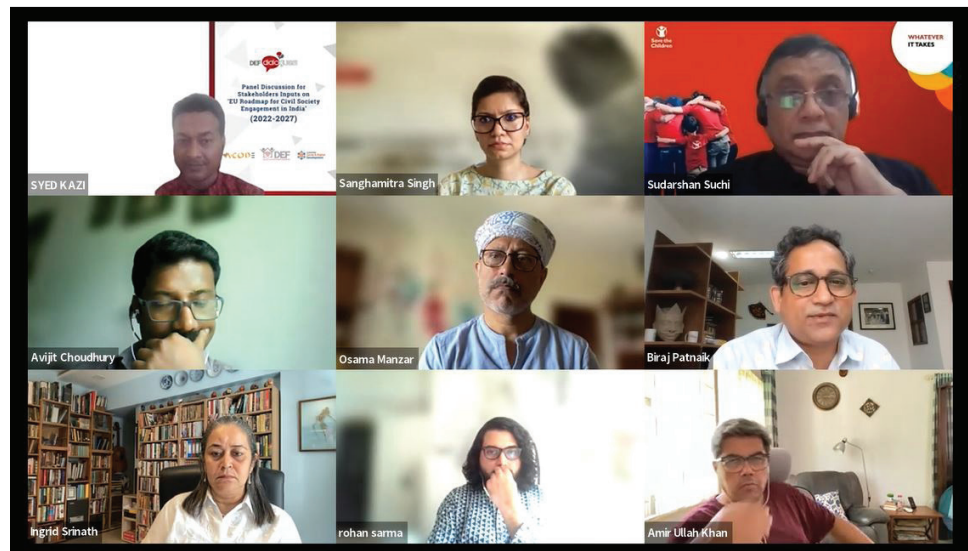


Brief of CSO Partners' Consultation For

'EU ROADMAP FOR CIVIL SOCIETY ENGAGEMENT IN INDIA (2022-2027)'



[Held on 28th May, 2022]

Organised by the **Digital Empowerment Foundation** (DEF) and the Council for Social and Digital Development (CSDD)

June 2, 2022



'EU ROADMAP FOR CIVIL SOCIETY ENGAGEMENT IN INDIA (2022-2027)'

CSO Partners' Consultation Brief

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1. BACKGROUND

This report draws from the stakeholders' consultation meet on the new 'EU Roadmap for civil society engagement in India (2022-2027)' which was organised by the Digital Empowerment Foundation (DEF) and Council for Social and Digital Development (CSDD) in partnership with key Civil Society Organisations working on varied developmental issues in India. The virtual discussion was organised on 28th May 2022 between 2:30pm and 5:30pm on Zoom.

Key questions such as 'whether the legal, regulatory, financial and institutional environment in India is enabling the CSOs to function and scale-up?', 'what kind of policy dialogues - both domestic and international - has the key CSOs participated in?' and 'what are the general expectations of the civil society from the European Union in relation to their engagement with CSOs in India?' - were discussed in-depth.

CSO PARTNER ORGANISATIONS & EXPERTS

#	Name	Organisation	Designation	Main State of Operation	Key Sector/s
1	Mr. Biraj Patnaik	National Foundation for India	Executive Director	Multi-States	Multi-sectors (Education, Culture, Livelihood)
2	Mr. Anshu Gupta	Goonj	Founder & Director	Multi-States	Multi-sectors (Emergency relief, rescue, basic amenities)
3	Ms. Ingrid Srinath	Centre for Social Impact and Philanthropy, The Ashoka University	Director	Haryana	Research, Advocacy and Capacity Building
4	Mr. Sudarshan Suchi	Save the Children	CEO	Multi-States	Multi-sectors with focus on Children
5	Mr. Avijit Choudhury	Pradan	Integrator (Resource Mobilisation, Partnerships & Communications)	Multi-States	Multi-sectors with focus on rural development, livelihood and others.

#	Name	Organisation	Designation	Main State of Operation	Key Sector/s
6	Mr. Rohan Sarma	Samhita	Head of Research, Knowledge Management and Strategy (RKMS)	Multi-States	Multi-sectors
7	Dr. Sanghamitra Singh	Population Foundation of India	Lead Policy and Programmes	Multi-States	Multi-sectors with focus youth, children, women and others
8	Dr. Amir Ullah Khan	Centre for Research on Infrastructure Development & Policy	Research Director	Telangana	Research, Advocacy and Capacity Building
9	Osama Manzar	Digital Empowerment Foundation	Founder & Director	Multi-States	Digital Inclusion, Internet Access, Entrepreneurship, Education and others
10	Dr. Syed S Kazi	Council for Social and Digital Development	Director	North East India	Research, Advocacy and Capacity Building

2. Introduction

The European Union (EU) is a longstanding global champion for civil society as development actors in their own right. ***Civil Society Organisations (CSOs) are vital to the attainment of human rights, the rule of law, liberal democracy, peace, conflict prevention, resilience and stability and are key partners in devising and implementing policies and programmes*** that meet people's needs, reduce inequalities, and fulfil the central commitment of the 2030 Agenda to leave no one behind.

The importance of civil society partnerships was further strengthened in the European Consensus on Development 2017 and the 2017 Council Conclusions, underlining that civil society should be mainstreamed in all external instruments and programmes and in all areas of cooperation. Besides, the **EU Thematic Programme for Civil Society Organisations 2021-2027** provides the most updated framework and orientation for civil society engagement from an EU perspective.

In order to deliver on the EU Policy to engage with civil society in external relations, the **EU Delegation to India (EUD India) developed the first 'Roadmap' generation in 2014**. Priorities of the EU Country Roadmap were based on the 2012 EU policy "The roots of democracy and sustainable development: "Europe's engagement with Civil Society in external relations" as well as the analysis of status of civil society and EU engagement in India.

EUD India held/participated in various consultations with CSOs on the legal and regulatory issues as well as on thematic consultations related to SDGs implementation in India. In 2018, once again, the EU Delegation held a series of consultations with a wide range of CSOs with a view to further update the Roadmap with particular focus on adoption of the Roadmap to Agenda 2030 (SDGs) framework linkages to current EU-India strategic priorities and the enabling environment and gaps and priorities the EU should be addressing for a stronger and result oriented engagement with Indian CSOs.

At the 15th European Union – India Summit on 15th July 2020, Leaders endorsed the "EU-India Strategic Partnership: A Roadmap to 2025" as a common roadmap to guide joint action and further strengthen the EU-India Strategic Partnership over the next five years. In a complex international environment, the European Union and the Republic of India, both "unions of diversity", sharing values of democracy, rule of law and human rights, are equally convinced of the necessity to preserve the rules-based international order and effective multilateralism. The EU and India have a common interest in each other's security, prosperity and sustainable development. They can contribute jointly to a safer, cleaner and more stable world.

More recently, on 1 December 2021, the EU launched a new Global Gateway strategy. The Global Gateway will guide future EU investments in the years to come, including in India. Climate change and clean energy, Digital transition, Transport, Health, Education and Research are key pillars

of the strategy. The aim is that the EU at large (EU institutions, Member States, private sector, local authorities, civil society...) contribute to larger investments in those critical sectors, to reach higher and deeper impact, at scale, for the benefit of people and the planet, in India, and beyond India.

It is in keeping with the above context that **EUD India held consultation in May 2022 with CSOs cutting across various thematic sectors, focussing on EU-India mutual areas of interest and sectoral priorities.** The outcome of the consultation will be pertinent towards **drafting the new EU Roadmap for civil society engagement in India, for the period 2022-2027, in key policy dialogue areas of the EU-India Strategic Partnership and related Roadmap 2025.**

3. Consultation Output: Enabling/Disabling Environment for CSOs in India

A key agenda of the consultation was to discuss the enabling/disabling factors related to legal, regulatory, financial and institutional aspects for CSOs in India to function as well as adapt by advancing their own accountability and effectiveness as independent development actors in the recent times. The following are the summary of the consultation output related to the given issues and challenges:

- **Kind of Repressed Environment:** There are reports, for instance, the recent CIVICUS report that has categorised India as **repressed** and it is on the list of 5 countries that CIVICUS has put on its watch list where they fear that development is worsening rapidly. This description of 'repressed' is in consonance with other global indexes whether it's about human rights, internet freedom, religious freedom, or freedom of the press - there has been a steady deterioration in these domains over the past few years in India. This has also caught the attention of various UN bodies, the international commission of jurists etc. These are areas of concern.
- **Uneasy Regulatory Framework:** For CSOs, the problem starts with the regulatory framework – it appears fragmented, incoherent and appears to allow authority to be imposed in ways that are arbitrary, opaque, and unaccountable and offers no redress. This has reflected in the slew of regulatory regimes whether it's the various arms of the home ministry or tax authority of the finance ministry or CSRs under the Ministry of Corporate Affairs and others. These are in the form of requirements which are in addition to what a for-profit entity will be subjected to. These requirements embody a 'regulatory minefield', where trying to avoid one thing would blow up the other as it goes. This has made it very difficult for vast numbers of CSOs which are small with under 9 staff or less than Rs. 10 lakh revenue to comply with these requirements. Then there are reported and visible instances of targeting of actors, academics, activists and even comedians under laws like Unlawful Activities (Prevention) Act, 1967 (UAPA) which has a chilling effect on CSOs and any form of dissent, for even people who might be willing to fund work on any of these domains.
- **FCRA Amends Rendering Impossibility:** Due to Foreign Contribution (Regulation) Act, 2010 (FCRA) amendments, any rights-based work whether through campaigning, policy advocacy, research etc. has been almost rendered impossible. Regarding the enabling environment, the brunt of FCRA has been especially borne by the small organisations. The FCRA funds are of a particular nature which allows one to engage in projects which are long-term. With FCRA amends, this sustainability has been hugely affected. Another issue is of interpreting the various provisions of the FCRA and trying to navigate through it with regulatory

and legal remedies to resort to. This is more for CSOs out of major cities. With FCRA amendments, domestic funders are also increasingly becoming wary of giving funds.

- **CSR Amends and Resultants:** CSR funding on the other hand has been designed to fund short-term, easy to measure, service delivery type activities. The new CSR amendments involving impact audits and underspending have just exacerbated this service delivery orientation. The sustainability of CSR fund has been a challenge. So a challenge is that if you compare foreign funds and domestic funds, the quality of money is also very different. However, this whole ecosystem that the NGO has regarding the community base which has been built over a period of 20-30 years, the CSR investments ride on it which is yet to be appreciated by them. There is this realisation that programmes need to be long-term and nothing can be achieved in one year. Even though CSOs have programmes running for 5 years, due to changes in the CSR law, one has to face certain penalties due to the very short nature of books of accounts and output based interventions.
- **Fund Raising:** Regarding fund-raising, trying to raise domestic funds through philanthropic avenues since the FCRA amendments were introduced has been a challenge. However, it is not easy to navigate around this system, especially based on competitive grant opportunities which are often done in the case of international funding opportunities. Trying to raise funds through CSR opportunities which are outcome-driven, many CSOs face problems because they may not have direct outcomes or impact or numbers to show. Consequently, CSR grants do not allow flexibility.
- **Are Private Philanthropies wary?:** Moreover, private philanthropy are seen to be subjected to intimidation in case anyone tries to support democratic freedom or media freedom or any of those allied areas. As it appeared, this was intensified during COVID through overt and covert pressure to divert resources to funds like 'PMCare' Fund which cut off 50 per cent of funding which would have been otherwise available to civil society organisations.
- **An atmosphere of fear:** An atmosphere of fear has been cast over the sector which is making CSOs to self-censor in order to avoid regulatory reprisal. Or else this can make funding impossible not just from international funders but also from domestic funders who fear that any association with any such NGOs / CSOs would not do well to them.
- **Fund Raising from Public Difficult:** Apart from institutional funding, raising funds from the public has also been made difficult. Over the years, taxing benefits for charity have been progressively withheld, even a 50 per cent deduction which can be claimed under 80 G, with a few exceptions under 39 A and 39 C. Even this was not evident during the pandemic when it could have been expected that some of these constraints on FCRA would have been relaxed, or some increased

donations would be made which has been usually the case during the past disasters, for example, the tsunami or the Gujarat earthquakes. This is in sharp contrast with countries like China and Russia. Other countries went even further and either created special support schemes for CSOs or by providing CSOs with the same type of protection that they offered to businesses. In India, not only any provision was created for CSOs the way it was created for businesses but the power tilted further in favour of say PMCare Fund because that could offer 100 per cent tax exemption since it did not require eligibility under both FCRA and CSR.

- **Institutional Limits:** In academia, there have been challenges like the ways of withholding permissions, the effect of those seems to limit ability to capture and report our data authentically, to provide any serious critique of policy and limit students from organising discussions and dialogues. On top of that, academia is not allowed anymore or de-incentivised from producing any credible data which is comparable to the credibility of official data through delay, suppression and distortion of data. This lands the institutions in a situation where any critical analysis of policy is not feasible anymore.
- **Media Role Play:** Another edifice of this restriction is provided by the media which is either co-opted into amplifying government propaganda and complicit in the demonisation of the civil society or silenced by being subjected to threats in the form of tax raids on media owners and intimidation of their funders.
- **EUD in India:** Having recognised and acknowledging that the EU is a political block which is possibly the most powerful in the world, one cannot talk about civic space or CSO in India without looking at how the EU reacts to the question of India. Many countries are worried about India without doing much about it primarily because of geopolitical and geostrategic interests. The larger questions are not going to be sorted out by support from the EU or other external actors because it's an 'Indian' problem which 'India' has to resolve. The EU can however play a role in backing the CSOs in the context of the eroding enabling environment in matters of the legal, regulatory and financial constraints in India. Are they willing to back civil society on the questions of FCRA? Laws like FCRA, PMLA or UAPA fall in the basket of laws which broadly fall under the Financial Action Task Force (FATF) recommendations and particularly recommendation 8. India is up for review in 2023 which will include a peer review. The EU is not a part of this but certainly as a part of FATF they have certain obligations to ensure that recommendation 8 which is on civil society being used for money laundering and anti-terror laws and has subsequently been battled down from 2011 onwards, Indian authorities can be engaged if these laws are not amended.
- **Feeling of Draconian Laws:** The number of NGOs today who are being charged under Prevention of Money Laundering Act, 2002 (PMLA) is seen as draconian and inhibits individual's liberty and ability to

operate their own finances than before. It does not matter that this law was not introduced to be used against civil society actors. The issue is not about the enabling environment or the absence of an enabling environment. It accrues to the manner of targeting individuals and organisations and the fact that much of civil society has decided to stay away from this instead of indulging with these issues within a reflecting space.

- **THE NITI AYOJ:** is somehow trying to interface between the government and the CSOs by creating certain forums. But there are challenges in 'walking the talk'. However, the aspirational district that they have created is finding a lot of traction in the CSR space. In terms of this there is a lot of scope of working with the government and multiple NGOs can come together to work towards the various issues.
- **CSOs Diminishing Space:** Regulations are increasing and it's getting very difficult but at the end of the day, it is very important to continue the conversation. Unfortunately, there is no space for reflective conversations for CSOs as a group to reflect. This is also a problem with the CSO boards where people from the grassroots community that the CSO seeks to serve are also barely represented.
- **Implementation and Definitional Issues:** Back in 2010, before the CSR became an act in 2013, it was a mandate for the public sector enterprises. The idea behind this was how these enterprises will fund the NGOs. The process entailed bringing in 'good NGOs' and 'sanitised NGOs' in the fold. Firstly, by good, the government meant the large-scale organisations whose financial reporting and governance is in place. In that regard, a critical question that comes up is that until and unless you work with the grassroots organisations who are involved in the process of the actual impact, how will anything change? Secondly, in regard to the 'sanitised NGOs', how can one create an impact without getting their hands dirty? For instance, the backward regions under the now discontinued BRGF, are areas where development literally have not reached yet. On top of that, the companies think that the pockets for intervention are in the big cities. However, these are already saturated areas.
- Another aspect is, for 35 years or so the civil society space is sort of frozen in time. CSOs just appointed themselves as CSOs without looking at who else sees themselves as CSOs. The definition and engagement with this question are very critical which are often avoided.
- **CSOs and Leadership Challenges:** There is a problem with leadership itself in the CSO space. Most of these CSOs are led by really charismatic founders. But no representation from the grassroots community can be seen. So institutionalisation is weak.
- NGOs over the past few decades have grown and become stronger but the communities that these NGOs engage with have either

remained in the same place or are worse off. Very few big shifts have really happened there. We have not questioned these aspects. CSOs are people who have not traditionally collaborated. The bulk of them have been competitors in terms of having territorial rights. This is our reality. The government is obsessed with control but NGOs too are not far internally. So many NGOs work on issues of gender and have social stands based on those values but some of them have been caught violating those same values internally. The current system (CSR, FCRA, current government) has caught all of the CSOs into their own weaknesses and led them to divert away from all their attention and resources.

- **Power Imbalance:** Another problem is the power imbalance between the donor and the CSO. It's important that the latter see themselves beyond just being fund receivers and the former as mere fund givers.
- **Challenge getting bigger:** The enabling environment is ironically supposed to be an environment within which the civil society would flourish - The challenge for CSOs has gotten bigger which extends beyond working for causes. These are the messages that policy and the economic environment are sending out to CSOs. Secondly, victim bashing is getting a bit worrisome within the civil society space. This is not the time to indulge in finger-pointing. This is the time to become empathetic and try to understand what is happening or what went wrong. These are times of great uncertainty. The three institutions that have still held out - English print media, bureaucracy and civil society. This is also the time to speak up.

4. Consultation Output: Better CSO Participation through Policy Dialogues

The other key agenda of the consultation was to critically delve into how CSO's participation in strategic advocacy as key stakeholders in the governance processes can be made better. Some of the critical discussions were held around – CSO's participation in domestic policies and international processes; the role of CSOs, its contribution and lead within sectoral priorities; as well as emerging areas of involvement like climate change, circular economy, gender equality and women empowerment, and youth empowerment. The following are the summary of the consultation output based on the given topics:

- **Sectoral Priorities for CSOs:** *In terms of the sectoral priorities related to various issues especially around gender in which India fares poorly, what role do we as CSOs play in that especially towards shaping policies?* There has been lack of gender segregated data from the past emergencies such as ebola or zika to draw parallel with COVID-19. Even in the case of issues such as vaccine hesitancy there was barely any data that shows a clear divide in terms of how men and women are reacting differently to it. This was just an example to explain in a nutshell that many times CSOs have gone to the government or policy makers using the data that is available there. Even though that data is publicly available to CSOs, that is the government's data for instance the National Family Health Survey (NFHS), it falls upon CSOs to be able to interpret that data and use it to engage with policy makers. For example, in 2021, the Population Foundation of India (PFI) was involved with the UP government in drafting the UP population policy and simultaneously a bill was introduced which opted to coercive measures to curtail population. PFI engaged with the government and media based on the given data to argue why that bill was not the best measure towards population control. In a nutshell, CSOs ought to rely on evidence based strategic engagement which works well for them.
- **Are CSOs welcomed?:** *Are CSOs welcomed stakeholders with enough negotiating power towards shaping policies?* – For example, Pradan and DEF have been part of the core group of many policy dialogues such as National Livelihood Mission or BRLF or CSC or Digital Inclusion in India. CSOs have tried to engage with the government at many levels and there is a lot of scope to engage at the state level. These state governments are taking on leadership roles and CSOs must overcome their mental map which only looks at the central government. There are State bureaucracies who have shared that they have resources but they need technical support to create programmes. More than policies therefore, CSOs should look at programmes because policies are ultimately translating into programmes. Another thing is CSOs talk about the role of civil society in policy shaping. But one seldom talk about the role of communities in policy shaping. And can the

communities be seen as stakeholders of the programmes and not just as mere beneficiaries. The system needs to become accountable where they receive feedback from the stakeholders. District magistrates are willing to collaborate with the local and small NGOs. This should be taken up by the CSOs.

- **Change in Policy Language:** *Given the atmosphere one is living in now, is there a change in the policy language that CSOs need to be aware of?* - Two elements of policies - firstly, traditionally what unifies all governments is 'big is beautiful'. In the policy space CSOs need to believe that small can also scale-up. Secondly, policies instead of being written as boring treaties can focus on the specific deliverables. And how the space of translation of policy into action can be a shared space where CSOs also participate.
- **EUD and Deepening Democracy:** The EU should definitely work on the agenda of deepening democracy in its many manifestations. That will allow addressing all the woes. Many new actors will also join the space as active citizens.
- **Issues in Policy Inputs:** *When we speak of inputs into policy, there is that sense that maybe the government does not want to listen to the points or rather listen to sugar-coated inputs. Is there a fundamental issue there?* - At the policy level, there is an evidence-based want for input. However, today there is a trend where even the corporate leaders accept that the data is fudged and they want to hear stories. Now storytelling does not mean fiction. But rather a want to engage with human beings. So, the problem also lies with how a lot of non-profits pitch themselves. CSOs need to therefore firstly understand the triad (the market, the government and the donors).
- **'Diversion of CSOs':** Are CSOs diverting from core focus because resources are available elsewhere? May be. For example, while trying to understand the impact of an organisation working on transgender rights, the community members said that because funds are available for Swach Bharat the focus of the organisation has gone there and not into their rights as people belonging to a marginalised group. A lot of communities by themselves are questioning the work of CSOs in today's date. NGOs are not research organisations but because funding is too tight, the NGO tries to be a jack of all trades. Consequently, implementing agencies should understand that they are good at implementing and cannot do research. Within the civil societies there are two types of organisation - the ones that stemmed out of grassroots or organic movements and many of these are voluntary; the new school is more tech-friendly and relies on tech-managerialism. The latter is more familiar with the current language. Consequently, development is not just a process where humans are involved but rather it is something that needs to be managed and thereby there are development managers.

- **Do you see a bias towards technology** *in the current mould of government and the relationship between government and CSOs i.e., when you give technology based solutions are people listening to you?* - Yes, all the policy makers have a welfarist outlook towards development through technology. But since they do not have any idea how technology can have an impact at the grassroots level including rights-based, they imply technology as an exclusionary based implementation rather than inclusionary. Tech-based data only shows the graph going up without showing how many people were excluded. These exclusions are rights-based and not development based. Currently, the policy planning is tech-driven and not people-driven tech intervention. In a country like India, where policy is tech-driven but the infrastructure is not ready, such considerations are very important. CSOs in that way can play the role of telling them that this policy is exclusionary or that policy violates rights etc. CSOs also require technology literacy. Because if they are not, how will they know how tech is affecting policies? States are coming up with AI driven databases based on the information available from all the schemes. However, those databases are of highly exclusionary nature. Data errors are exacerbating these exclusions.
- **Policy participation structures are missing?:** Today it appears there is little space for policy-level intervention at the national level. We don't have the political opportunity structures like National Advisory Council or Planning Commission in terms of making large-scale interventions but just service-delivery. However, the policy space is still very vibrant for the CSOs at the state level. Second, outside the rights-based framework you can still talk to the central government for service-delivery. Third, only we don't constitute civil society. There are organisations like Sewa Bharti under the wing of RSS who have all the policy space to make an intervention.
- The kind of micro-macro linkages that enabled the national food security act or the right to information act or the right to education act that flowed out of grassroots campaigns and became national-level policies - are no longer possible today. The institutional spaces outside the formal structure of the government are no longer there. Now it is very difficult to talk about these right-based issues. The media for example cannot show a series on 'the republic of hunger' or 'RTI' even on the most progressive channels.
- The EU can do a lot of interventions where organisations from India can assist them in countering democratic backsliding in India. At another level, unfortunately, there was a space earlier where CSOs along with the government could counter some of these measures at the WTO but that space is also gone. It would be really important to work with organisations working with Muslim, Dalit, and Adivasi leaders for collectivising of civil society in India. Much of the dialogue could be facilitated by the EU from people-to-people contacts.

- **Need the Soul of Social Work:** In the current scenario, we need people with the soul of social workers. Right now the entire space has been taken over by corporations. When everything becomes data-driven and social impact is also assessed on the basis of that then there is a problem. Nevertheless, we always talk about the negative and seldom talk about the positive. It is very important for us to talk about the narrative, come out with positive data, the impact data of the sector per se. How we used to work earlier was way more impactful and better than the present way of working. We also need to understand that this is a with-covid work and try to understand what changed, what worked and what did not work. The grassroots institutions led the most impact from within this civic space ecosystem. When one big organisation is killed, hundreds of smaller organisations will be killed too. No one is talking about the issues that the grassroots organisations are trying to tackle. In a nutshell, social workers are what we need.
- **CSOs becoming Extinct in regions like North East India?** The CSO space in North East (with 8 strategic landlocked States) has always been raw and extremely limited in terms of voice, capacities, work, representation, scale and engagement capacities at State or regional levels. There has always been a lack of finance flow, fund issues, technical capacity gaps, and other institutional and governance issues (including getting regulatory or administrative support in-licenses etc. locally). With the recent FCRA and CSR amends, the region is witnessing the phasing out and winding up of CSOs. The threat is one day there won't be any credible CSOs in the region to be traced to take up social work/development work. Special efforts are required on a priority basis to stop this reversal.
- **Five quick points:** 1) The intersecting idea about policy and shrinking space: So many policies which were drafted decades back would be drafted radically different today. For instance, In 2017 CSIP (Ashoka University) reviewed all previous recommendations, consolidated them and provided a consolidated policy recommendation, including self-regulatory mechanism review; 2) From that era when civil society was a mandatory sector to be consulted, we have reached a point where just 31 members committee of voluntary organisations are arbitrarily selected by Niti Ayog with a cut-off that says only service-delivery organisations can be members; 3) In multiple forums, it is no longer possible to use certain terms like human-rights or governance or accountability. Similarly, in the CSR law the way civil society is defined, the agency has shifted from organisations that deliver services on the ground to the organisations that fund it. Civil society organisations refer to themselves as implementing agencies; 4) Policy influence is still possible by certain groups, in certain areas, at certain levels. For example, in terms of the migrant workers during COVID, significant impact was made at the policy level. Though we don't still have a comprehensive social protection system that we should have gotten post-COVID but we do have some incremental changes. That is

possible when an organisation or a group of organisations is able to combine grassroots authenticity with good research data collection and advocacy; 5) Most hazardous thing a CSO can do today is participating in a global forum. There is no bigger crime in front of the government than speaking the truth at a UN forum or somewhere else.

Critical Ending Questions:

How do you get the EU to uphold the norms of trade, security and geopolitics? How do you get the EU to impress upon and persuade to uphold norms and treaty obligations that India is a signatory to? How do you get the EU to strengthen the civil society ecosystem and coalitions in the form of research, advocacy etc.? Given the EU's leadership in terms of privacy, can it engage India regarding that? There is also scope for the EU to facilitate philanthropic dialogue to generate philanthropic knowledge in India.



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