



# 2021 CIVIL SOCIETY ORGANIZATION SUSTAINABILITY INDEX

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For Estonia  
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## LOCAL PARTNER

NETWORK OF ESTONIAN NON-PROFIT ORGANIZATIONS (NENO)

Kai Klandorf

## PROJECT MANAGERS

FHI 360

Michael Kott  
Eka Imerlishvili  
Alex Nejadian

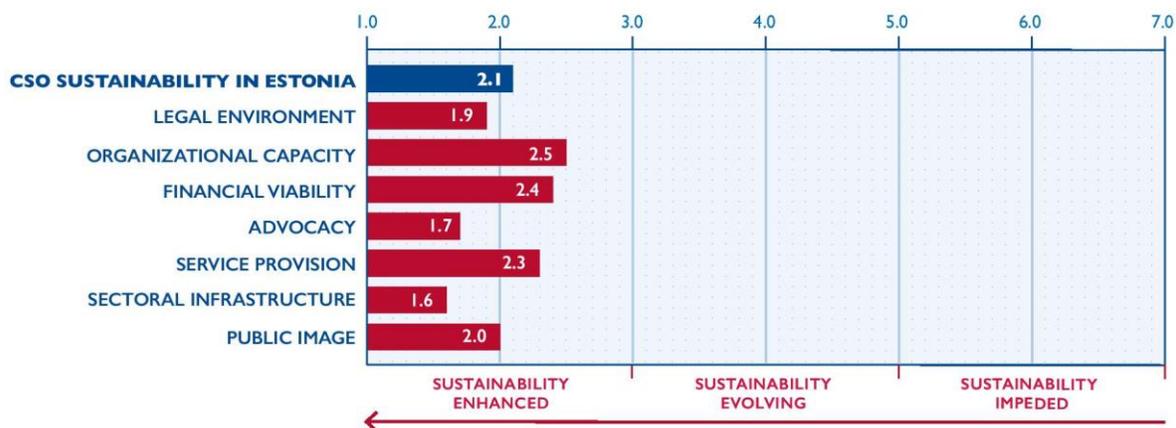
INTERNATIONAL CENTER FOR NOT-FOR-PROFIT LAW (ICNL)

Catherine Shea  
Jennifer Stuart

## EDITORIAL COMMITTEE

Erin McCarthy, Michael Kott, Jennifer Stuart, and Tamás Scsaurszki

## OVERALL CSO SUSTAINABILITY: 2.1



2021 was another turbulent year in Estonia. The year began with a change of government as the pandemic continued. The previous government consisted of three parties—the Centre Party (the largest political party in Estonia), the right-wing party Isamaa, and the far-right Conservative People's Party of Estonia. The three-party coalition collapsed in mid-January because of allegations of corruption. A new government was formed by the Reform Party, which initially won the 2019 elections but was unable to form a governing coalition, and the Centre Party. Kaja Kallas assumed the role of prime minister, becoming the first female government leader in Estonia. When the new government came to power, it canceled a referendum the previous government planned to hold in April on the topic of marriage equality for same-sex couples.

Unfortunately, the change of government did not reduce polarization in the country. Tõnis Saarts, one of Estonia's leading political scientists, concluded the year on ERR, the national broadcasting company, by stating “the anxiety-inducing trend of deepening polarization cannot be overlooked, whether we are talking about the marriage referendum at the start of the year, anti-vaccination sentiment from this fall, or the recent rhetoric against the shift to a greener ecosystem.

Under the previous government, the development of civil society was the responsibility of the Minister of Population Affairs. With the change of government, responsibilities were shuffled again, and civil society once again came under the purview of the Minister of the Interior. This is likely to mean that civil society receives less attention from the minister, although for some organizations—particularly those focused on minorities, human rights, and gender equality—this might be a good thing.

Local government elections took place in October. Turnout for the local elections was 54.7 percent, an increase compared to 2017. The Centre Party and local electoral alliances won the most votes in the elections. In many local communities, local civil society activists ran as candidates under electoral alliances.

The COVID-19 pandemic continued to take a toll on the population in 2021. Although less strict than in 2020, restrictions continued to be in place to control the spread of the virus. For instance, there were limits on the number of people that were allowed to gather for both indoor and outdoor events and the times that bars and similar businesses were allowed to be open. In addition, a COVID certificate providing proof of vaccination, having had COVID-19, or a negative COVID test started to be required to enter bars, restaurants, and other public venues; this was later modified to just require proof of vaccination. The vaccination campaign began at the beginning of the year, and over 60 percent of the population was fully vaccinated by the end of 2021. However, some segments of the population were reluctant to vaccinate and organized some small-scale protests to express their opposition.

Overall CSO sustainability did not change in 2021. The only dimension in which a change in score was reported was advocacy, which improved slightly as CSOs' role in policy-making processes was further institutionalized

during the year. Civil society has proven to be capable and trustworthy, helping both the state and those in need by organizing campaigns, collecting donations, and volunteering. As Anneli Roosalu, the director of the National Foundation of Civil Society (NFCS), wrote in Postimees in May, Estonia would not survive the COVID-19 crisis without the civil society sector.

According to the Estonian e-business registry, in 2021 there were a total of 23,598 associations and 824 foundations registered in the country. Although there are sustainable organizations all over the country, the greatest number are located in Tallinn and Harjumaa. The most popular area of work for CSOs is recreational activities.

## LEGAL ENVIRONMENT: 1.9



The legal environment governing the CSO sector did not change significantly in 2021 and remains quite supportive.

The CIVICUS Monitor continues to rate Estonian civic space as open, while Estonia is rated as Free in Freedom in the World, Freedom House's annual study of political rights and civil liberties worldwide. According to the Freedom in the World country report on Estonia, "Estonia's democratic institutions are generally strong, and both political rights and civil liberties are widely respected."

CSOs can register as either associations or foundations. Associations can register through a very easy process that can be completed online in just a few minutes. Registration of an association requires just two people. Registering a foundation is more complicated and

requires a notarized registration application, memorandum of association, articles of association, and other documents. Foundations cannot register online.

All state fees will increase beginning in 2022, which will affect CSOs. For example, registering changes in the commercial register will cost EUR 10 instead of EUR 7, while initial registration costs will increase slightly to EUR 30 for associations, EUR 80 for foundations, and EUR 10 for religious associations.

The legislation concerning the activities of associations has undergone a substantive and systematic analysis over the past few years. As a result of this process, a new Law on Assembly (which covers both associations and foundations) was developed that harmonizes and updates the regulations governing registration of all legal entities. Only a few changes affect CSOs. For example, applicants can now apply for registration on a specific date up to six months in the future, but only in the case of mergers or similar reorganizations. In addition, the registrar can indicate if it has difficulties in contacting the legal entity and disclose information on fines. Both of these measures will provide information on the reliability of an organization for prospective donors and partners.

Parliament passed an amendment to the Gambling Tax Act in 2021 that implements a long-standing plan to decouple expenses from receipts. The level of funding from the gambling tax to be disbursed by the Ministry of Social Affairs to CSOs will initially remain at this year's level but will no longer increase or decrease with changes in tax revenues. In addition, this amendment removes mention of the specific areas that can be funded, an issue that has been controversial in the past.

CSOs and their representatives may operate freely, openly express criticism, and address all matters of public debate. CSOs are generally free from harassment by the central government, local governments, and the tax agency. No incidents of government harassment of CSOs were reported in 2021.

CSOs may earn income by charging fees for goods and services, establishing social enterprises, engaging in fundraising campaigns, and accepting funds from foreign donors. CSOs are allowed to compete for government contracts and procurements at the central and local levels.

CSOs that engage in charitable work may apply for status as public benefit associations and foundations, which makes them eligible for income tax breaks. Political parties, professional organizations, and business associations are not eligible for this status. Individuals may deduct donations to public benefit organizations of up to EUR 1,200, and legal entities may make tax-free donations to public benefit organizations of up to 10 percent of the previous year's profit or up to 3 percent of personnel costs during the current year.

Very few lawyers are trained in or familiar with CSO-related laws, but in most cases in which CSOs utilize the services of lawyers, such as appealing funding decisions in court, expertise in CSO law is not necessary. Lawyers sometimes work with CSOs pro bono or at reduced costs.

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## ORGANIZATIONAL CAPACITY: 2.5

Organizational capacity within the CSO sector in Estonia did not change in 2021 and remains fairly high. CSOs have access to several capacity-building opportunities from umbrella organizations like the Network of Estonian Nonprofit Organizations (NENO), professional advocacy organizations like Mondo, NFCS, and the government.

The COVID-19 pandemic and the related restrictions continued to impact CSOs in 2021. After postponing their activities in 2020, several service providers and social enterprises had to permanently terminate their work in 2021 because of the continuation of restrictions. For example, several children's daycare organizations had to close because parents chose to keep their children at home to avoid contact.

The capacity gap in the sector widened as a result of the pandemic: while stronger organizations were able to adapt and continued to grow, smaller ones were often left behind. For example, the experts evaluating project applications for NFCS reported that the quality of applications from smaller CSOs has decreased, with projects tending to be less thought through and strategic.

In light of the continuing pandemic and constantly changing restrictions, organizations had to be very flexible and able to quickly cancel or postpone activities, come up with solutions to problems, and find new ways to operate. Organizing large events was particularly challenging because it was unclear what the situation would be several months in the future. The requirement to have a COVID certificate also caused tension, with some organizations deciding not to hold in-person events because they did not want to restrict their audience to vaccinated people. For example, the Estonian Cooperation Assembly in cooperation with local community organizations canceled their traveling exhibition in some locations to avoid asking their target groups for COVID certificates.

Most CSOs clearly identify their potential constituents and beneficiaries and actively seek to develop relationships with them. CSOs often involve their constituencies in their activities or otherwise ensure that their activities represent constituents' needs and interests. However, some organizations continued to face challenges reaching their target groups in 2021 as they are used to having a more hands-on approach or their target groups are harder to reach online, as is the case with the elderly and rural communities. At the same time, many organizations report that the number of people attending their events increased. For example, the Estonian Village Movement Kodukant organized a hybrid conference that it anticipated would be attended by 100 people online, but more than 300 ended up attending. Such changes can only be accommodated with online events. At the same time, the Finno-Ugric Capital of Culture struggled to attract an audience for an in-person event in June.

In order to register, every CSO must have a defined objective; most CSOs also have mission statements. According to the National Civil Society Strategy Impact Evaluation, which is carried out every five years, in 2019, about 20 percent of CSOs had written strategy documents. Smaller CSOs often lack the capacity to incorporate strategic planning techniques into their decision-making processes.



Larger CSOs generally have clearly defined management structures, including an explicit division of responsibilities between the board of directors and staff, as stipulated in the law. All CSOs must specify policies and procedures in their bylaws when they are formed. CSOs' bylaws often define additional rules, such as the number of people on management boards.

According to the 2019 National Civil Society Strategy Impact Evaluation, approximately 23 percent of CSOs employed permanent staff. Organizations that depend on volunteers and interns have struggled to continue functioning because the pandemic has restricted people's movement and many people avoid unnecessary contacts. According to the Charities Aid Foundation's *World Giving Index 2021*, which reports data from 2020, 18 percent of respondents in Estonia reported volunteering.

CSOs are generally able to afford modern information and communication technology (ICT) and internet access. Most CSOs were able to make the appropriate investments and adopt new ICT tools to adapt to the COVID-19 restrictions.

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## FINANCIAL VIABILITY: 2.4



The CSO sector's financial viability remained unchanged in 2021. Although support from the government is growing and donations increased, these positives were balanced out by rising inflation during the year. According to Statistics Estonia, salaries increased by 6.9 percent, the housing price index increased by 15.1 percent, and the consumer price index rose by 4.6 percent. Many CSOs had to reduce their staff or activities given the increased costs.

The amount of funds provided to CSOs from national and local government sources has increased over the past several years. In 2018, the national government provided CSOs with EUR 166 million and local governments provided over EUR 64 million. By 2020, these figures had increased to EUR 200 million and EUR

68 million, respectively. However, only 21 percent of CSOs benefit from this funding. Funding from local governments, which 35 percent of CSOs benefit from, decreased slightly from 2019 to 2020 because of local governments' financial situation. Despite this, the overall amount was still higher than it was in 2018. Data on 2021 funding was not yet available at the time of writing this report.

Advancing strategic partnerships between ministries and CSOs, including through longer-term contracts and more sustainable cooperation, is an advocacy aim of NENO and other umbrella organizations. In 2021, NENO published a [guidebook](#) for public officials and CSOs on how to improve cooperation. The Ministry of Education and Ministry of Social Affairs both continue to improve their design of and conditions for strategic partnerships. While the overall direction of change is positive, there are still some problems with the conditions of such partnerships. For example, CSOs express concern about the time it takes to evaluate applications and negotiate and sign contracts. Another challenge is advancing understanding of these principles in other ministries.

NFCS is a state-financed civil society fund and a critical source of financial support for Estonian CSOs. However, NFCS' budget has remained largely unchanged for the past decade. NFCS distributed most of its funding in 2021 through capacity development grants, while it also issued a few smaller calls for proposals for organizing large events and visiting international events.

According to the [report](#) "Analysis of local government funding for local CSOs: Post - administrative reform financing practices in local governments," which was published by NFCS and carried out by the University of Tallinn in 2021, all local governments involved in the analysis provide financial support to CSOs. The report concludes that compared to 2015, the amount of support allocated by local governments to CSOs has increased by 68 percent. In addition, since 2016, the financing of associations by local governments has become more

structured and transparent. While in 2016, almost one-third of local governments lacked procedures for financing associations, in 2020 all seventy-eight local governments included in the analysis had such procedures.

At the same time, several local municipalities canceled funding calls in 2021 because of financial difficulties created by the pandemic. For example, the municipality of Tartu canceled a funding call for CSOs in the area of culture in 2021 because of a lack of funds.

Estonian CSOs have access to several foreign funding opportunities. The largest amounts of foreign funding come through EU calls for grants, including the European Commission's Citizens, Equality, Rights and Values program. The Active Citizens Fund (ACF), supported by the European Economic Area (EEA) and Norway and implemented by the Open Estonia Foundation, is the largest Estonia-based foreign funded grant program. Between 2019 and 2024, ACF will make a total of EUR 6 million available to Estonian CSOs through public project competitions and other measures. In 2021, the Open Estonia Foundation launched an open call for institutional grants under ACF, through which it awarded approximately EUR 500,000. The aim of the call was to support medium-sized advocacy and watchdog organizations in achieving their strategic objectives, while also focusing on capacity building and sustainability. In 2022, ACF will launch its last funding calls and then will be terminated. ACF has been an important source of funding for CSOs in Estonia, particularly those that do not get funding from the state, including Transparency International Estonia and several environment organizations. However, ACF's grants are relatively small, the grant periods are short, and competition for the funds is quite high. CSOs can also apply for grants under several smaller programs based in Estonia, including that offered by the Nordic Council of Ministers' Office in Estonia.

In 2020, according to the Estonian Tax and Customs Board, CSOs collected a record EUR 48.7 million in donations. This includes EUR 19.7 in donations from individuals and EUR 11.6 million from companies; the rest (EUR 17.4 million) was in the form of anonymous donations. Both individual and corporate donations have increased steadily over the past few years. NENO and the [network of organizations collecting donations](#) contributed to this success, in part by organizing the donation campaign [Annetamistalgud](#) (part of the Giving Tuesday movement), which took place for the third time in 2021. Through this campaign, 128 initiatives collected EUR 189,202, a new high.

CSOs increasingly raise funds through crowdfunding. Over the past ten years, more than 165,126 individuals have contributed approximately EUR 5,695,118 to 1,585 projects through the local crowdfunding portal Hooandja.

According to the 2019 National Civil Society Strategy Impact Evaluation, 57 percent of associations earned income by charging fees for goods or services.

In general, CSOs have sound financial management systems. Audits are not obligatory, although some larger funders require project audits, and some organizations voluntarily conduct audits to demonstrate their transparency. The majority of organizations state they do not need additional financial management training. Donors like ACF and the Good Deed Foundation, however, note the need to further develop some financial management skills, including the ability to account for funding from different projects through a single management system that takes different donors' requirements into account.

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## ADVOCACY: 1.7

CSO advocacy improved slightly in 2021 as the government adopted several plans and policies that further institutionalize CSOs' role in policy making. CSOs continue to prove themselves to be trustworthy and professional partners for the government and strategic advocates of their stakeholders' interests.

Cooperation between the government and CSOs continues to follow the principles outlined in the Estonian Civil Society Development Concept (EKAK), which is coordinated by a twenty-two-member committee composed of government and CSO representatives. With the change in government, the committee was again chaired by the minister of interior in 2021. Some committee members have expressed concern that the committee, which only meets once a year, does not meaningfully advance cooperation between CSOs and the government and therefore needs to be revised.

The change of government had a positive impact on some CSO advocacy initiatives. For example, the parliament approved an amendment to the Psychiatric Care Act proposed by the Social Democrats, which allows people

under the age of eighteen to seek the services of a psychiatrist without requiring consent from their parents. The Psychiatric Care Act, which was blocked by the far-right conservative party in the previous government, can be considered an advocacy win for the coalition of mental health organizations.

In 2021, the government approved good practices for dealing with lobbyists, which also apply to CSOs and advocacy experts. This is considered an important step forward in promoting transparency in decision making. For example, the guidelines newly require high-ranking public officials to disclose lobbying meetings. However, the practices are not as comprehensive as they could be, and members of parliament, for instance, do not have to disclose such meetings.

In early 2022, Transparency International Estonia analyzed the initial data on lobbying meetings disclosed by high-ranking public officials, as required by the new guidelines. The analysis reveals that only 18.4 percent of the meetings disclosed in 2021 involved CSO representatives compared to 60 percent with people representing business interests.

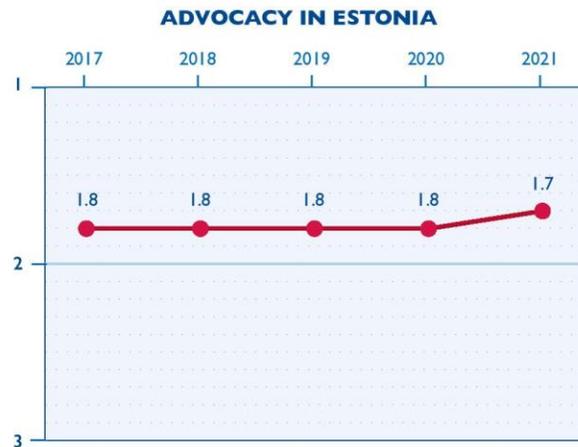
In 2021, the government developed the Coherent Estonian Development Plan 2021-2030, which includes a program for civil society called Community-based Estonia 2022–2025. The program was developed in cooperation with civil society actors who then were tasked with leading some parts of the program. Program activities focus on supporting the development of civil society in order to promote an informed and active population, able and caring communities, capable and sustainable CSOs and social enterprises, and transparent and inclusive policy making. Under this strategy, responsibility for advancing civil society’s inclusion in decision-making processes will be carried out by two public officials working in the Ministry of Interior and not NENO or any other CSO, as was previously the case.

The Citizen Initiative Portal continues to enable citizens to write proposals, hold discussions, and send digitally-signed electronic petitions to the parliament. The parliament must consider any proposal that receives at least 1,000 signatures from citizens over the age of sixteen. Since 2014, a total of 258 initiatives have collected 334,358 signatures and 133 initiatives have been submitted to parliament. In 2021, the most popular initiatives were related to the marriage equality referendum the previous government wanted to organize.

The overarching vision of Estonian development cooperation is to ensure peace and stability, contribute to the eradication of poverty, and help attain the Sustainable Development Goals by sharing Estonia’s reform experience with other countries undergoing transition. In 2021, the Estonian Center for International Development (EstDev) was created under the Ministry of Interior. The creation of this new entity complicates policy making, funding, and the implementation of projects in this field, which now involves the Ministry of Foreign Affairs, EstDev, and CSOs. While there is optimism that positive forms of cooperation will be developed, larger CSOs in the development field note that the process of developing this new organization was not very inclusive or transparent and that developing effective cooperation between parties is inherently challenging.

During the period leading up to the local elections in October, several organizations worked with electoral alliances and parties on the local level to advance their advocacy goals. Several organizations also advocated for more content-focused debate and campaigning. For example, the think tank Praxis and youth organization Estonian Debating Society put together a campaign to advise the public on how to avoid political manipulation, while SALK worked to promote transparency in campaign expenses and to attract youth voters. Other organizations like Transparency International Estonia, LGBT Association, and the Estonian Fund for Nature also advocated for their causes during the election period. For example, the animal rights organization Loomus developed an election compass for people to identify animal-friendly politicians. Several of these campaigns and projects were funded by ACF.

As the legal environment governing CSOs in Estonia is already quite enabling, CSOs do not spend much time advocating for improvements in the system. As mentioned above, the Law of Assembly is undergoing revisions; CSOs have been involved in this process. In addition, several CSOs were involved in the process of amending the



Local Self-Government Organization Act, which was approved by the government in 2021. One amendment to the act allows at least 1 percent of village and city residents to present public initiatives. In addition, a local referendum can be initiated with the support of at least 10 percent of the residents of the respective municipality. The new act is planned to take effect in 2023.

## SERVICE PROVISION: 2.3



Service provision by CSOs did not change significantly in 2021. While it was difficult to provide some types of services during the pandemic, CSOs adapted by creating new services and sources of income. In most cases, the goods and services that CSOs provide continue to reflect the needs and priorities of their communities.

CSOs provide a wide range of goods and services in a variety of fields, including basic social services, such as health, education, and welfare, as well as youth employment. Many CSOs offer extracurricular activities like sports, choir, folk dancing, and other cultural activities. All of these services were affected by the pandemic and the related restrictions. The number of clients fell drastically as sports clubs and other organizations were required to check vaccinations. At

the same time, service-providing CSOs had to continue paying fees, salaries, and utility expenses, which was difficult for many, especially given rising inflation rates during the year.

Organizations offering catering services also struggled as many meetings and events continued to be held online during the year. For example, a social enterprise called Siin&Sääl (Here & There) traditionally provides catering and a café and organizes workshops on topics like African dancing, Sri Lankan food, or Syrian handicrafts. Siin&Sääl is run by refugees living in the country and people with a migration background, in conjunction with the Estonian Refugee Council. While it was able to create and open an e-shop in 2021, the organization struggled to continue operating.

Some communities that are traditionally dependent on foreign tourists also had to quickly adapt and focus on local people and regional tourists. For example, local CSOs in Setomaa developed offerings to attract more local tourists. At the same time, Domus Dorpatensis in Tartu, which operated a guest house before the pandemic, reorganized and now offers apartments for long-term rent. This reorientation, however, meant that it had to let go of the majority of its staff as long-term renting means less work on a daily basis.

Domestic violence has always been an area of concern in Estonia. Between 2011 and 2019, the number of domestic violence crimes increased gradually, but the growth came to a halt over the last two years. In 2021, 3,760 domestic violence crimes were registered, 6 percent less than in 2020. At the same time, the number of women turning to shelters (which are run by CSOs) has increased as awareness and willingness to ask for help grows. Funding for these shelters, however, has not increased and quite often they need to collect donations and find other sources of revenue to operate with high quality.

The government at both the national and local levels recognizes the value of CSOs' services through its public statements, policies, and practices. Local municipalities, ministries, and other public bodies outsource services from CSOs and also delegate service provision to CSOs.

## SECTORAL INFRASTRUCTURE: 1.6

The infrastructure supporting CSOs in Estonia continues to be well established, with no significant changes in 2021.

Umbrella organizations, networks, and regional development centers all continue to be important sources of support for CSOs, offering information, training, technical assistance, advice, and opportunities to cooperate.

People interested in establishing a CSO or other form of civic activism can turn to the portal [mtyabi.ee](http://mtyabi.ee) for advice, tools, and funding information. Local organizations can get training, information, and other types of support from the County Development Centers located in every county. Since the onset of the pandemic, there has been an increase in the number of participants in the online events organized by the County Development Centers.

NFCS provides support to CSOs so they can pursue their objectives consciously and purposefully. The Good Deed Foundation continues to manage two funds—the Impact Fund and the Education Fund—which collect resources from Estonian entrepreneurs. The Võimalus Fund supports the implementation of cultural, sports, youth, and other nonprofit projects on Saaremaa, an island in the west of Estonia.

Several umbrella organizations advance cooperation and impact in their areas of work. For example, NENO coordinates several networks, including the network of organizations collecting donations (156 members), organizations focusing on advocacy work (36 members), organizations focused on involving volunteers (50 members), and organizations promoting open government (30 members). The Estonian Chamber of Environmental Associations is a coalition that coordinates the more than fifty organizations engaged in climate work in the country. The Estonian Human Rights Center coordinates the network for equal treatment.

While co-creation and cooperation are often-used buzzwords, true cooperation continues to be challenging, as polarization and rivalry are still widespread in the civil society sector. Conflicts among and between organizations even sometimes reach the media. For example, media covered the Estonian Association of Families with Many Children’s decision to terminate the membership of the Tallinn and Harju County Association of Large Families after a public dispute.

Developing leadership capacity continues to be a need among CSOs. Through ACF, NENO implements a development program for future civil society leaders. In 2021, the first group of thirteen people successfully graduated the year-long program; the second cohort of the program started in November. NENO also coordinates two groups in which current executives can share information related to leadership. County Development Centers provide trainings and workshops for leaders of local level organizations. According to donors including ACF and NCSF, CSOs also ask for training and support on topics like communication and networking.

According to the 2019 National Civil Society Strategy Impact Evaluation, 69 percent of CSOs have permanent partnerships. CSOs most frequently cooperate with local governments (40 percent of CSOs report such cooperation) and with other associations (reported by 39 percent of CSOs). Sixteen percent of organizations have partnerships with businesses.

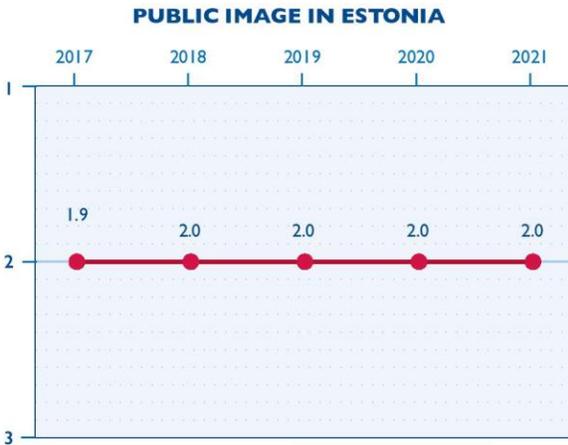
**SECTORAL INFRASTRUCTURE IN ESTONIA**



## **PUBLIC IMAGE: 2.0**

CSOs’ public image was stable in 2021. CSOs engaged in advocacy and service provision continue to benefit from media coverage in local and national, public and private, and traditional and online media. CSOs also continue to use social media to reach their audiences and raise awareness.

During the COVID-19 pandemic, mental health organizations found it fairly easy to get media coverage. The organization Peasi and VATEK (the coalition of mental health organizations) worked with other partners, the Ministry of Social Affairs, and media on their successful advocacy campaign that resulted in the government’s approval of the Green Paper on Mental Health, which makes proposals to improve the prevention and early detection of mental health problems and the timely provision of high-quality mental health services throughout Estonia.



In general, cooperation between media and CSOs is improving as trust between them grows. For example, NENO has advocated to end the [protection money allocation system \(sometimes also referred to as “pork barrel funding”\)](#) for years now. Through this system, politicians distribute about EUR 6 million a year without regard to the state development plans. Media outlets are increasingly interested in the topic, so NENO no longer has to actively seek coverage for the topic.

A growing number of associations have become well-known in the eyes of the public. Organizations that increased their public visibility during 2021 include the teachers’ substitute program ASÕP, mental health service provider Peaasi, and the cross-sectoral cooperation platform Rohetiiger, which aims to create a

balanced economic model for Estonia and the world. Organizations that collect the largest sums of donations are also widely known. For example, the Gift of Life is a privately-initiated cancer treatment support foundation whose mission is to help cancer patients. In 2021, the foundation collected EUR 3.26 million in donations.

In general, both the business sector and government officials (local and national) have a positive perception of CSOs—both those providing services and engaging in advocacy. In some fields, however, even well-established and professional organizations are not well perceived by other stakeholders. For example, environmental organizations find it challenging to cooperate with ministries and businesses in the area of forestry.

CSOs regularly strive to publicize their activities and promote their public image. Some organizations see the media as a partner and have developed successful relationships with journalists or effectively approach the media in a professional manner. Others engage media representatives on their boards. For example, the news manager of the Estonian National Broadcasting company is a board member of Opinion Festival. Many other organizations like the Bullying-free School Foundation and NENO have communication experts as board members.

CSOs are fairly transparent. A code of ethics for CSOs has existed since 2002. CSOs can also sign onto several good practices and codes of conduct. For example, the Good Practice of Fundraising is a self-regulatory tool for improving transparency in fundraising; by the end of 2021, 156 organizations had subscribed to this tool. CSOs often make annual reports on funding available on their websites. Such reports can also be requested from the business registry for a small fee.

**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.

**U.S. Agency for International Development**

1300 Pennsylvania Avenue, NW

Washington, DC 20523

Tel: (202) 712-0000

Fax: (202) 216-3524

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