



Stronger Charities.
Stronger Communities.

THE WHEEL'S FEEDBACK ON THE EU CIVIL SOCIETY STRATEGY

September 2025

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About Civil Society in Ireland

Civil society organisations in Ireland (often called the community, voluntary, charity, and social enterprise sector) are involved in every community in the country, providing health and social supports, services, and advocacy on behalf of people with disabilities, older people, young people, children, people experiencing poverty and disadvantage, and people at every stage of their lives.

In addition to its societal contribution, civil society makes a major contribution to the economy. It comprises approximately 35,000 organisations, involves almost 76,500 volunteer trustees, directly employs 281,250 people in charities alone (1 in every 8 employed people), and manages income of €25 billion per year. These organisations raise almost half of this income themselves, majorly subsidising the cost of public services in Ireland. When direct, indirect, and induced impact is considered, the sector had €32.1 billion in expenditure in 2022, and supported 321,000 jobs.

The breadth of civil society in Ireland is far reaching. Organisations provide vital services and supports in areas such as health and social care, community development, children and family services, and integration. They are at the forefront of the work to address the climate crisis and to advocate for human rights. The sector is integral to meeting the most important societal challenges and providing essential public services. For example, nearly 70% of all disability services are provided by voluntary organisations funded under Section 38 or Section 39 of the Health Act 2004.

About The Wheel

The Wheel is Ireland's national association of charities, community groups and social enterprises. Our membership includes thousands of nonprofit organisations of all types and sizes, including most of Ireland's leading charities.

As a representative voice, we provide leadership to the charity and community sector and we advocate on behalf of our growing community of members.

As a supportive resource, we offer advice, training and other opportunities to people working or volunteering in the charity and community sector.

Summary

The feedback in this document comprises further detail and recommendations on the EU Civil Society Strategy. It is structured as a series of responses to the open questions in the online consultation.

Feedback on the EU Civil Society Strategy

In your view, what role do civil society organisations play in your Member State?

Civil society organisations are a vital pillar of Irish society, making a profound contribution to our economy and our communities.

They operate as providers of essential public services and supports, working at the coalface in areas such as health, social care, disability services, lifelong education, community development and many more. They provide services and support to the most vulnerable groups. For example, one in twelve charities in Ireland is specifically dedicated to the relief of poverty or economic hardship, while 70% of disability services are provided by civil society sector. The State is heavily reliant on these organisations to provide core services.

Civil society organisations are also a cornerstone of democracy and social cohesion. They represent diverse communities, inform policymakers on the impact of policies (or lack of thereof) on the population and the environment, defend fundamental rights, and hold institutions accountable. They also play a vital role in advocating for marginalised groups and pushing for social change. The impact of civil society organisations can be seen in recent referendums in Ireland on marriage equality and access to abortion.

When the rule of law and democracy are under attack from internal and external threats, they act as watchdogs, promoting transparency and good governance, while also enabling people to participate in decision-making at local, national, and EU level. These organisations are indispensable to a healthy democratic ecosystem and must be recognised as such by public authorities.

According to a report by the Charities Regulator, the community and voluntary sector comprises approximately 35,000 organisations; nearly 76,500 dedicated volunteer trustees; and a workforce of 281,250 people employed in charities alone—that's one in every eight employed individuals. The sector manages €25 billion in annual income, generating nearly half of this through fundraising, thereby significantly subsidising the cost of essential public services. When we consider the broader economic impact, including direct, indirect, and induced effects, the sector's expenditure reached €32 billion in 2022, supporting 321,000 jobs.

Civil society has repeatedly stepped up during crises, filling infrastructural gaps when the country needed it most: Covid 19, the impact of the invasion of Ukraine and more recently major storms. The sustainability of the sector is crucial in addressing future crises.

Similarly, social economy entities – such as cooperatives, mutuals, associations, and social enterprises – play a vital role in addressing societal challenges, creating quality jobs, and fostering sustainable and inclusive economic models.

Please indicate your perception of the challenges and risks faced by civil society organisations in the European Union.

CSOs are essential to the EU's democratic fabric. They ensure that laws and policies respect fundamental rights, give voice to marginalised communities, and provide a channel for civic

participation beyond elections. Protecting CSOs is protecting democracy itself: without them, there is no independent scrutiny, no effective defense of rights, and no inclusive policymaking. In a time of growing authoritarian trends, safeguarding civic space is not optional. It is a legal and moral obligation under EU treaties and the Charter of Fundamental Rights.

Limited or inflexible funding, funding cuts

Ireland has remained comparatively insulated from some of the threats to civil society detailed above, the impact on funding cuts after the 2008 financial crisis cannot be overstated. Community development organisations, in particular, received significant funding cuts during this time, which have never been reversed, and those organisations, who serve the most vulnerable communities in Ireland, continue to struggle. In The Wheel's recent member survey, almost half of respondents were unsure if they would have sufficient funding to provide their existing supports or services in 2025.

This is also having a serious impact on civil society's ability to recruit and retain staff. A 2023 report found that staff in the community and voluntary sector were not legally entitled to the same pay as public sector employees delivering often identical services, meaning that in some cases pay increases of up to 15% are required to tackle this negative disparity. More than one third of organisation who responded to our survey said they were unable to sufficiently recruit and retain staff. While some progress on this has been made, the State's approach has been slow and piecemeal.

The sector in Ireland provides a significant percentage of essential public services. While this results in more community-led, person-centred and flexible services that reflect need, it can mean that organisations are reluctant to critique government policy, fearing a loss of funding. Whether this risk is real or just perceived, it is damaging to a healthy civil society.

Additionally, the lack of multi-annual funding in Ireland makes it difficult for organisations to operate, plan and respond to long term challenges. Most of them operate on annual funding, which exacerbates uncertainty and staffing challenges.

There is very little dedicated funding for civil society. With organisations completely tied up with service delivery, forced to compete and undercut each other with funding contracts, there's not much room or support for advocacy work, or to maintain a healthy civic space that encourages dialogue and innovation. Guidance and mandates from the EU to its member states on how to support civil society outside of service delivery would be welcome and would facilitate better measurement of countries' performance.

Administrative barriers

Funding contracts with the State are often highly restrictive and must be renewed annually, meaning that organisations cannot plan for the future development of essential programmes and projects. Compliance and reporting requirements are often onerous, and repetitive, especially for organisations who are funded by multiple departments or agencies. Multi-annual funding, greater coordination and cross-government working in needed.

Verbal threats and attacks against civil society organisations offline and online

Anti-NGO sentiment has grown significantly in Ireland in recent months, fuelled by a growing far right and the spread of online misinformation. While direct attacks on civil society organisations remain relatively low when compared to some other European countries, verbal threats and online harassment have increased significantly. This is happening alongside a documented increase in hate crimes more broadly over the last few years.

We believe it is important that both the Irish State and the EU work to directly address the rising number of threats faced by people working in civil society organisations who speak up on important social issues. Civic space is increasingly under pressure and it is essential that we protect it and invest in its overall resilience.

We recommend increasing investment the EU's Citizenship, Equality, Rights and Values Programme to ensure responsiveness to current civil society challenges. It is essential that the EU takes a proactive approach, preventing decline where possible, rather than reacting once crises occur. This will require ongoing investment into civil society monitoring, capacity building and protection. The CERV programme has proved effective, but much more investment is needed considering the serious and unprecedented threats facing the sector.

Why do you think it is important to protect civil society organisations?

CSOs are essential to the EU's democratic fabric. They ensure that laws and policies respect fundamental rights, give voice to marginalised communities, and provide a channel for civic participation beyond elections. They also help bridge the gap between citizens and EU institutions, bringing a European dimension to local struggles and linking grassroots realities to EU decision-making. Protecting CSOs is therefore protecting democracy in Europe as a whole. Protecting CSOs is protecting democracy itself. In a time of growing authoritarian trends, safeguarding civic space is a legal and moral obligation under EU treaties and the Charter of Fundamental Rights.

States have a duty to safeguard civil society and human rights defenders from physical harm by external parties. At the same time, they have to uphold the right to life, physical integrity and freedom from ill-treatment for everyone in their jurisdiction as well as safeguarding their right to association, peaceful assembly and expression, without any undue interference. Authorities at both national and EU level are obliged to proactively prevent violations, respond to early warning signs, and promptly carry out impartial investigations when attacks occur.

Without a safe space, genuine and meaningful democratic participation is not possible, and the EU's credibility as a global promoter of democracy and human rights is undermined.

Please briefly describe how the situation has worsened/improved.

Across the EU, civic space has significantly deteriorated over the past five years. Restrictive laws, political attacks, disinformation, and harassment of activists have become more frequent. The COVID-19 pandemic and other crises have been used to justify disproportionate restrictions. Structural funding has decreased in real terms, and administrative burdens have grown. While

some EU-level initiatives have raised awareness, the overall operating environment for CSOs is more hostile, threatening their independence and capacity to fulfil their democratic role.

The situation for advocacy organisations in Ireland has also worsened, fuelled by online misinformation and the rise of the far right. At national level, little is being done to address this, or to pressure social media companies to regulate harmful content. Ireland's unique relationships with the US and the UK, where there have been disturbing developments around democratic protections, exacerbates this ongoing risk to civil society. It is vital that the EU act now to prevent further disintegration of civil society and open civic space across Europe.

Operating challenges for civil society organisations in Ireland have increased in the last five years. Significant increases in the cost of living, combined with the housing and rising insurance costs have made it increasingly difficult for organisations to provide services and supports. There is urgent need for sustainable funding models for civil society organisations, funded on a full-cost-recovery, multiannual basis.

Are you aware of existing rules or structure in your country (EU Member State(s)) concerning how public authorities engage with civil society organisations, in particular to allow them to meaningfully participate in the decision-making process? If so, please provide examples, in particular of any relevant best practices.

Engagement between public authorities and civil society in Ireland varies widely in terms of effectiveness. Several mechanisms exist for this purpose, including public consultations, the Public Participation Networks, the Community and Voluntary, and Environmental, Pillars, pre-Budget forums and the National Economic Dialogue. While engagement mechanisms are numerous, it is often difficult for civil society to effect real change, and many of these consultations feel tokenistic or rushed. Participation does not equate to influence, and marginalised groups in particular, often find it hard to influence the policymaking process that affects their own communities.

The quality of engagement also varies significantly between government departments and agencies, and indeed between regional areas. There is little joined-up thinking or rollout of best practice within Government.

Best practice

Some positive steps have included the development of the Values and Principles for Collaboration and Partnership by the Department of Rural and Community Development, which provides a blueprint for meaningful engagement with the sector. A similar document was also produced by the Department of Health as a result of the Health Dialogue Forum process. Similarly, the Civic Forum showcases collaboration between State and civil society. Some strategies have been co-drafted and designed by State and Civil Society and their implementation is jointly reviewed as part of a national implementation subgroup. This is the case for the National Strategy on Housing for Disabled People.

Limitations

However, the outcomes of these processes have not been implemented broadly. The centralised nature of policymaking in Ireland places a disproportionate amount of power in the Department of Finance and the Department of Expenditure and Reform, resulting in constant deferral of responsibility by other departments.

Similarly, major engagements such as the Citizens' Assemblies and the Open Government Partnership have proved both popular and valuable, but little has been done to further develop these kind of democratic engagements or to demonstrate meaningful implementation of their findings and outcomes.

Are you aware of existing measures at EU level to engage with civil society organisations, in particular to allow them to meaningfully participate in the decision-making process? If so, please provide examples, in particular of any relevant best practices.

There is the absence of a systematic approach, clear framework or adequate resources and investments at EU level for engagement with CSOs. Structured civil dialogue remains largely insufficient across EU countries, with many member states failing to establish regular, meaningful engagement channels. As a result, civil society voices are often excluded from key decision-making processes, particularly in politically sensitive areas such as social rights, migration, gender equality, and environmental justice.

As members of EU Civic Forum and Social Economy Europe, The Wheel has co-authored several submissions on EU policy. We are signed up to public consultations via the Transparency Register but, like many organisations, rarely have capacity to respond to all of the calls.

What further measures could be considered by the EU to engage with civil society organisations to ensure they can meaningfully participate in the decision-making process at EU level?

In an increasingly challenging environment for civil society across Europe, it is vital that the EU works to protect the fundamental rights of civil society organisations (CSOs) to

- be adequately funded in their advocacy and service-provision activities
- operate freely
- participate in public discourse, and
- engage in constructive dialogue with state actors

Each of these elements are important if the EU is to ensure greater engagement by civil society at European level.

The EU should establish a comprehensive civil dialogue framework under Article 11 TEU, formalised through a binding agreement between the European Commission, European Parliament, and Council. Each institution should also develop internal working documents to implement structured civil dialogue in their functioning. Member States should be required to engage with national civil society in the development of national positions on EU policies.

The proposed Civil Society Platform should serve as a structured, inclusive mechanism to ensure that the voices of organised civil society are integrated into the EU's democratic processes in a systematic and meaningful way. The Platform can be a core pillar for the implementation of a transversal civil dialogue, contributing to closing participation gaps. Its primary purpose should be to strengthen civic participation in shaping the political agenda. To this end, the Platform should not be restricted to but rather complement sectoral dialogue on fundamental rights, civic space, the rule of law and democracy. It should be coupled with clear outcomes and impact guarantees. The platform should provide a space for:

- Discussion, exchange and targeted recommendations on overarching policy issues.
- Reviewing the implementation of the different pillars of the Civil Society Strategy, the impact of EU policies on civil society, as well as the implementation and follow up of the Recommendation on participation of citizens and civil society organisations in policy making at the national level.
- Adopt a resolution on the policy priorities for the Commission's Work Programme and the State of the Union (SOTEU) speech.

We also recommend improving alignment at national level, for example creating designated contact points in each country to enable decision making. Currently, the onus is very much on already overstretched CSOs to take the time and initiative to engage. Realistically, these organisations will never possess the lobbying power of other sectors, so it is important that the EU meet organisations where they are by enabling and investing in structures at national level. This could be done through existing infrastructure such as the European Commission representatives and the European Parliament Liaison Offices.

Finally, we recommend increased investment into the CERV programme (see above) so that CSOs themselves can be funded to do research, run campaigns and events, and develop tools and other resources that allow them to feed into EU policymaking.

In your view, in which policy areas should civil society participation be further strengthened?

Engagement with civil society on policy development in Ireland varies widely. While organisations are often invited to respond to consultations, this does not always manifest in meaningful engagement on the part of the State. Areas of essential public interest, such as housing and health are particularly difficult to impact, despite the significant provision of services by sector organisations.

At EU level, participation should be systematically strengthened in all areas. Democracy, fundamental rights, and the rule of law should be seen as transversal principles guiding all areas of the EU policy-making and civil society should be engaged in all aspects to ensure EU policies are in line with these core values.

Civil society is essential to addressing the major societal challenges of our time, including but not limited to populism and the rise of the far right, misinformation, climate and sustainability,

poverty, inequality and social exclusion, health, demographic change and wellbeing, and issues affecting migrants and refugees.

CSOs need to be included and enabled to participate. This could be promoted through rewarding civil society participation in EU funding programmes like Horizon Europe, streamlining of funding application and management processes to enable more civil societies involvement, and revisiting funding rules to ensure civil society organisations can participate (e.g. low co-financing rates in programmes like the INTERREGS is a major barrier for nonprofit participation).

Are you aware of existing measures in your country to protect civil society organisations that are at risk? If so, please provide examples, in particular of any relevant best practices.

Organisations such as the Irish Council for Civil Liberties and Social Justice Ireland play a vital role in advocating for civil society as an essential component of a healthy democracy. Their continued funding is vital. More should be done to support advocacy organisations in Ireland. Many organisations who support vulnerable people are only funded to cover the cost of the services they provide and have little capacity to engage or advocate. The Scheme to Support National Organisations (SSNO) is a positive support but should be extended further.

Are you aware of existing measures at EU level to protect civil society organisations that are at risk? If so, please provide examples, in particular of any relevant best practices.

Protection measures remain fragmented, underfunded, and inconsistent. Key gaps include:

- No EU-wide protection mechanism for HRDs and CSOs operating within the EU.
- Existing instruments (EU Guidelines on HRDs, ProtectDefenders.eu, EU SEE) focus almost exclusively on external action; any support for EU-based actors is ad hoc.
- No rapid-response funding for urgent protection needs.
- No formal follow-up on reprisals against those engaging with EU institutions.
- No clear link between reporting and concrete EU action.

As a result, EU-based HRDs and CSOs at risk often lack timely, structured support and must rely on emergency mobilisation by peers.

Some recent positive developments include:

Annual Rule of Law Reports, which touch on civic space under “checks and balances,” but with limited coverage of freedoms of association, assembly, and HRD protection.

EU Anti-SLAPP Directive, offering procedural safeguards and early dismissal of abusive lawsuits in cross-border public interest cases.

CERV programme funding for civic space monitoring and alert mechanisms, though largely project-based and not suitable for legal aid or strategic litigation.

EU Directive on Violence Against Women, which recognises attacks on HRDs as an aggravating circumstance.

EU Artificial Intelligence Act, with provisions for transparency and accountability, but insufficient safeguards against surveillance and biometric misuse in policing and migration contexts.

What further measures could be considered by the EU to better protect civil society organisations that are at risk?

Establish an EU-wide Monitoring and Alert Mechanism on civic space, with early warning capacity and a clear mandate for follow-up by EU institutions. The findings should be collected in a standalone civic space chapter within the Rule of Law Report with country-specific recommendations. Develop EU guidelines for preventive action against civic space deterioration, including engagement by EU country representations. Create a rapid-response protection mechanism for HRDs and CSOs in the EU, offering emergency funding, and coordinated support with existing protection services including legal assistance. Support the establishment and consolidation of national civil society protection hubs and solidarity networks.

How important do you think it is to provide public funding at EU and national level for civil society organisations' activities to support them in the various roles they play in society (e.g. advocacy, support services, watchdog function, awareness raising, etc.)

Funding for civil society and EU and national level is vital to supporting organisations that protect and provide for marginalised and vulnerable people across Ireland. The challenges detailed above put at risk the support we provide to these groups and create uncertainty and instability when the opposite is required. We recommend

Match funding

The EU should recommend the establishment of a match funding facility at member-state level to support civil society participation in EU funding programmes with low co-financing rates such as the Interregs. They can also collect and share best practice of countries that are doing this and promote models that work and are the most inclusive. This would support the Quadruple Helix model of the academic, private, public and civil society sectors all working together to solve problems. Without meaningful support for civil society groups to participate, this model cannot work.

Ringfenced funding for civil society

The EU should impose stronger controls on EU funding managed at national level to ensure that a reasonable portion of funding is ringfenced for civil society, is accessible, and that opportunities are disseminated adequately to promote open and transparent distribution of EU funds.

Consultation with and inclusion of civil society in the design and management of EU funding programmes

It is important that consultation and co-design processes are meaningful and not just tokenistic or an afterthought. Full, strategic partnerships should be sought with civil society in order to achieve shared goals.

Increase accessibility of EU funding

Applications and reporting requirements should be streamlined, so that smaller civil society organisations have a fair chance to access funding.

Adjust funding available vs impact expected in line with rising costs in the next Multiannual Financial Framework (MFF)

In countries with higher costs of living, EU funding is becoming increasingly unsustainable as the expectation of funding agencies vs the funding they are willing to provide are completely unequal – particularly for civil society organisations, who are constantly under-resourced and operating on shoe-string budgets. As such, many organisations end up turning down EU funding opportunities because the funding does not cover enough of what it would cost to deliver programmes, and they simply cannot afford to take that financial hit.

Protect and expand CERV in the next MFF

It is essential that CERV is not just protected but expanded in the next MFF to respond to rising threats to our sector, including the rise of populism, hate, attacks on civic freedoms and the unprecedented rise of misinformation, which disproportionately affects our sector.

What are the main obstacles preventing civil society organisations from fully benefiting from public funds at national or EU level?

As detailed above, there are significant barriers to civil society organisations in Ireland benefitting from public funds at national and EU level. These include issues around accessibility, a lack of match-funding and ring-fenced funding, a need for meaningful consultation processes and assessment of funding requirements for EU programmes.

CSOs face multiple barriers in accessing public funding. At national level, opportunities are often limited to short-term, project-based grants, which undermine sustainability and restrict capacity for strategic work such as advocacy. Application and reporting procedures are overly complex and resource-intensive, disadvantaging smaller organisations. Funding priorities are sometimes politically biased, with governments excluding critical voices. At EU level, the CERV is valuable and the regranting mechanism through national civil society intermediary is a crucial innovation, but it remains underfunded and administratively burdensome. Co-funding requirements act as a major obstacle especially in the context of fragile philanthropy ecosystem for democracy and rule of law work. Across both levels, there is a lack of structured civil dialogue to jointly define funding priorities.

Are smaller, grassroots or marginalised community-based civil society organisations adequately supported by existing funding mechanisms?

Many small and medium-sized organisations in Ireland struggle to access funding. People working in civil society understand the importance of transparency in their work; many worked for years to encourage the establishment of Ireland's Charities Regulator. The sector as a whole welcomes regulation, and community and voluntary organisations work tirelessly to attain the

highest standards of governance. However, processes have become excessively bureaucratic, repetitive, and detailed. While staffing and resources for regulatory bodies continues to expand, sector organisations require increased resourcing and training to keep pace.

In our recent members' regulation survey, complexity of compliance and time spent on this rank among the top member concerns. This particularly affects smaller organisations.

At EU level, smaller, grassroots or marginalised community-based civil society organisations effectively alienated from EU funding. The Wheel runs a service called Access Europe (www.accesseurope.ie) to help organisations access and manage EU funding. Even with this extra support, many organisations do not have the capacity to apply for and manage EU funding.

The system is jargonistic and difficult to navigate. The requirement for EU partnership can be a major barrier. The applications themselves, even for relatively small sums of funding, can be 70+ pages and ask repetitive and complex questions. The online portals are confusing and not user friendly. There are few entry-level opportunities. Even for organisations with dedicated funding staff, EU applications can take weeks to prepare and there is a low chance of success. The vast majority of small organisations simply cannot dedicate that kind of time or take that risk. Even if they take the risk and are funded, the reporting burden for programmes outside of those using the “lump sum” system like Erasmus+ is onerous and intimidating. It is beyond the realm of possibility for the vast majority of organisations.



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