

# 2021 CIVIL SOCIETY ORGANIZATION SUSTAINABILITY INDEX

TIMOR-LESTE
NOVEMBER 2022







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For Timor-Leste

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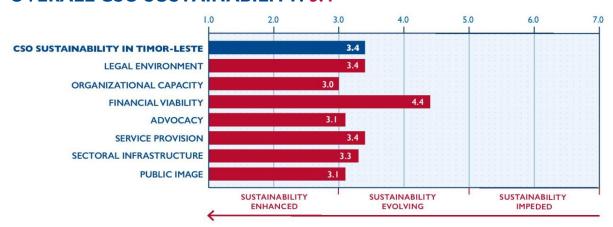
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# **TIMOR-LESTE**

Capital: Dili
Population: 1,445,006
GDP per capita (PPP): \$3,200
Human Development Index: Medium (0.607)
Freedom in the World: Free (72/100)

#### **OVERALL CSO SUSTAINABILITY: 3.4**



In 2021, Timor-Leste faced the ongoing impact of the COVID-19 pandemic, severe damage from a cyclone, and bureaucratic hurdles and delays in responding to both. In March 2020, Timor-Leste declared a state of emergency in response to the COVID-19 pandemic, which remained in place through most of 2021 as the country experienced two waves of increased COVID-19 cases. During the state of emergency, the government closed national borders, prohibited events and large gatherings, limited transportation, and mandated social distancing and quarantine procedures to limit community transmission of the virus. The state of emergency was lifted at the end of November 2021, but some COVID-19 measures remained in place, such as mandatory face masks and social distancing. Though Timor-Leste had recorded only a few cases of COVID-19 in 2020, by the end of 2021, the country had recorded 19,833 cases and 122 deaths. On April 7, World Health Day, the government began its COVID-19 vaccination campaign. By the end of the year, roughly half of the total population had received at least a first dose.

The already-difficult situation swiftly worsened in April 2021, when the country was struck by Tropical Cyclone Seroja. The cyclone caused extensive flooding, landslides, damage to infrastructure, livestock, and crops, and at least forty-four fatalities. The impact was especially evident in the capital city, Dili, where the majority of the population was affected and many families lost their homes and belongings. According to a World Bank report, the cost of recovery could exceed \$420 million. The devastation caused by the cyclone posed a significant challenge to the government, which was already focused on mitigating the impact of COVID-19.

The government lacked emergency funding to sufficiently support recovery in the wake of the cyclone, and significant bureaucratic delays notably impacted the government's interventions and relief for victims of the cyclone. Given the government's delays and limitations, the most active support came from international donors and agencies, United Nations (UN) agencies, religious organizations, and civil society, including national and municipal-level CSOs. Much of the affected population was housed in temporary shelters. CSOs worked to provide hygienic supplies and humanitarian support to those in shelters, while religious congregations supported the rebuilding of homes.

Although the broader environment was challenging, the overall sustainability of CSOs in Timor-Leste improved slightly in 2021. While the legal environment and financial viability remained unchanged overall, every other dimension of CSO sustainability recorded improvement over the course of the year. Benefiting from the experience of 2020 and increasingly prevalent training opportunities, organizational capacity in the sector improved moderately in 2021; the infrastructure supporting the sector also recorded moderate improvement, particularly due to a growth in training opportunities and intersectoral partnerships as all stakeholders worked together to meet emergency needs. CSOs provided urgently needed relief services in response to COVID-19 and Tropical Cyclone Seroja, and the public image of the sector moderately improved as media and others increasingly recognized the integral work of CSOs. CSO advocacy improved slightly in 2021 as the government was

increasingly responsive to CSO campaigns, aided by greater cooperation between the CSO sector and government representatives. CSOs were increasingly adaptable and responsive to the most urgent needs of their communities, even as financial support and staff capacity remained somewhat limited. The government and private sector continued to see CSOs as strong and vital partners in development, and the sector's public image remained strong.

According to data from the Ministry of Justice (MoJ), 79 national and 3 international associations were newly registered in 2021, as were 31 national and 2 international foundations. This brings the total number of registered organizations to 170 national and 2 international foundations, 609 national associations, and 85 international non-governmental organizations (INGOs). However, MoJ does not regularly update its database and many organizations registered with MoJ may no longer be active. According to the NGO Forum Timor-Leste (Forum ONG Timor-Leste, FONGTIL), a total of 223 national and 27 international NGOs were active in the country in 2021.

#### **LEGAL ENVIRONMENT: 3.4**



The legal environment regulating the CSO sector remained largely unchanged in 2021.

Law No. 5/2005 (Decreto Lei do Governo 5/2005) continues to govern associations and foundations. The law is written in Portuguese and translated into Tetun, the country's other official language, as well as English. However, the Portuguese version continues to take precedence if there is any misunderstanding, posing an ongoing complication to CSOs that predominantly use

Slightly easing the process of registration, in 2021, MoJ established a notary department in each municipality, enabling CSOs to register at the municipal level rather than needing to travel to Dili. In principle, organizations must register with MoJ before implementing any

programs, but some unregistered organizations were active in 2021.

In 2021, FONGTIL—an umbrella organization serving both registered and unregistered NGOs—held a meeting regarding the possible amendment of Law No. 5/2005. The meeting focused on the fact that though an article of the law specifically requires that organizations established in Timor-Leste be registered with MoJ, it does not address organizations established elsewhere that operate in the country, allowing several organizations to operate without registration in the country. The discussion was ongoing at the end of the year.

As in 2020, MoJ sometimes rejected organizations' names, especially those that referred to the resistance or national identity, complicating the registration process. In 2021 FONGTIL held a meeting with MoJ notary staff to discuss the issue. The law also requires each organization to have a bank account, but the requirement is not applied consistently. These complications continued to make some organizations hesitant to apply for registration, particularly when combined with the need to translate all documents into Portuguese.

The law does not limit the scope of a CSO's work and the government generally does not interfere with CSOs' activities. However, in 2021, CSOs and informal movements continued to lobby against a draft amendment to the criminal code regarding criminal defamation. As drafted, the amendment would threaten to criminalize all defamation, thereby threatening individuals and organizations for criticizing the government or sharing information. Following the public pushback, the draft law was shelved in March 2021 but remained a concern.

CSOs are legally permitted to organize or participate in demonstrations but must notify the national police in advance. Demonstrations within 100 meters of government offices and the national parliament remain restricted.

CSOs do not pay taxes on their grant income but must pay taxes on imported goods. According to the Law on Taxation (Lei Tributária No. 8/2008 de 30 de Junho), employers should collect taxes equal to 10 percent of the income of employees who earn more than \$500 per month. However, CSOs, especially Timorese organizations,

struggle to adhere to this requirements. Therefore, typically only staff that work for INGOs and CSOs working at the national level comply with the law. Every organization is required to have a Tax Identification Number (TIN).

CSOs are legally permitted to earn income, engage in fundraising campaigns, and accept funds from the government and international donors. However, Catholic organizations' access to funding was made more difficult in 2021. A change to an ongoing agreement between the government and the Church (*Câmara Eclesiástica*, Ecclesiastic Chamber) determined that support from the Office of the Prime Minister would go directly to each Diocese, which would then allocate the funding; this change was implemented beginning in 2021. Previously, all religious organizations were able to submit proposals for funding directly to the Office of the Prime Minister. Non-Catholic organizations are still able to do so, while Catholic organizations must now go through the Diocese.

There is some in-country capacity for legal assistance, particularly around public policy, but national and municipal-level CSOs typically lack the funds for legal assistance and there are no Timorese lawyers with expertise in CSO-related regulations.

#### **ORGANIZATIONAL CAPACITY: 3.0**

The organizational capacity of CSOs in Timor-Leste moderately improved in 2021, largely due to improvements in technical capacities, internal management, and increased training for CSO staff.

CSOs proved resilient in adapting to the challenges of 2020. With that experience, they were better equipped to respond to the ongoing impact of COVID-19 in 2021, while remaining adaptable in the face of additional needs and obstacles. Most CSOs maintained strong relationships with their constituents, continuing to communicate over the phone and through messenger platforms like WhatsApp. Beginning in 2021, some CSOs were also able to return to engaging with constituents in person. Parliament recognized CSOs' role in responding to the health crisis and allowed some organizations to



ORGANIZATIONAL CAPACITY IN TIMOR-LESTE

receive licenses from the Integrated Center for Crisis Management (ICCM) that enabled them to work in the field during lockdown periods.

Most CSOs have statutes that clearly define their missions and strategic plans for periods of three to five years. While registration requires the establishment of basic statutes, strategic planning is typically spurred by donor requirements. As in 2020, in 2021, organizations often shifted away from their defined missions and planned activities in order to respond to the most urgent needs as well as they could with limited resources. Many activities remained on hold due to COVID-19 restrictions, but CSOs continued to provide humanitarian support as they worked to prevent and mitigate the impacts of COVID-19.

CSOs generally have boards but board members rarely offer active support or contribute meaningfully to organizational governance. There was some progress in 2021, however, when FONGTIL members conducted a social audit program and provided several recommendations in order to improve the internal management policies and structures of CSOs, which were swiftly implemented. For instance, by the end of 2021, most organizations had established internal policies and procedures addressing sexual abuse and fraud, a clear improvement since 2020. FONGTIL also advised that the founder of an organization should not also be its director; this recommendation remained under discussion at the end of the year.

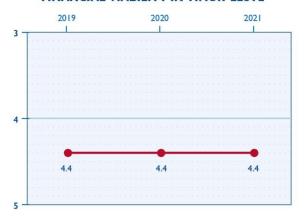
CSO staff capacity notably improved in 2021, benefiting from trainings over the course of the year and the application of lessons learned in 2020 capacity-building workshops. However, staff turnover continued to be a problem as skilled and qualified staff are often hired by the government or other institutions. CSOs typically recruit staff on a project basis; project staff are then trained in relevant programming and other skills.

CSOs' technical capacity continued to improve in 2021, as they necessarily shifted to more online work. The majority of CSOs were able to access the internet and information and communications technology (ICT) in 2021,

and even at the municipal level, CSOs expanded their online work from WhatsApp and e-mail to platforms like Zoom, Microsoft Teams, and WebEx.

#### **FINANCIAL VIABILITY: 4.4**

#### **FINANCIAL VIABILITY IN TIMOR-LESTE**



The overall financial viability of the CSO sector remained unchanged in 2021. Though both foreign and local funding declined, the government continued to provide much-needed assistance to the sector. Organizations reported that available funding, though less than previous years, tended to be more flexible in 2021. Some CSOs also improved their ability to earn income, and others benefited from improvements in their financial management systems and policies.

The majority of CSOs in Timor-Leste depend on funding from international donors and the government. Some organizations receive funding from multiple donors, which allows them to sustain their activities. Most organizations, however, continue to struggle to diversify their financial resources and rely primarily on short-term

project funding.

Through the annual state budget, the government provides support for CSOs for both programmatic and operational costs. In 2020, the prime minister announced a new government commitment to support CSOs every fiscal year, channeling those funds through FONGTIL. In 2021, 145 CSOs received a total of \$2,158,225 in government funding. Though this was a notable decrease compared to the \$3.2 million the Office of the Prime Minister allocated for CSO support in 2020, the lengthy delay in budget approval in 2020 had delayed transferring any funds until November 2020. In contrast, in 2021, CSOs immediately benefited from the much-needed support, and the government extended the deadline to use the funds to March 2022.

Organizations are invited to apply for funding from the Office of the Prime Minister, so long as they collaborate with government authorities to achieve the agreed upon objectives. While the government funds both national and municipal-level CSOs, it often gives priority to local organizations over Dili-based national CSOs.

Some CSOs have raised concerns about the selection of proposals and noted that the government selection process can be opaque, failing to explain why some CSOs are rejected while seemingly less competent organizations receive support. Some experts reported that government decision making may be biased by personal connections or other conflicts of interest. However, CSOs sometimes hesitate to report concerns about the selection process, for fear that criticism of the government might impede their chances of receiving support in the future.

The ongoing financial impact of the pandemic continued to limit funding opportunities from bilateral donors and international agencies, which slightly reduced their support to CSOs in 2021. During the year, foreign donors again prioritized programming around COVID-19, forcing CSOs to cancel or postpone other activities. Foreign funders tend to focus their support on programmatic, not operational costs or staff salaries. Some donors fund the provision of assets that are necessary to implement activities, but then request that those assets be returned at the end of the project. Regardless, CSOs continued to rely heavily on foreign support. The European Union- and UNfunded Spotlight Initiative, for instance, continued to support efforts to eliminate harmful practices and violence against women and girls. The initiative, launched in 2020 with a total budget of \$15 million over three years, is implemented by the government and local CSOs such as Belun, Asia Justice and Rights (AJAR), Asosiasaun Chega! ba ita (ACbit), and others. Religious organizations also received emergency program support through Santa Sé, the representative of the Pope in Timor-Leste, which has signed a memorandum of understanding (MoU) with the government.

There was no record of private sector support to CSOs in 2021, though some companies collaborated with CSOs to provide humanitarian or in-kind support to communities in need.

Few CSOs in Timor-Leste actively engage in fundraising, and as in 2020, there were no known instances of fundraising activities. FONGTIL continued to collect membership fees, as established in its internal regulations.

While most CSOs continued to struggle to earn additional income, some increased and improved these efforts in 2021. For instance, some community groups working with women and youth were able to earn profit through agricultural activities and the production of handicrafts. Some CSOs have also begun to earn income by renting out meeting rooms or vehicles.

The majority of FONGTIL member CSOs—encompassing a wide range of international, national, and local CSOs—have internal financial management systems in place, which increasingly include anti-fraud and anti-corruption policies. Community-based organizations, however, have less capacity. Some donors provide financial guidelines to ensure compliance with proposed budgets, though some flexibility was permitted due to the impact of COVID-19 on project implementation. Some CSOs conduct annual audits, but this is largely dependent upon their having the resources to do so. All CSOs that receive government funding are required to submit annual reports to the government, and many publish their reports to fulfill donor requirements and inform their primary stakeholders and partners about their work.

#### **ADVOCACY: 3.1**

CSO advocacy saw a slight improvement in 2021 as the government was increasingly responsive to CSO advocacy campaigns, aided by greater cooperation and communication between the CSO sector and government representatives.

The government continues to recognize CSOs as active development partners, and CSOs are legally guaranteed the right to demonstrate and criticize decisions of the government or National Parliament. As in 2020, even as pandemic restrictions continued to limit in-person gatherings, CSOs experienced no additional challenges to advocacy and remained actively engaged in 2021.

During the year, CSOs provided recommendations to the government through reports and an ongoing talk show, in which they discuss the most relevant issues in 3 2019 2020 2021 3 3.1 3.2 3.2

**ADVOCACY IN TIMOR-LESTE** 

their communities. CSO research, for example, highlighted the impact of COVID-19 restrictions on communities, including a rise in gender-based violence, and alerted government authorities to basic needs. FONGTIL's media center has become a primary channel for CSOs to share information with the government and advocate on behalf of their communities. For instance, following conflict between some police officers and members of the community violating lockdown orders, FONGTIL and its members used the media center to highlight the case, ultimately spurring a formal investigation.

CSOs also directly cooperated with the central government around several draft laws. For instance, in 2021, Rede Feto, a network of organizations working to promote gender equality and women's empowerment, worked closely with the government through the Secretary of State Equality and Inclusion, with technical support from UN Women. This collaboration and advocacy ultimately resulted in National Parliament's approval of a human trafficking law in 2021. CSO advocacy also resulted in the successful approval of the stalled Children's Rights Law. In 2016, the draft law had been discussed and submitted to parliament for approval, but further discussions were postponed. With a push and recommendations from Rede Feto, the draft law was unanimously approved by National Parliament in September 2021 and proceeded to further discussions with relevant entities like the Women's Parliamentary Group of Timor-Leste (Grupo das Mulheres de Timor-Leste, GMPTL).

Also in 2021, through discussions with the Secretary of State of Professional and Employment Training (SEFOPE), CSOs recommended the drafting of a Specific Domestic Labor Law. After speaking at the FONGTIL media center, SEFOPE committed to following up on the law; the possibility of a new law remained under discussion at the end of the year.

The Justice System Monitoring Program (JSMP), a CSO, provided legal advice to the National Parliament about proposed laws. For instance, in 2021, JSMP provided opinions to the National Parliament on draft laws related to pardons and commutation of sentences, the election of the president and electoral administration bodies, and voter registration. JSMP also pressed policymakers to prepare and circulate drafts in Tetun, in addition to the original Portuguese, to better enable input from and socialization among relevant CSOs and the public

CSOs also provide oversight of the government. In 2021, though the country was reeling from the impact of both COVID-19 and flooding, the government spent much-needed resources to participate in the Dubai Expo; allegations additionally suggested that some government representatives used public funds for their families to travel to and participate in the event. FONGTIL reported the case to the court and advocated for an investigation into the misuse of government funds. That investigation was ongoing at the end of the year.

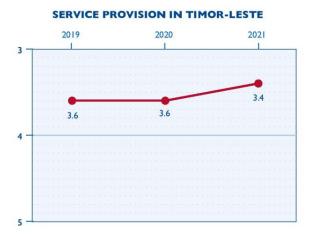
In 2021, CSOs were very comfortable with the concept of lobbying and readily organized meetings and dialogues with government officials in order to present their research findings and reports. These efforts demonstrated strong communication between the CSO sector and relevant ministries, and CSOs had ample opportunities to speak with members of the National Parliament.

In 2021, FONGTIL again conducted social audits of several government programs, recommended adjustments, and called for the government to establish a system to measure the implementation of recommended changes in each sector. The Decree Law, which would institutionalize such audits and was submitted to the Council of Ministers in 2020, was successfully passed in 2021.

As in 2020, CSOs' social audit reports continued to influence the government's budget allocation and highlight other areas of concern. For instance, in response to lobbying from CSOs like Rede Feto, the National Parliament recognized the need for and required gender budgeting in all line ministries, though only some ministries have implemented it thus far. Still, not all CSO recommendations are taken into consideration in public policies, and government follow-up and implementation are sometimes very limited.

In 2021, FONGTIL held a meeting regarding the possible amendment of Law No. 5/2005 to specifically regulate organizations established outside of Timor-Leste that operate in the country, as discussed above. Beyond that, advocacy for CSO law reform was limited. Though CSOs were actively engaged in efforts against the defamation law in 2020, arguing instead for a more democratic Cybercrime Law to regulate the online space, both were tabled and little discussed in 2021.

#### **SERVICE PROVISION: 3.4**



CSO capacity to provide services moderately improved in 2021 as CSOs were increasingly responsive to their communities in the wake of both the COVID-19 pandemic and Tropical Cyclone Seroja.

In the past, CSOs in Timor-Leste provided services in diverse programmatic areas, including human rights, peacebuilding and conflict prevention, gender and social inclusion, youth engagement, agriculture, education, advocacy, humanitarian support, and research. In 2021, given the ongoing impact of COVID-19 and the added devastation brought by Tropical Cyclone Seroja, most CSOs focused on basic social services and humanitarian support, putting less urgent activities on hold.

CSOs were significantly more adept and efficient in responding to urgent needs in 2021. They better utilized

virtual platforms to facilitate their work and were typically the first to provide support to communities in need. Continuing their work in response to the COVID-19 crisis, in 2021, CSOs set up hand-washing stations in public areas like local markets, schools, churches, and community centers. CSOs were also vital partners for government relief efforts, despite their limited budgets and staff capacity. For example, CSOs were key government partners in the COVID-19 vaccination campaign, helping to distribute information and encourage communities, especially in

rural and remote areas, to get the vaccine once it became available. In addition, CSOs conducted needs assessments and monitored the implementation of government programs at the community level.

The FONGTIL media center, established as a temporary platform in 2020 to share information about COVID-19, was increasingly active in 2021. During the year, it served as an integral source of trustworthy information for both the community and the government.

CSOs do not discriminate in the selection of their beneficiaries on the basis of race, culture, religion, or gender. In 2021, CSOs rapidly expanded their services to meet the needs of displaced communities following the April cyclone and flooding, offering humanitarian support even before government intervention. Members of Rede Referral (Referral Network), such as Rede Feto, AlFeLa (Asistensia Legal ba Feto no Labarik, Legal Assistance for Women and Children), and Psychosocial Recovery and Development in East Timor (PRADET), also provided support and safe spaces for women and children in temporary shelters. Humanitarian support from CSOs was particularly necessary in 2021 because it was provided directly to communities in need, whereas government support was typically channeled through community leaders and therefore was more at risk of biased or uneven distribution.

CSOs continue to provide their services for free, using funding from international donors and the government.

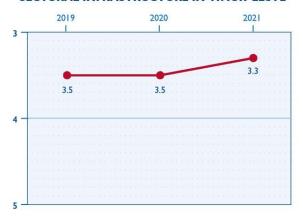
In 2021, CSOs remained key government partners. Government authorities recognized the value of their support particularly in responding to emergency needs and aiding the most vulnerable communities at both national and local levels.

#### **SECTORAL INFRASTRUCTURE: 3.3**

The infrastructure supporting the CSO sector moderately improved in 2021 due to increases in CSO training opportunities and partnerships with the government and private sector to meet emergency needs.

FONGTIL continues to serve as a valuable platform and support organization for CSOs, facilitating the capacity building of its members and coordination both within the sector and with government authorities. Responding to previous assessments of the CSO sector, in 2021, FONGTIL provided training for its members on advocacy, organizational and leadership management, financial policy, sexual abuse policy, and fundraising, with all materials available in Tetun.

#### SECTORAL INFRASTRUCTURE IN TIMOR-LESTE



In 2021, UN Women's Spotlight Initiative Program, with

funding from the European Union, also provided trainings on gender-based violence for CSOs at the national and municipal levels; CSOs that participated in the trainings then held a workshop to integrate gender issues into the National Program for Village Development program. The USAID/Timor-Leste NGO Advocacy for Good Governance Activity conducted capacity-building activities on program and financial management, advocacy, research, and analysis for NGO partners both virtually and in person, in compliance with health protocols. This was a notable improvement compared to 2020, when most trainings were suspended due to restrictions on gatherings and CSOs' prioritization of COVID-19 relief work.

While no local organizations or foundations provide local funding to CSOs, a few organizations sub-granted foreign support in 2021, as in 2020. In addition, some local companies provided humanitarian support and basic supplies to CSOs, to be distributed to those most affected by the impact of COVID-19 and the cyclone.

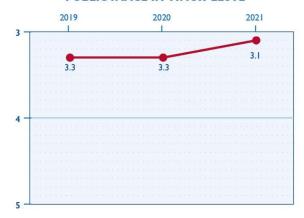
In 2021, CSOs continued to engage in coalitions and networks to strengthen their relationships and improve their effectiveness and impact, at both national and local levels. These networks included, for instance, Baucau Assocation in Baucau Municipality and the Referral Network in Covalima; CSO engagement in these platforms included monthly meetings to provide activity updates and develop action plans, such as in providing legal

assistance and shelter to victims of gender-based violence. Other CSO collaborative efforts held joint meetings to share updates on and plan campaigns around issues relating to land, human rights, women and youth issues, people with disabilities, and members of the lesbian, gay, bisexual, and transgender (LGBT) community. CSOs also collaborated over the course of the year as members of the government taskforce for combating the COVID-19 pandemic, launched in 2020 and continuing through 2021.

In 2021, CSOs increasingly collaborated with other sectors, including the government, the private sector, media, and religious organizations. As in 2020, these intersectoral partnerships particularly focused on preventing and mitigating the impact of COVID-19. For instance, the private sector continued to supply disinfectant and masks, while CSOs coordinated the distribution of that support. Also in 2021, several CSOs working in the agricultural sector established a syndicate to help farming communities better communicate with the Ministry of Agriculture, private sector, and suppliers. CSOs working alongside the government have also served as resources for several ministries in program implementation, particularly in work tied to gender issues—such as promoting gender budgeting in the line ministries, as discussed above—and providing policy recommendations to combat corruption and collusion.

#### **PUBLIC IMAGE: 3.1**

#### **PUBLIC IMAGE IN TIMOR-LESTE**



CSOs' public image moderately improved in 2021 as positive media coverage of CSO work grew, both through news outlets and the continued development of FONGTIL's media center. The private sector also demonstrated somewhat more positive perceptions of CSOs, setting aside previous hesitations to focus on collaborative responses to emergency needs in 2021.

CSOs enjoyed increasing and positive media coverage in 2021, especially regarding their work around COVID-19 health protocols and the vaccination campaign. CSO work was frequently featured on national television, and some organizations collaborated with community radio to promote their activities. In some cases, however, media coverage focused on the involvement of government representatives rather than on the work

itself, and it could be difficult for CSOs to maintain media attention. Both Timorese and international CSOs also provided media with summaries of their activities to encourage coverage, but the provided material was sometimes then poorly edited and misinterpreted when published by Timorese media. FONGTIL's media center also provided greater media coverage of CSO work related to COVID-19 in 2021.

The public perception of CSOs, both urban and rural, remained positive in 2021. Communities see CSOs as primary partners in the development process of Timor-Leste, and as a bridge between them and the government. CSO engagement with communities on the ground and their accurate assessment of the most urgent needs significantly contributed to this positive perception in 2021, as did their rapid support in times of emergency. Because CSO activists have sometimes gone on to become politicians or are actively engaged with political parties, there is still some confusion among the public about CSO political affiliations; in 2021, however, this was limited, overshadowed by the significantly positive impact of CSO work.

Both the government and the private sector held positive perceptions of CSOs in 2021, especially as the sector continued to be an integral partner in responding to national crises. The government and National Parliament particularly turned to CSOs for critical information about needs on the ground and for assistance in meeting community needs without discrimination. Similarly, the private sector saw CSOs as important partners in distributing supplies and material goods to those in need, especially in response to the flooding and COVID-19. In 2020, the private sector had sometimes perceived CSOs as political activists or clashed with them on particular issues, but no such concerns arose in 2021 as both sectors worked together to provide much-needed relief services.

Most CSOs continued to promote their activities through the national media and their own websites, donor websites, e-mail, and on social media platforms like Facebook. CSOs continued to invite journalists to cover activities like publication releases, seminars, workshops, and meetings, but were often expected to provide payment for that coverage as sponsored content. The FONGTIL media center also actively promoted member activities.

The majority of CSOs have their own codes of ethics and policies on fraud, sexual abuse, and child protection; this is particularly true of FONGTIL members, which include a wide range of CSOs, while community-based organizations continue to lack the capacity for such internal development. Most CSOs continue to publish annual reports, which are then distributed to the organization's donors and published online or through a bulletin. FONGTIL members also present their reports at the annual assembly meeting.

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

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