Civitates is launching an open call to support organisations in France and Ireland that can contribute to the national enforcement of the Digital Services Act (DSA) and other related EU tech regulations with a focus on improving online public discourse and addressing how technology mediates and changes the way information is accessed, spread and consumed everyday and in key moments for democracy, such as during elections.

BACKGROUND

Technology has transformed our relationship to information access and consumption. Social media platforms are influential spaces where societal questions are debated and where most people get access to news. Search engines are the gateways through which we access information in a quick and convenient way on a daily basis.

While the original promise was to give us unlimited access to knowledge and information, these services often give us a selection of information and content that is skewed, partial and leaning towards the extremes. The ranking and recommender systems of online platforms, powered by surveillance advertising, while promising a more tailored and efficient experience for users, are actually designed to serve the economic models of tech companies by maximising engagement and pushing paid content even when misleading or non factual.

On top of this, the advancement of Artificial Intelligence and Generative AI - whose models are increasingly integrated directly into social media platforms and search engines - increases the risks of simplifying the production and distribution of content that is illegal or harmful (e.g. disinformation, AI-generated non-consensual imagery, etc.) to individuals, marginalised groups, and our democracy.

The result is the more polarised and untrustworthy environment that we experience everyday and more so, ahead and during election times. These are the moments where public discourse is particularly under stress as controlling and manipulating information and narratives - also through disinformation, propaganda and foreign interference - can be key for political wins.

The latest wave of EU tech regulations (Digital Services Act, Digital Markets Act, Transparency and targeting of political advertising regulation, Artificial Intelligence Act, European Media Freedom Act etc.) attempts to address these issues by establishing transparency and accountability mechanisms, by balancing free speech and freedom from harassment online, by increasing the protection of online users and expanding citizens’ rights. It is extremely important for our democracies that these regulations
follow their intent to build a better online environment and are not weaponised to silence communities or legitimate content: civil society has an important role in denouncing those practices, if and when they occur.

In this context, while the EU institutions have been the primary focus in the advocacy efforts behind the development and adoption of these regulations, Member States are extremely important in the enforcement phase. Digital Services Coordinators - DSCs, beyond being directly responsible for a vast ecosystem of large, medium and small platforms, can act as the central hub for complaints by users and for data access by researchers, whatever is the size of the targeted platform. More generally, there is a need to promote the new rights defined by these regulations, including through awareness raising at the national level. Finally, although most of the new EU legislation is directly applicable to the national level, we cannot discount the risk that national regulations might limit the way these safeguards are applied at national level: at the same time there should be space at national level to promote legislative initiatives that further strengthen the framework that the DSA and other regulation put in place.

In order to address the many challenges of tech regulation enforcement at national level, we believe that tech-focused organisations need to work with a broader national ecosystem that can bring topical expertise (e.g. election integrity, transparency, mental health, political polarisation, racial or gender discrimination, hate speech etc.). With its work, civil society can contribute to hold Big Tech and public institutions to account, get a clearer understanding of online platforms and algorithmic system functioning, and build a new vision for a safer and better online environment.

ABOUT THE CALL FOR PROPOSAL

The call for proposal is open to civil society organisations working in France and Ireland. These two countries were identified as priority for 2024 based on a series of criteria considering both their relevance for the European platform regulation landscape, potential threats and opportunities in terms of national level regulation, the state of civil society and accessibility of funding.

Funding

Civitates will provide flexible, core support over two years. Core funding can cover staff costs and operational expenses. In the case of coalitions or networks it can cover the costs related to coordination and/or collective activities: funding might also be redistributed to coalition partners, following Network of European Foundations\(^1\) rules on re-granting (see ANNEX 1). In case of re-granting, Civitates will provide feedback and

\(^1\) Civitates is an initiative hosted by the Network of European Foundations. More information on https://www.nef-europe.org/
guidance to the shortlisted candidates during the due diligence calls (more information in the SELECTION section)

The total budget for this call is €1,000,000. Civitates aims to support up to six organisations across Ireland and France under this call. This number might be adjusted depending on the number of applications received.

APPLICATION guidelines

Eligibility

Civitates looks for key civil society organisations working in France and/or Ireland. Civitates regards an organisation as a “key” actor if it:

- is a registered non-profit organisation or can prove that its work has a non-profit nature and any profit from its activities are reinvested in the organisation;
- has a track record of working at national level in France and/or Ireland;
- brings expertise on tech and/or on topics relevant for public discourse (e.g. election integrity, transparency, mental health, political polarisation, racial or gender discrimination, hate speech etc.);
- works in coalition, networks or can prove to collaborate with different stakeholders (CSOs, decision makers, etc).

Legal registration and physical presence of the team in one of the priority countries is not a mandatory requirement.

Organisations that have a track record of working both in France and Ireland can submit a single application and elaborate their plans regarding both countries. These organisations will not be automatically preferred to organisations working in a single country.

Coalitions, networks or other groups of organisations can submit a single application but they need to identify a lead applicant and elaborate their plans as a coalition and how members will individually contribute to the work.

Exclusion criteria:

- Political party-affiliated organisations

Focus and scope

Building on the 2024-2028 strategy, the Tech and Democracy sub fund aims at building a cohort of organisations working on improving online public discourse and addressing how technology mediates and changes the way information is accessed, spread and
consumed everyday and in key moments for democracy, such as during elections. The Digital Services Act (DSA), because of its goal of “ensuring a safe, predictable and trusted online environment” is considered central in addressing these issues. However, recognising that the different EU regulations interact with each other and in line with the commitment to core funding, applicants can include activities that are targeting other regulations addressing the aforementioned issues. Applicants are also invited to reflect on how national level regulations might limit or facilitate the enforcement of DSA and said regulations.

Civitates welcomes a variety of approaches and activities from potential grantees. Below is a non-exhaustive list of examples:

- advocacy towards national level governments on the set-up of DSCs or other relevant national-level authorities;
- research, technical analysis and data collection for advocacy, campaigns and enforcement purposes;
- campaigning and public awareness raising activities to encourage users to enforce their rights under the DSA and other related tech regulation;
- campaigning activities that target platforms and/or the European institutions for proper enforcement and better practices, considering the specific national context and issues;
- advocacy towards DSCs and national authorities to initiate investigations and include civil society representatives in the process;
- creating a pipeline of evidence to substantiate regulatory complaints and/or support strategic litigation;
- monitor the work of the DSC and any other relevant national authority to identify, denounce and keep them accountable on any authoritarian use of the DSA and other related EU tech regulations;
- use the complaint mechanisms by individual or representative organisations to initiate judicial proceedings at Member State on illegal/harmful content or suspension, termination or restrictions to accounts;
- building up the trusted flaggers community;
- preparation of reports of national issues in ways in which they can be used by other regulatory or advocacy efforts at EU level, and/or at international and global level.

Applicants are invited to include only approaches they deem feasible considering their expertise, capacity, and assessment of their national context.

*Required documentation*
Applications should be submitted through the Network of European Foundations (NEF)’ Optimy portal and include the following documents:

- Narrative proposal
- Budget proposal
- Due diligence questionnaire
- Last official three annual financial reports of the organisation (2021, 2022, 2023)
- The operational budget of 2024
- Registration documentation (as a non for profit or as a for profit reinvesting their surplus into the company)
- CVs of leadership

**Content**

Applicants are asked to elaborate on the following elements:

1. **Context - Threats and Opportunities**
   Applicants are asked to provide their assessment of the possible threats and opportunities to work on a proper enforcement of the Digital Services Act and related EU tech regulations in the target country-ies.

2. **Your track record**
   Applicants are asked to describe their track record in working in the target country-ies.

3. **Your purpose, approach and scale**
   Applicants are asked to elaborate on their approach, what they see as their unique contribution and how they will evaluate their work.

4. **Partners and connections**
   Applicants are asked to describe the strategic partners with whom they collaborate at national and European (if applicable) level and the stakeholders they are working with or will target.

5. **Your needs**
   Applicants are asked to explain how Civitates’ contribution will help strengthen or expand their work.

6. **Diversity, Equity and Inclusion**
   Applicants are asked to elaborate on how they incorporate the values of diversity, equity and inclusion in their governance and their operations. While this section is not directly part of the evaluation criteria we have included it to map a way forward as Civitates defines its own DEI approach to grantmaking.
Amount
Applicants may submit only one proposal per organisation. The maximum amount and duration of the grant is €200,000 for two years. A realistic and efficient use of the budget will be considered as part of the evaluation.

Language
Due to internal constraints the application and reporting material need to be in English. Applicants who are not comfortable writing in English can use a translating tool of their choice. In order to reduce misunderstandings, applicants that are using translation tools are invited to a) indicate in the application which translation tool they have used b) include the original text at the bottom of the application. Note that project outputs (e.g. publications, reports, advocacy letters etc.) do not have to be in English.

Deadline
The deadline for submitting applications is 9 September 2024 at 11 pm CET.

On 9 July 2024 Civitates will host a webinar to present the open call and to answer questions: prospective applicants can register through this Zoom link.
A list of FAQ will be published on Civitates website integrating any missing information that will integrate these guidelines.

Questions regarding the application process can be directed to the following e-mail address: secretariat@civitates-eu.org with the following subject line: SF2 Call 2024.

SELECTION
Applications that are submitted by the deadline and include all the necessary documentation will be reviewed by the Civitates team and a group of external, independent evaluators.

The Civitates team and external evaluators will only consider applications that fulfil the eligibility criteria (above) and will rank applications based on the evaluation criteria outlined below in order to compile a shortlist of candidates for the final selection.

As part of the selection process, applicants may be asked to join a short call to complete the due diligence evaluation and clarify any doubt on the proposal that might have arisen in the reviewing phase. The shortlisted proposals will be reviewed in November by a Selection Committee made of representatives of Civitates’ foundation partners. Beyond assessing the proposals against the evaluation criteria, the Selection Committee will consider how to establish a diverse and strong cohort of organisations in the two countries.
Applicants will receive written notification of Civitates’ final decision by the end of November 2024. Please note that Civitates is not obliged to provide detailed explanations of its decisions.

The grants are expected to start on 1 January, 2025

Evaluation criteria

- **Contextual analysis**: the organisation has a strong understanding of the national level landscape and possible threats and opportunities in enforcement;
- **Track record**: the applicant has a strong track record of impactful working in the target country-ies;
- **Relevance**: the applicant deploys approaches that are realistic, impactful and relevant for the challenges and opportunities identified;
- **Partnerships and target audience**: the applicant identifies relevant partners and constituencies to involve or target in their work;
- **Budget**: the planned budget and its items are relevant, balanced and reflect priorities of the organisation.

REQUIREMENTS DURING THE GRANT PERIOD

Grantees will submit annual financial and narrative progress reports one year after the start of the grant and a final report within 30 days after the end of the grant.

Additional opportunities for funding are highlighted in the ANNEX 2.
ANNEX 1 - RE-GRANTING

In case of re-granting by the lead applicant to other organisations, the following three aspects need to be considered.

Memorandum of Understanding

The Network of European Foundation requires a Memorandum of Understanding (MoU) between the lead partner who will be disbursing the funds and the other partners for (re)grants of 15,000 EUR and above. In those cases lead applicants are expected to agree on a clear, detailed and well framed MoU with the other organisations in order to mitigate risks associated with partnerships.

The MoU should include:

- Rationale for the partnership;
- The roles and responsibilities of each partner (well detailed with complementarities, and former experience in working jointly if existing);
- Financial arrangements and budget breakdowns, including the payment schedule to each partner, the reporting requirements of each partner towards the lead partner, and the frequency of these reports.
- Provisions to resolve any conflicts that might arise during the partnership and legal avenues if necessary (e.g. arbitration, competent courts).

The MoU should be part of the grant agreement as an annex along with the proposal and budget.

The detailed MOU can be agreed upon between the moment the grant is approved and the signature of the grant agreement. It does not necessarily have to be part of the initial project proposal. NEF/Civitates can provide examples of MoU upon requests.

Budget

The proposal budget should detail the amount that will be distributed to each organisation.

Financial Oversight by the lead partner

In case of a re-granting of more than 30,000 EUR to a non-audited partner, a financial controller should be put in place to verify the use of the funds. However, if an organisation is equipped with a strong audited lead partner and well organised reporting through a strong MoU, then NEF and Civitates might not see the value of commissioning a separate audit for each organisation participating to the consortium (when they are not audited). This should be assessed in coordination with the NEF Senior Finance Manager.
ANNEX 2 - ADDITIONAL FUNDING

**Funding+: Learning and wellness Initiative**

Selected grantees will be automatically eligible for additional funding covering learning and wellness needs of the organisation. The current budget for each grantee is €5,000 in 2025 and might be renewed. During the grant period, grantees will identify how they would like to spend their budget and submit a request to the Senior Program Manager - Tech and Democracy. Below some examples of activities that can be included

**Learning**

- Participation in conferences and workshops
- Organisation of workshops and conferences
- Organization of (joint) trainings (i.e. language courses)
- (Cross-country) exchanges
- (Cross-country) site visits
- (Joint) consultancy support
- Small-scale research
- Joint campaign/event
- Fundraising activities (i.e. CERV application)

**Wellbeing**

- Participation in conferences, courses, or workshops related to well-being (i.e. mental health first aid, trauma-informed approaches, security training)
- Mental resilience group course
- Team well-being audit
- Team retreat or event
- Access to mental health and burnout prevention support (i.e. help of mental health professionals)
- Crisis intervention
- Additional leave for staff members (i.e. additional holidays)
- Improve diversity and inclusion (i.e. develop a DEI plan, unconscious bias training)

**Opportunity Fund**

The Opportunity Fund intends to address the needs of the national level field to work together through a series of smaller grants (€5,000 - €30,000). These grants are intended to strengthen the cohort in priority countries (i.e. France and Ireland for 2024), kickstart work in other EU countries where the field is less developed, and seize specific opportunities.

Some examples of activities include:
- covering the costs of a coordinator for national level coalitions;
- funding strategy convenings;
- supporting targeted research (e.g. stakeholder mappings, technical analysis, media and comms landscape research);
- collective training on specific needs (e.g. legal and policy courses, technical workshops etc.).

The fund is on invitation only and grants are awarded on a rolling basis. At the moment of its launch in May 2024 the fund was €150,000. Additional resources might be made available depending on the results of Civitates ongoing fundraising efforts.

Organisations that are selected to be part of the Civitates cohort to work in France and Ireland can submit a request for additional funding by contacting the Senior Program Manager - Tech and Democracy after the approval of their core grant.