initial point of contact for victims. This both recognized the value of CSO work and provided more opportunities for them to advocate and engage on issues of women's rights, trafficking, and violence against women. This improved cooperation and role for CSO advocacy was all the more important as the need for such support increased in 2021.

Also in 2021, with support from the Global Health Advocacy Incubator, the CSO Progga was actively involved in the drafting of and advocating for a new government regulation to limit trans-fat, making Bangladesh one of at least forty countries that have adopted trans-fat regulations in line with World Health Organization recommendations.

Beyond these areas of shared interest, however, CSOs remained hesitant to get involved in advocacy that may run counter to government policy, and therefore increasingly engaged in self-censorship and became more strategic about what issues they did address in 2021. Given the environment of impunity for crimes against or harassment of voices of opposition, those CSOs working on rights and governance issues were especially more likely to limit public criticism of the government.

In large part, this rise in self-censorship was worsened by the significant increase in DSA cases: as discussed earlier, in 2021, at least 1,134 cases were lodged against journalists and alleged government critics, compared to 130 in 2020. High profile incidents such as the death of writer Mushtaq Ahmed in jail and the detention and torture of cartoonist Ahmed Kabir Kishore, also in February 2021, spurred CSOs and activists to continue to demand the repeal of the vague sections of the DSA. While CSOs like SoMaSHTe researched and monitored the application of the DSA, journalist associations such as the Bangladesh Federal Union of Journalists and Dhaka Reporters Unity staged protests and held dialogues with government officials, including the Minister for Law, Justice, and Society and the Minister of Information. In December, the ongoing advocacy against the DSA achieved some success when the government confirmed that journalists could not be arrested simply on an allegation; rather, that allegation must first be verified.

In 2021, CSOs continued public policy advocacy, online and in-person, on various issues, including the safeguarding of children. For instance, in December, BLAST, Save the Children Bangladesh, and Prothom Alo held a roundtable and called upon the government to amend the Children Act 2013 and ban cruelty towards children, including inhumane and humiliating physical and mental punishment.

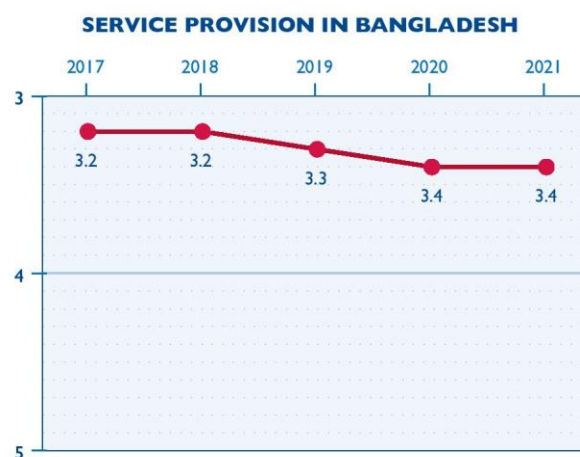
In 2021, as in 2020, local, national, and international CSOs did not actively advocate for CSO law reform.

SERVICE PROVISION: 3.4

CSO service provision remained unchanged overall in 2021. Though CSOs were able to somewhat expand their reach and activities with the easing of COVID-19 restrictions, financial challenges continued to limit their ability to meet the large and evolving need for services.

Typical CSO services range from areas such as health, water and sanitation, and housing, to education, microcredit, and agricultural technical skills. In 2021, particularly before and after the reimposition of COVID-19 lockdowns, CSOs were able to resume some of their regular services that had been paused in 2020. During these periods, CSO personnel were able to move more freely and permitted to hold in-person meetings.

Regardless of the continuing financial scarcity, some CSOs were able to reorient their project strategies, activities, and support in order to expand their reach and provide more services to meet the immediate needs of their constituents in 2021, especially the most urgent needs brought on by the impact of COVID-19. For instance, Manusher Jonno Foundation (MJF), which primarily focuses on promoting rights and good governance, in 2021 continued to shift some of its efforts to providing communities with personal protective equipment (PPE), sanitizer and disinfectants, and nebulizers.



CSOs continued to strive to reach their key communities, though these efforts remained only moderately successful given periodic COVID-19 restrictions. In 2021, CSOs continued to work through local volunteers, local government representatives, and virtual platforms such as texts, group calls, and social media. As many of their regular activities and programs remained limited, postponed, or shut down, CSOs also worked to disseminate knowledge and information through virtual sessions.

While CSOs strive to be responsive to the most urgent needs of their constituents and communities, they have struggled to adequately respond to the evolving nature of those needs, particularly among the poor. In 2021, CSOs were able to adjust some of their regular programs in order to provide tangible support such as food, cash, and

referral services, but recent demands for loans and educational and technical skills, for instance, have not been sufficiently addressed.

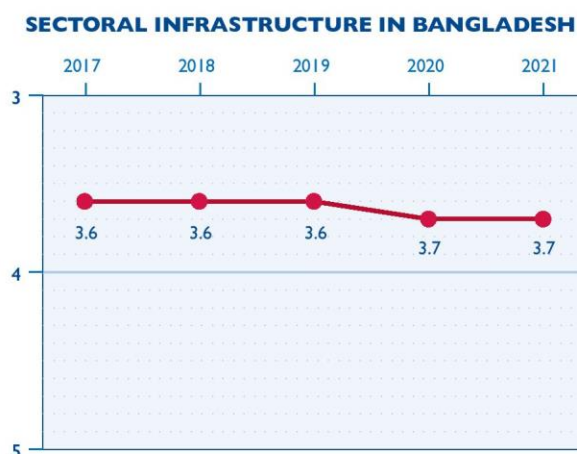
CSOs rarely charge fees for their services, as their target groups are unable or unwilling to pay for services and the public generally expects CSO services to be free. CSOs generally provide services without discrimination in regards to race, gender, or ethnicity.

CSOs working on socio-economic development programs were sometimes able to work alongside the government, and the government recognized the value of CSO contributions in that sector. CSOs attempting to implement projects in areas outside of socio-economic development, however, faced frequent restrictions and received little to no government recognition or support. Government officials were particularly critical of CSOs working in the areas of human rights, governance, and democratic reform.

SECTORAL INFRASTRUCTURE: 3.7

The infrastructure supporting CSOs in Bangladesh remained unchanged overall in 2021.

Large CSOs such as BRAC, Thengamara Mohila Sabuj Sangha (TMSS), Proshika, the Association for Social Advancement (ASA), Dhaka Ahsania Mission, and Caritas Bangladesh typically offer CSOs training, workshops, and meeting space. In 2021, many of the centers run by these organizations were able to re-open partially due to the gradual withdrawal of the pandemic restrictions. CSOs began to transition back to in-person operations and renting out venues for training and other capacity-building events. However, as CSOs focused on reinvigorating their core programs in 2021, most were not able to extend their operations to more actively engage with or support the broader sector.



CSOs providing training and other capacity-building programs also continued to face difficulties in 2021, particularly while COVID-19 restrictions were in place. As those eased in August, some began to return to in-person meetings and trainings. Domestic and international organizations such as MJF, Care International, Oxfam, Christian Aid, and UN agencies continued to provide CSOs with grants to build their technical and organizational capacities. However, these services still do not fully meet CSOs' needs and tend to benefit larger CSOs.

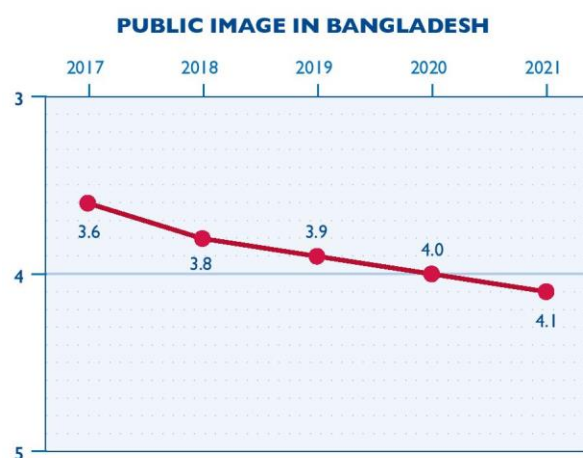
Sub-granting from large CSOs to smaller CSOs also continued to decline in 2021 due to the broader funding limitations. Such local grantmaking threatens to be further limited by the new stipulation under the PMO Circular that NGOs registered with NGOAB may only sub-grant funds to organizations also registered with NGOAB.

CSOs belong to many networks, coalitions, and forums, including Citizen Platform of SDGs in Bangladesh, the Right to Information Forum, Kapaeing Foundation, Bangladesh Adibashi Forum, Shishu Adhikar Forum, and the Girl Child Advocacy Forum. While there are several issue-based networks, due to funding limitations, all struggled to have real impact in 2021. Previous collective actions on environmental issues, gender, disability rights, and the rights of the indigenous and Dalit communities were largely inactive in 2021 as CSOs instead focused primarily on survival.

In late December 2020, BRAC led the creation of a new platform that aimed to bolster collaboration across the sector and with the government on issues ranging from COVID-19 relief to climate change. No information on progress through the platform in 2021 was available.

CSOs continued to form partnerships with international NGOs, UN organizations, and ministries in sectors like health, climate change, education, nutrition, and child and women's rights. Experts also observed that, in 2021, several donors preferred to fund projects either through government agencies or with CSOs working alongside government projects—sometimes bypassing more experienced CSOs or those with greater capacity in the process—further encouraging such partnerships.

PUBLIC IMAGE: 4.1



The public image of the CSO sector deteriorated slightly in 2021, primarily due to an increase in negative media coverage.

Media coverage continued to be mixed in 2021 but deteriorated overall. Some outlets, both national and local, continued to cover positive aspects of CSOs' work, particularly in regards to COVID-19 prevention and relief efforts. However, more negative attention was placed on CSOs' forced collection of microcredit installments in the midst of the pandemic to cover their own financial losses. Media coverage of CSO work was somewhat limited at the local level in 2021, and those organizations that did receive coverage tended to be the larger CSOs. Given the overall and increasing culture of self-censorship, national and local media also tended not

to cover the increasing restrictions facing civil society and CSO operations in the country.

The public perception of CSOs remained largely negative in 2021, unchanged since 2020. With the start of the COVID-19 pandemic in 2020, CSOs' difficulty in meeting the growing need for essential services spurred criticism. In 2021, even as CSOs like TMSS and Gono Unnayan Kendra (GUK) drew from internal resources to try to meet those urgent needs, public attention turned instead to speculation of CSO involvement in corruption, bribery, and noncompliance with national standards. Negative perceptions also arose from some organizations' forced collection of microcredit installments during the COVID-19 lockdown. Human rights organizations continued to be criticized in 2021 for not taking a more active stance against violations by government actors, particularly in the Chittagong Hill Tracts.

The government continued to recognize the contribution of CSOs to social development, especially their work in poverty reduction, health care, education, and microcredit programs, and largely remained supportive of those interventions in 2021. CSOs working in the areas of human rights, governance, and democratic reform, however, remained targets for criticism and bureaucratic harassment.

CSOs continued to utilize their websites, online platforms, and social media to promote their missions and activities. Social media continued to gain traction in the country as a platform for civil society and activism. For instance, in response to the communal violence that took place during the Durga Puja Hindu festival in October,

CSOs used social media to raise awareness on behalf of the victims and speak against the attacks. This type of proactive engagement, alongside the use of social media to report about their activities and outcomes, helped CSOs to connect with the wider society.

Different registration authorities require CSOs to submit various reports. As in previous years, many CSOs published periodic and annual reports, including activity reports and financial information.

Disclaimer: *The opinions expressed herein are those of the panelists and other project researchers and do not necessarily reflect the views of USAID or FHI 360.*

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