Operational Guidelines on the preparation and implementation of EU financed actions specific to countering terrorism and violent extremism in third countries
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## CONTENTS

### INTRODUCTION
- About the Guidance ................................................................. 7
- Why a CT-P/CVE guidance? ....................................................... 7
- How to Use the Guidelines ......................................................... 8

### 1 CONCEPTS AND DEFINITIONS
- 1.1. Terrorism and violent extremism ........................................ 10
- 1.2. Radicalisation ....................................................................... 10
- 1.3. Counter-Terrorism ............................................................... 13
- 1.4. Preventing and Countering Violent Extremism (P/CVE) ......... 13
- 1.5. CT and P/CVE Mainstreaming ............................................ 14

### 2 THE EU, INTERNATIONAL PRINCIPLES AND STRATEGIC APPROACH
- 2.1. Main EU relevant policies ................................................... 15
- 2.2. Relevant EU Financial Instruments ...................................... 16
- 2.3. Key EU Principles .............................................................. 19

### 3 PRACTICAL GUIDELINES
- 3.1. Overview ............................................................................. 25
- 3.2. Programming ...................................................................... 26
- 3.3. Identification ....................................................................... 28
- 3.4. Formulation .......................................................................... 34
- 3.5. Implementation .................................................................... 44
- 3.6. Evaluation including Lessons Learned and Close Down .......... 50

### APPENDIX
- Lessons Learned and Close Down ............................................ 55
<table>
<thead>
<tr>
<th>AML</th>
<th>Anti Money Laundering</th>
</tr>
</thead>
<tbody>
<tr>
<td>CARIN</td>
<td>Camden Asset Recovery Inter-Agency Network</td>
</tr>
<tr>
<td>CASE</td>
<td>Civil Aviation Security</td>
</tr>
<tr>
<td>CBRN</td>
<td>Chemical, Biological, Radioactive and Nuclear</td>
</tr>
<tr>
<td>CEPOL</td>
<td>EU Agency for Law Enforcement Training</td>
</tr>
<tr>
<td>CFT</td>
<td>Combating the Financing of Terrorism</td>
</tr>
<tr>
<td>CII</td>
<td>Critical Information Infrastructure</td>
</tr>
<tr>
<td>CoE</td>
<td>Center of Excellence</td>
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<tr>
<td>COTER</td>
<td>Council Working Group on Terrorism</td>
</tr>
<tr>
<td>CSDP</td>
<td>The Common Security and Defence Policy</td>
</tr>
<tr>
<td>CSO</td>
<td>Civil Society Organisation</td>
</tr>
<tr>
<td>CSP</td>
<td>Country Strategy Paper</td>
</tr>
<tr>
<td>CSS</td>
<td>College Sahelien de Securite</td>
</tr>
<tr>
<td>CT</td>
<td>Counter-Terrorism</td>
</tr>
<tr>
<td>CT CAPRI</td>
<td>Counter-Terrorism Associated Prosecutorial Reform Initiative</td>
</tr>
<tr>
<td>CTF</td>
<td>Counter-Terrorism Finance</td>
</tr>
<tr>
<td>CT Sahel</td>
<td>Counter-Terrorism Sahel</td>
</tr>
<tr>
<td>DCI</td>
<td>Development Cooperation Instrument</td>
</tr>
<tr>
<td>EDF</td>
<td>European Development Fund</td>
</tr>
<tr>
<td>EEAS</td>
<td>European External Action Service</td>
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<tr>
<td>EIDHR</td>
<td>European Instrument for Democracy and Human Rights</td>
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<tr>
<td>EJN</td>
<td>European Judicial Network in Criminal Matters</td>
</tr>
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<td>ENI</td>
<td>European Neighbourhood Instrument</td>
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<tr>
<td>EUTF</td>
<td>European Union Trust Fund</td>
</tr>
<tr>
<td>DAC</td>
<td>Development Assistance Committee</td>
</tr>
<tr>
<td>DDR</td>
<td>Disarmament, Demobilization and Reintegration</td>
</tr>
<tr>
<td>DG-DEVCO</td>
<td>Directorate-General for International Cooperation and Development</td>
</tr>
<tr>
<td>DG-ECHO</td>
<td>Directorate-General for European Civil Protection and Humanitarian Aid Operations</td>
</tr>
<tr>
<td>DG-HOME</td>
<td>Directorate-General for Migration and Home Affairs</td>
</tr>
<tr>
<td>DG-JUST</td>
<td>Directorate-General for Justice and Consumers</td>
</tr>
<tr>
<td>DG-NEAR</td>
<td>Directorate-General for Neighbourhood and Enlargement Negotiations</td>
</tr>
<tr>
<td>EDF</td>
<td>European Development Fund</td>
</tr>
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<td>EU</td>
<td>European Union</td>
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<td>FATF</td>
<td>Financial Action Task Force</td>
</tr>
<tr>
<td>FIU</td>
<td>Financial Intelligent Unit</td>
</tr>
<tr>
<td>FGDs</td>
<td>Focus Group Discussions</td>
</tr>
<tr>
<td>FPI</td>
<td>Foreign Policy Instruments</td>
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FSRBs  | FATF-Style Regional Bodies
---|---
FTFs  | Foreign Terrorist Fighters
GCERF | Global Community Engagement and Resilience Fund
GCTF | Global Counter-Terrorism Forum
HoA  | Horn of Africa
ICG  | International Crisis Group
IcSP | Instrument contributing to Stability and Peace
IfS  | Instrument for Stability
IGAD | Inter-Governmental Authority for Development
IJJ  | International Institute for Justice
INTCEN | Intelligence and Situation Centre
KII | Key Informant Interviews
M&E | Monitoring and Evaluation
MENA | Middle East and North Africa
MoU  | Memorandum of Understanding
NGO | Non-Governmental Organisation
NPO | Non-Profit Organisation
ODA | Official Development Assistance
OECD | Office for Economic Cooperation and Development
P/CVE | Prevent/Counter Violent Extremism
PCM | Project Management Cycle
PoC | Point of Contact
RAN | Radicalisation Awareness Network
RBA | Rights-Based Approach
RIP/NIP | Regional/National Indicative Programme
RUSI | Royal United Services Institute
SEA | South East Asia
SOP | Standard Operating Procedures
SSD | Strategy for Security and Development
SSR | Security Sector Reform
STRIVE | Strengthening Resilience to Violent Extremism
TAIEX | Technical Assistance and Information Exchange Instrument
ToC | Theory of Change
UN | United Nations
UNCAC | United Nations Convention Against Corruption
UN CTED | United Nations Counterterrorism Executive Directorate
UNDP | United Nations Development Programme
UNSCR | United Nations Security Council Resolution
US | United States
USAID | United States Agency for International Development
VE | Violent Extremism
INTRODUCTION

The European Union (EU) recognises the need to address the threat of terrorism, and further develop cooperation within both its neighbourhood and external regions to prevent or counter violent extremism (P/CVE). The EU’s Counter-Terrorism (CT) Strategy comprises four pillars – Prevent, Protect, Pursue, Respond – designed to reduce terrorism globally, while respecting human rights. The ‘prevent’ pillar can be distinguished from the following three in that it focuses on non-coercive measures that seek to prevent or mitigate violent extremism. The remaining three pillars tend to focus on or coercive measures, such as those conducted by law enforcement or the military, as well as the activities of intelligence services, which usually work alongside or in support of law enforcement and the military. This reflects the fact that over time international policymakers have acknowledged that security measures alone cannot address the complex nature terrorism, especially in terms of reducing the “enabling environment” for violent extremism.

This is reflected in the 2016 UN Plan of Action for the Prevention of Violent Extremism, which goes beyond security-centric measures by introducing systemic, multi-tiered and synchronised steps to pre-emptively address conditions precipitating radicalisation and violent extremism.

About the Guidance

The Guidance is intended to provide a comprehensive practical framework on the EU’s external actions in the area of counter-terrorism (CT) and preventing and countering violent extremism (P/CVE). It offers practical support and operational guidance to EU staff on the design, implementation, monitoring and evaluation of EU financed CT and P/CVE specific interventions in third countries.

The guidance aims to provide the necessary expertise to:

• accurately assess vulnerabilities, factors contributing to, and manifestations of, terrorism and violent extremism in a specific country/region;

• assist in the design of appropriate, context specific and conflict sensitive project interventions for CT and P/CVE in third countries, drawing from international best practices and lessons learned;

• provide guidance on the monitoring of such programmes, including identifying potential positive and negative externalities for human security, governance, the rule of law, human rights and gender in the partner country;

• propose metrics and indicators for measuring the impact of CT and CVE programming across multiple result areas, including security, governance and development.

Why a CT-P/CVE guidance?

The EU believes there cannot be sustainable development without peace and security, and, vice versa, that without development and poverty eradication there will be no lasting peace.

This “nexus” between development and security should inform EU strategies and policies in order to contribute to the coherence of EU external action. In the last 15 years, there has been a gradual expansion of EU development and other cooperation policies into security-related areas such as counter-terrorism, and

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this is likely to grow still further. Therefore, the development of adequate operational guidance is required. Such a guidance would ensure that EU's development and security cooperation in these sensitive areas is cognisant to the risks of such an intervention, and can design appropriately targeted programmes that meet the objectives whilst mitigating risks, all of which should align with the EU's basic principles of human rights, democracy and the rule of law.

**How to Use the Guidelines**

The guidance is divided into three chapters and an appendix:

- Chapter 1 outlines CT and P/CVE concepts and definitions;
- Chapter 2 explain the EU's rationale and principles underpinning CT-P/CVE projects;
- Chapter 3 focuses on the practical implementation of CT-P/CVE programming;
- Complementary guidance and resources are available in the appendix section of this document, which includes information about who is who, related to CT in Brussels, checklist questions for each stage of the PCM and a bibliography.

This content is applicable to EU staff in both headquarters and delegations, and covers the entire project cycle – programming, identification, formulation, implementation (including monitoring and reporting), and evaluation. It should therefore provide a thorough grounding in the knowledge required for designing, delivering and evaluating CT-P/CVE projects and activities.

The guidelines should also be read in conjunction with its companion document, Operational Human Rights Guidance for EU External Cooperation Actions Addressing Terrorism, Organised Crime and Cybersecurity: Integrating the Rights-Based Approach (RBA).5

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CHAPTER 1

CONCEPTS AND DEFINITIONS

Terms associated with terrorism, including violent extremism and radicalisation are complex and controversial because of their political implications. The former United Nations Secretary General Ban Ki-moon acknowledged this difficulty in his Plan of Action to Prevent Violent Extremism (2016), which states at the outset that violent extremism (much like terrorism) is a ‘diverse phenomenon, without clear definition’.

The Plan of Action concedes that defining terrorism and violent extremism is “the prerogative of Member States and must be consistent with their obligations under international law, in particular international human rights law.”

The European Parliament acknowledges this challenge and has similarly stated that ‘the positions adopted by individual countries, regional and international organisations have resulted in a patchwork of approaches’. The EU has therefore circumvented this by shaping its policy approach in response to ‘terrorist offences’. What constitutes a terrorist offence has developed over time. A recent definition, provided by the Directive of the European Parliament and of the Council on combating terrorism, is:

“attacks against a person’s life, as intentional acts that can qualify as terrorist offences when and insofar as committed with a specific terrorist aim, namely to seriously intimidate a population, to unduly compel a government or an international organisation to perform or abstain from performing any act, or to seriously destabilise or destroy the fundamental political, constitutional, economic or social structures of a country or an international organisation.”

This latest directive builds on earlier delineations of terrorist offences. The Council of Europe Convention on the Prevention of Terrorism, adopted in 2005, criminalised ‘public provocation to commit a terrorist offence, and recruitment and training for terrorism’. An Additional Protocol was included in 2015, criminalising recruitment for terrorism, training for terrorism, travel to another state for purposes related to terrorism, and the provision or collection of funds for such travel. The 2017 directive expands these parameters further by criminalising both the organisation and facilitation of travel for the purpose of terrorism. It similarly adds the receipt of training to the existing offence of providing training including the obtaining of knowledge, documentation or practical skills to perpetrate terrorist acts. The boundaries of what constitutes ‘public provocation to commit a terrorist offence’ were also revised in the new directive to include the glorification and justification of terrorism through the online and/or offline dissemination of messages, and a series of additional crimes were identified as terrorist activities, for example: aggravated theft with a view to committing a terrorist offence, extortion with a view to committing a terrorist offence, and/or drawing up or using false administrative documents with a view to committing a terrorist offence.

In order to operate in the field it is important to have a clear and common understanding of the following concepts to use as a point of reference.

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1.1. Terrorism and violent extremism

Terrorism and violent extremism are very broad categories that are frequently aggregated with a range of ‘diverse phenomena, such as guerrilla movements, sectarian militias, and cell-based terrorist organisations’.\(^\text{13}\) While the two terms undoubtedly overlap and are often used interchangeably, they could be viewed as being categorically distinct, in that ‘terrorism’ potentially refers to acts – using violence to achieve an objective – while ‘violent extremism’ suggests aims and motivation. Others have suggested that ‘violent extremism’ is a broader concept that includes, but is not restricted to, terrorism.\(^\text{17}\) Given the lack of clear definitional consensus this guidance will aggregate ‘terrorism’ and ‘violent extremism’ for the sake of simplicity.

Terrorism and violent extremism are both generally understood to be violent in nature, politically or ideologically motivated, and aimed at the public and/or its representatives e.g. government officials.

1.2. Radicalisation

Radicalisation is also a contested term with various definitions. It is commonly understood as the social and psychological process of incremental commitment to violent extremist ideologies.\(^\text{15}\)

The most well-known radicalisation model is the ‘push-pull’ framework.\(^\text{16}\) ‘Push factors’ are identified as structural or environmental conditions that can create grievances prompting individuals to support violent extremism. ‘Pull factors’ are those which make violent extremist ideas and groups appealing or more proximate factors of violence.\(^\text{17}\) Despite the substantial appeal of this binary classification system, the framework risks neglecting factors driving radicalisation and/or recruitment, and by extension, overlooking opportunities to develop specific counter-measures. An alternate typology groups factors of violent extremism into four categories: structural motivations, enabling factors, groups and network dynamics, and individual incentives, providing greater scope for diagnostic nuance and precision.\(^\text{18}\)

**Typology of Factors of Radicalisation**\(^\text{19}\)

<table>
<thead>
<tr>
<th>Category</th>
<th>Examples</th>
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<tbody>
<tr>
<td><strong>Structural motivators</strong></td>
<td>repression, corruption, unemployment, inequality, discrimination, a history of hostility between identity groups, external state interventions in the affairs of other nations.</td>
</tr>
<tr>
<td><strong>Individual incentives</strong></td>
<td>a sense of purpose (generated through acting in accordance with perceived ideological tenets), adventure, belonging, acceptance, status, material enticements, fear of repercussions by violent extremist entities, expected rewards in the afterlife.</td>
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<tr>
<td><strong>Group Based Dynamics</strong></td>
<td>peer pressure, values and norms of groups that contribute and encourage recruitment, radicalisation and support for VE.</td>
</tr>
<tr>
<td><strong>Enabling factors</strong></td>
<td>the presence of ‘radical’ mentors (including religious leaders, individuals from social networks, etc.), access to ‘radical’ online communities, social networks with VE associations, access to weaponry or other relevant items, a comparative lack of state influence, an absence of familial support and so on.</td>
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\(^\text{15}\) Definition adapted from the European Union’s brochure, STRIVE for Development: Strengthening Resilience to Violence and Extremism (revised edition, 2016), for details of the EU’s P/CVE programming.


\(^\text{19}\) Adapted from James Khalil and Martine Zeuthen (2016) Countering Violent Extremism and Risk Reduction: A Guide to Programme Design and Evaluation, Whitehall Report, RUSI. This model is being used in a current EU programme, Strengthening Resilience to Violent Extremism (STRIVE II) in Kenya.
Creed versus grievance: the role of ideology
The degree to which ideological influences precipitate radicalisation, recruitment and terrorism continues to be contested across both policy and academic circles, particularly in terms of how far radical views translate into violent behaviour, or how far ‘extremism of thought’ becomes synonymous with ‘extremism of method’.\(^{20}\)

Ideology can be seen as a political belief system, an all-embracing political doctrine that claims a monopoly of trust, and an officially sanctioned set of ideas used to legitimise a political system or regime, to name a few associations. Even when the importance of ideology in violent extremism is conceded, many make the mistake of ignoring the social-historical context of the violent extremist/terrorist group and overlook how political ideas are moulded by the social, cultural and historical circumstances in which they develop. There is also a tendency to ascribe ideology as a prime motivation to all members of a group or movement when in fact the relative importance of ‘ideology’ may vary between leaders or rank-and-file members.

Scholarship has therefore challenged the notion that ideology plays either a causal role or could even be regarded as the most important factor in violent extremism and terrorism. Subscribing to radical ideologies is not necessarily a precondition to violence, and not all those engaged in violence are ideological fundamentalists. From a policy perspective this is important since it highlights that both policy-makers and programmers need to avoid the assumption that ‘ideological gateways’ invariably induce violent activity and that countering ideology will reduce the risk of violent extremism.\(^{21}\)

However, this does not imply that ideology possesses no analytical or programmatic relevance. Violent extremist groups are distinguishable from one another, and other forms of militancy, by the content of their message, the strategies they adopt and the goals they pursue, all of which are shaped and conditioned by ideology.\(^{22}\) Understanding ideology is therefore crucial for mapping the group’s aspirations (which cannot be divorced from political issues), the motivations for some (not all) individuals, and how the group recruits and mobilises followers in the service of both non-violent and violent action. It is also important to understand:

- **Content:** the texts violent extremists cite and the values they purport to represent.
- **Distribution:** how these ideas, beliefs and values are transmitted.
- **Identity:** at the heart of violent extremist ideology is a ‘description of an in-group based on race, religion or nationality and they provide a parallel description of an opposing out-group’.\(^{23}\) A movement becomes violent when the crisis affecting the in-group is blamed on the out-group and violence becomes the only perceived solution of resolving the crisis against the out-group.

For the content to resonate and to attract someone it must appeal at an emotional and affective level.\(^{24}\) There are numerous emotional reasons for being drawn to violence extremism that do not directly relate to intellectual causes or the purity of an idea, e.g. belonging, status, sense of adventure, revenge and searching for a meaning in life.\(^{25}\)


Religion and Ideology:
While violent extremism can stem from a multitude of sources – including secular ideologies such as nationalism, and Marxism or environmentalism – religion is often framed as a factor of violence and routinely conflated with ideology in public discourse, especially given the current focus on ‘Islamist’ violent extremism.

In reality, key factors of violent extremism are rarely those related to religion alone and research has consistently found that religious devotion can often be a source of resilience to violent extremism.\(^{26}\) The profile of European foreign fighters after 2013 reveals that a majority had a criminal background/experience with petty crime or were engaging in delinquency and experiencing a sustained sense of abandonment.\(^{27}\) Very few had even a basic understanding of Islam, let alone received any formal education from religious seminaries.\(^{28}\)

This is not to dismiss the importance of religion for violent extremists, particularly after they have joined a group or movement. For example, in the case of ‘Islamist’ violence, the ideological content is infused with religious ideas, backed up by texts and scholars. With respect to transmission, this primarily occurs through the Salafi-Jihadi movement, which has its own mosques, literature, charismatic individuals and transnational networks of people and groups. And in terms of identity, it has positioned itself relatively successfully as the active vanguard of the global Muslim community or ‘Ummah’. Groups like Al-Qaeda and ISIS claim to represent and defend all Muslims against Western aggression, as well as despotic rulers in Muslim majority countries, enabling them to recruit from the wider pool of the broader Muslim population. It is also important not to ignore the fact that many jihadists claim religion as a primary motivator for their action.

In the context of violent extremism religion can therefore be used in the following different ways:

1. As a source of collective identity and solidarity that aids in mobilisation.
2. To supply a narrative that helps to organise and give meaning to disaffection and grievance.
3. As a source of justification to legitimise violence.
4. As a means to imbue worldly conflict with a higher sacred purpose.\(^{29}\)

However, the point is that the significance of religion tends not to be as a factor of radicalisation i.e. a reason to join a group, but instead can retrospectively become a significant part of an individual’s identity after recruitment. It is also important to emphasise that self-sacrifice and devotional attachment to a cause is not exclusive to religious forms of violent extremism but can be found in secular movements including Marxist-Leninist groups such as the LTTE. You can easily substitute ‘religion’ with ‘nation’, ‘race’ or ‘Marxist utopia’ in the list above. Research suggests that sacred values (non-negotiable but not necessarily religious) are those that people are willing to die for. This is why individuals fight and die for religion but also for the tribe, the nation, the environment, animals, freedom, Communism, and so forth.

1.3. Counter-Terrorism

Counter-terrorism (CT) is the response mechanism of a state to the threat of politically or ideologically motivated violence. This includes measures taken to prevent, pursue, protect and respond to terrorism.\(^{30}\)

As counter-terrorism is broad and cross-sectoral it is important to differentiate between CT-specific and CT-relevant programming. CT-specific refers to programmes designed to address CT capacity gaps and deliberately counter terrorist actors and methods, for example; protecting critical infrastructure from terrorist attack, building the capacity of security services to effectively respond to terrorist attacks, or enhancing international and institutional cooperation to efficiently pursue and/or detain terrorist suspects. CT-relevant refers to actions that may have practical dividends for countering terrorism but which are not necessarily designed for this explicit purpose, including, for example, judicial capacity building, strengthening the penitentiary sector, and security sector reform (SSR).

1.4. Preventing and Countering Violent Extremism (P/CVE)

It has been acknowledged that there is a need for an increasing focus on preventive approaches to violence and conflict as a core component of CT in order to be successful over the long term. This is driven by recognition in recent years from both policymakers and practitioners that a holistic response is necessary to address the complex nature of VE.\(^{31}\)

Preventing and Countering Violent Extremism is a broad umbrella term to categorise activities that seek to prevent or mitigate VE through non-coercive measures that are united by the objective of counteracting the factors of violent extremism. While development organisations and practitioners have individual preferences for applying the terms ‘preventing violent extremism’ or ‘countering violent extremism’, there is often little difference in the specific objectives and actions on the ground between the two.

P/CVE is widely understood to include, for instance, community debates on sensitive topics, media messaging, inter-faith and intra-faith dialogues, training of state governance and security actors, and a variety of initiatives with individuals deemed to be ‘at risk’ of joining or being attracted to VE groups, such as vocational training and mentorship programmes. It therefore overlaps with efforts to prevent violence and conflict by supporting development, strengthening institutions, and developing appropriate policy frameworks.\(^{32}\)

P/CVE actions have sometimes been criticised for being based on unproven assumptions, and with concepts that are insufficiently clear. In practical terms, that means that P/CVE practitioners have struggled to draw clear boundaries between P/CVE programmes with those of other, well-established fields, such as development and poverty alleviation, peacebuilding, governance and democratisation, and education.\(^{33}\) Where P/CVE differs is in targeting sources of violence that originate in violent extremist groups, ideologies or movements. Recent research\(^{34}\) proposes that P/CVE initiatives include two main features:

1. They are designed to counter the critical factors of VE in the specific locations in which they occur, addressing relevant social networks, radical mentors, revenge seeking, the pursuit of status and a host of other motivating, enabling and structural factors.

2. Such efforts generally aim to target individuals specifically identified as ‘at risk of’, or ‘vulnerable’ to being drawn to violence to the extent feasible in any given location.


31 See a series of policy papers and toolkits on lone-actor terrorism, developed with funding from the EU’s Prevention of and Fight against Crime programme, at www.rusi.org/Projects/lone-actor-terrorism.


Given the wide range of activities that can potentially be included under the P/CVE umbrella, preventive programming can also be divided into ‘specific’ and ‘relevant’ categories to avoid conflating the term with any initiative that feasibly contributes to the broader socio-economic wellbeing of communities.

Therefore:

- An action being developed with P/CVE as its primary purpose is ‘CVE-specific’. This can involve a range of activities such as, for example, providing positive outlets for an at risk community whose young people have been identified through a needs assessment to be vulnerable to recruitment by violent extremists. On this basis CVE-specific programming requires the creation of new activities explicitly designed to address the factors and enabling conditions facilitating radicalisation and terrorist recruitment in a given context and will focus on ‘at risk’ or ‘vulnerable’ groups.

- It is also possible to adapt existing development or other programmes, either by adding a P/CVE dimension/activity or by tailoring the intervention to focus on a particular ‘at risk’ or ‘vulnerable group’. The programme is then aimed at addressing the factors of VE that have been identified and becomes ‘CVE-relevant’.

1.5. CT and P/CVE Mainstreaming

It is vital policy-makers and practitioners working in EU delegations and headquarters remain cognisant of the challenges and impact violent extremism can have in the context of development and security interventions. This should specifically involve considering whether it would be beneficial to incorporate CT and/or P/CVE-specific activities as sub-components within a broader package of deliverables. To this end, the Council of the European Union has called for an increased engagement in the field of CT and P/CVE at a national and global level, highlighting the need to revise existing CT-P/CVE strategies, policy frameworks and introduce a systematic mainstreaming of preventive work into political dialogues and assistance programmes. This includes taking advantage of the updated OCED guidelines certifying P/CVE funds and activities as eligible Official Development Assistance (ODA) (an in-depth analysis of the decision and its implications can be found on page 22). Particular attention should be focused on the role of women, youth, civil society, and local stakeholders, including religious and faith-based actors and community leaders, as viable agents of change.\[35\]

While these decisions are invariably context-dependent, the EU Council has similarly described the importance of mainstreaming CT-specific initiatives into justice programmes, particularly given the centrality of judicial systems in helping deter and mitigate terrorist atrocities. CT elements can also be incorporated into the EU’s political dialogue with third countries to promote international cooperation and implementation of relevant UN Security Council Resolutions.\[36\]

\[35\] Council Conclusions on EU External Action on Counter-Terrorism; General Secretariat of the Council, Council of the European Union, Brussels, 19 June 2017.

CHAPTER 2

THE EU, INTERNATIONAL PRINCIPLES AND STRATEGIC APPROACH

2.1. Main EU relevant policies

The EU has issued a number of policies and communications in response to the complexity of addressing terrorism and violent extremism which provide a platform for action.

In June 2016, the Global Strategy for the EU’s Foreign and Security Policy was presented as a new overarching foreign and security policy framework and reference document for the EU. The document identifies terrorism as one of the main threats facing the EU, and highlights the importance of further developing collaboration within the European neighbourhood and with other regions to counter and VE. The need for enhanced international cooperation, particularly in the Middle East and North Africa, was also emphasised in the European Council Conclusions of 9 February 2015 and further reinforced on 19 June 2017.

There have been several developments in the field of counter-terrorism over the past two decades, to strengthen the EU response in the face of attacks. In 2005, the EU launched its Counter-Terrorism Strategy, which comprises four essential pillars for reducing the risk from terrorism on a sustainable basis: Prevent, Pursue, Protect and Respond. Adopted by the Council of the EU in November 2005, this is the major statement of the EU’s policy and approach. Building on prescriptions outlined in the 2004 European Council Declaration on Combating Terrorism, which recommended heightening, enhancing and better integrating counter-terrorism objectives into external assistance programmes.

Figure 1: EU counter-terrorism strategy

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38 Council of the EU ‘Council Conclusions on Counter-Terrorism’ (10384/17), 19 June 2017.


EU Counter-Terrorism Strategy’s pillars

The Prevent pillar is designed to combat radicalisation and recruitment into terrorism. This also includes P/CVE measures. Under the ‘Prevent’ pillar the EU has been developing policy frameworks and implementation measures both inside the EU and worldwide. In 2016 P/CVE activities compromised more than half of the EU’s external assistance on CT, reflecting its significance in EU programming.

The Protect pillar aims to strengthen the defences of key targets, by reducing their vulnerability to attack, and also by reducing the impact of an attack. Although Member States have the primary responsibility for improving the protection of key targets, the interdependency of border security, transport and other cross-border infrastructures require effective EU collective action. This includes reducing the vulnerability of critical infrastructure to physical and electronic attack.

The Pursue pillar covers action to disrupt terrorist activity and pursue terrorists across borders. Objectives include impeding terrorist planning, disrupting networks and recruitment, cutting off resources to be used for attacks, and bringing terrorists to justice while continuing to respect human rights and international law.

The Respond pillar acknowledges that the EU needs to be able to respond to attacks when they occur, recognising that attacks can have effects across national borders. In the event of an incident with cross-border effects there will be a need for rapid sharing of operational and policy information, media coordination and mutual operational support, drawing on all available means, including military resources. EU crisis coordination arrangements, supported by operational procedures, help to ensure the coherence of the EU response to attacks.

The basis of the EU’s Prevent work is the EU Strategy for Combating Radicalisation and Recruitment to Terrorism⁴², which was most recently revised in 2014. The revised strategy approaches P/CVE in a comprehensive manner and identifies priority areas for EU action both internally and externally. These include the promotion of equal opportunities, community-level efforts, counter-narratives and capacity building. The Revised Strategy encourages collaboration between governments, communities, civil society, NGOs and the private sector. It calls for joint efforts at local, national, regional and international levels to support vulnerable countries in building the resilience of communities and countering terrorist-recruitment. The need for a comprehensive approach in preventing radicalisation to VE was also highlighted in the Communication from the European Commission of June 2016.⁴³ Moreover, the revised strategy encourages the EU to consider radicalisation – and to raise awareness of counter-radicalisation work – within its development programming.

2.2. Relevant EU Financial Instruments

As the scope of CT and P/CVE is wide, a range of financial tools are available to address particular dimensions of the problem, and can be loosely bifurcated between geographic and thematic programming. In order to more effectively address intertwined threats to peace and security, the EU has been under significant pressure to ensure that it carefully manages the allocation of Official Development Assistance (ODA), ensuring that clear distinctions and delineations are maintained to separate ODA from Other Official Flows (OOF) funding including those for counter-terrorism and P/CVE. Further information regarding ODA requirements for EU funding instruments are provided on page 22-23.

# Main EU financial instruments relevant to CT and P/CVE

<table>
<thead>
<tr>
<th>Instrument</th>
<th>Purpose</th>
<th>Coverage</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Geographical Instrument</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>European Development Fund (EDF)</strong></td>
<td>The EDF aims to stimulate economic development, social and human development, regional cooperation and integration.</td>
<td>79 African, Caribbean and Pacific partner countries of the Union and for the Overseas Countries and Territories of Member States</td>
</tr>
<tr>
<td><strong>Development Cooperation Instrument (DCI)</strong></td>
<td>The objectives and general principles of the DCI have been formulated in line with the Lisbon Treaty and the latest policies, notably the 'Agenda for Change' of EU development policy. Its prime objective is the reduction of poverty in partner countries. Besides the geographical dimension, the DCI is also the legal basis of two thematic programmes with global coverage, which aim to address different global challenges: Global Public Goods, Civil society organisations and local authorities. The Pan-African programme is also part of the DCI, covering the whole of Africa.</td>
<td>Partner countries in Latin America, Central, South and South East Asia, the Middle East and South Africa</td>
</tr>
<tr>
<td><strong>European Neighbourhood Instrument (ENI)</strong></td>
<td>The ENI covers the EU’s Eastern and Southern neighbours and, as one of six broad objectives, focuses on security by promoting confidence building and other measures contributing to security and the prevention and settlement of conflicts.</td>
<td>EU’s Eastern and Southern neighbours</td>
</tr>
<tr>
<td><strong>The Instrument for Pre-accession Assistance (IPA)</strong></td>
<td>IPA is the means by which the EU supports reforms in the ‘enlargement countries’ with financial and technical help. The IPA funds build up the capacities of the countries throughout the accession process, resulting in progressive, positive developments in the region.</td>
<td>EU Enlargement countries</td>
</tr>
<tr>
<td><strong>Thematic Instrument</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>The Instrument contributing to Stability and Peace (IcSP)</strong></td>
<td>The Instrument aims to guarantee security in stable countries and strengthen security in partner states experiencing on-going or emerging crises. It was established in 2014 to take over from the Instrument for Stability (IfS), and forms part of the Union’s new generation of instruments for financing external action, with a specific focus on crisis response, crisis preparedness, conflict prevention and peace-building. As its predecessor, the IcSP is not bound by ODA eligibility requirements.</td>
<td>Global</td>
</tr>
</tbody>
</table>

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45 Development Cooperation Instrument (DCI), International Cooperation and Building Partnerships for Change in Developing Countries, European Commission. Available at: www.ec.europa.eu/europeaid/how/finance/dci_en.htm.

46 European Neighbourhood Instrument (ENI), International Cooperation and Building Partnerships for Change in Developing Countries, European Commission. Available at: www.ec.europa.eu/europeaid/funding/funding-instruments-programming/funding-instruments_en.

In terms of added value, the IcSP addresses needs that cannot otherwise be tackled under any other instrument either because of (a) the urgency of the response, (b) the global or trans-regional nature of the problem, exceeding the scope of a geographic instrument; (c) the exclusion of the supported area from funding under ODA-bound instruments (e.g. counter-terrorism), or (d) the non-country specific nature of the assistance (e.g. projects to develop international standards or policies in the field of conflict prevention and peace-building).

<table>
<thead>
<tr>
<th>European Instrument for Democracy and Human Rights (EIDHR)</th>
<th>The EIDHR aims to help establish democracy, the rule of law and the protection of human rights and basic freedoms. This includes supporting the consolidation of civil societies and the strengthening of both international and regional human rights protection mechanisms.</th>
<th>Global</th>
</tr>
</thead>
<tbody>
<tr>
<td>The Partnership Instrument (PI)</td>
<td>The Partnership Instrument supports measures that respond in an effective and flexible manner to objectives arising from the Union’s bilateral, regional or multilateral relationships with third countries and shall address challenges of global concern and ensure an adequate follow-up to decisions taken at a multilateral level. The Instrument’s overall objective is to advance and promote EU interest by supporting the external dimension of EU internal policies (e.g. competiveness, research and innovation, migration) and by addressing major global challenges (e.g. energy security, climate change and environment).</td>
<td>Global</td>
</tr>
</tbody>
</table>

**EU Trust Funds (EUTF)**

EU Trust Funds have been established to deliver more flexible, swift, comprehensive and effective joint EU support in response to emergencies, fragility and other thematic priorities. Three Trust Funds have been created: the Bekou Trust Fund for the Central African Republic, the Regional Trust Fund for Syria (Madad Fund) and the Emergency Trust Fund for Africa. Their objective is to address the root causes of conflict and instability and assist conflict-affected countries and communities in the transition towards resilience and development. For more details on Trust Funds, see the annex.

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2.3. Key EU Principles

The EU programming in the area of CT and P/CVE should follow a number of key principles in order to coherently design and implement high quality interventions.

The Need for an Integrated CT-P/CVE Approach

The EU has long recognised the need to address the threat of terrorism at home and abroad, highlighting the importance of aligning CT and P/CVE activities within the European Neighbourhood with prevention efforts further afield across other regions, including North Africa and the Middle East. As such, the Union’s Global Strategy emphasises the need for an integrated approach capable of creating and exploiting synergies between internal activities (within the EU) and external aspects (overseas) of CT. CT and P/CVE programming is also multi-disciplinary and forms part of the broader security-oriented interventions conducted by the EU’s various instruments: notably in the field of security sector reform, initiatives strengthening judicial capacities and the rule of law, and human rights programming. All such external interventions normally refer to EU regional, country or thematic strategies where they exist.

The need for a comprehensive, integrated approach is also underlined in the EU Strategy for Combating Radicalisation and Recruitment to Terrorism. This identifies priority areas for EU action both internally and externally. These include: the promotion of security, justice and equal opportunities for all; enhancing government communications; supporting messages countering terrorism and presenting alternative pathways; countering online radicalisation and recruitment to terrorism; training, building capacity and engaging in first line practitioners across relevant sectors; supporting individuals and civil society to build resilience; supporting disengagement initiatives; supporting further research into the trends and challenges of radicalisation and recruitment to terrorism; and aligning internal and external counter-radicalisation work.

CT and P/CVE requires a ‘Whole of Society’ Approach

The EU Strategy for Combating Radicalisation and Recruitment to Terrorism (2014) encourages collaboration between governments, communities, civil society, NGOs and the private sector. The strategy calls for joint effort at local, regional, national and international levels to support vulnerable countries to counter terrorist-recruitment and build the resilience of communities to radicalisation.

Civil society and community actors are critical to the development of holistic, relevant and responsive P/CVE strategies that have resonance and sustainability with recipient groups. However, there has been a systemic shrinkage in the space for and autonomy of non-state actors in recent years within the field of P/CVE and across the political sphere more generally with a number of governments – both democratic and non-democratic – introducing restrictive laws limiting the operations of CSOs. While this trend exhibits different characteristics across different contexts, the rubric of counter-terrorism is often touted to legitimise legislation and security provisions curtailing or co-opting independent voices. These measures can be partially traced to an increasing desire on the part of states to control or regulate inflows of foreign funding. But the phenomenon also has many structural factors as diagnosed by the EU itself, linked to resurgent strains of authoritarianism and an emboldened anti-liberal social agenda.
The EU has reiterated its commitment to ameliorating the shrinking space for civil society, and the problem is on its way to being mainstreamed in the Union's foreign policy. It has also responded with a range of more specific policy mechanisms and instruments, including, the European Instrument for Democracy and Human Right (EIDHR)'s Emergency Fund for Human Rights Defenders and a series of new Civil Society Roadmaps. These dynamics do not specifically focus on either CT or P/CVE, but they nevertheless feed into a broader cluster of considerations practitioners need to make when designing and delivering EU affiliated programming.

Do No Harm and Do Maximum Good

CT-P/CVE interventions must respect the twin principles of Do No Harm and Do Maximum Good, by ensuring that project interventions do not cause human rights violations, exacerbate divisions between institutions and communities, and worsen existing grievances. However, it must be emphasised that CT or P/CVE programming inevitably entails a degree of risk that should be considered in the programming, identification, formulation and implementation phases.

P/CVE initiatives must also avoid the converse temptation of becoming overly risk-adverse as this will impinge on their ability to achieve their intended impacts. In particular, in an effort to enhance the effectiveness and efficiency of its activities, programmes may need to operate in relatively insecure environments, and to target those specifically deemed to be ‘at risk’. Given the sensitivities involved strict adherence to the principle of do no harm may lead to no action being taken. In this case, it may be more appropriate to adopt a ‘conflict sensitive’ approach, which aims to minimise harm.

As outlined the DCI Regulation (art 3.8) both CT and P/CVE programmes (alongside all other EU programming) should subscribe to a rights-based approach, encompassing all human rights and a series of precepts including non-discrimination, accountability, the indivisibility and universality of individual rights, and, where feasible, transparency (see Communications Strategy: Information and Visibility on page 49 for details).

Rule of Law Based Approach to CT and P/CVE

The EU promotes a rule-of-law-based approach to terrorism, which emphasises the importance of treating terrorism primarily as a criminal matter.

Turning this approach into practice, both within and outside the EU, requires extensive legal, strategic and capacity-building efforts focused on actors within the criminal justice system ranging from police to prison officials.

A systemic approach is essential for three reasons. Firstly, a failure to prosecute individuals effectively means that violent extremists remain within society, free to incite or commit violent acts. Secondly, a failure to manage individuals in detention appropriately means that violent extremists can radicalise other detainees. Thirdly, a failure to deport a foreign terrorist fighter (FTF) in a controlled way, which requires cross-border cooperation, means that they can radicalise others in their country of residence or country of origin.

57 Khalil and Zeuthen (2016).
59 Further details provided in the companion document to these guidelines: the EU’s Operational Human Rights Guidance for EU external cooperation actions addressing Terrorism, Organised Crime and Cybersecurity: Integrating the Rights-Based Approach (RBA).
Negative experiences with law enforcement and other state officials can be counter-productive, and perceptions can often be as important as reality. Violations of human rights, discrimination and repression by government agencies, sometimes in the name of fighting terrorism, can fuel the very conditions conducive to the spread of violent extremism. Hence, it is essential for authorities to respect human rights, promote the social, political and economic well-being of their citizens, and to design effective P/CVE interventions to diminish the appeal of violent political activism. The authorities also need to communicate effectively with citizens as increasing opportunities to create positive relationships between governments, law enforcement officials and communities through, for example, community policing, can build resilience against terrorist and VE groups.

Rule of law activities can also contribute to deradicalisation and disengagement programming, or rehabilitation for detainees and/or former combatants.

The EU has introduced a series of region-specific interventions under the auspices of the European External Action Service (EEAS), implementing conventional development and security sector reform (SSR) programme with integrated CT and P/CVE components integrated into the overall programme.

The Strategy for Security and Development in the Sahel (SSD) strengthens political stability, good governance and social cohesion by improving communal relations with their respective states, and access to basic services, education and economic opportunities. However, the scheme is also designed to: strengthen border security; support the implementation of peace settlements; tackle corruption; and train local elites to ‘better understand and react to the threats of terrorism and organised crime’. Focusing on Mali, Mauritania and Niger, the SSD aims to achieve a package of complementary outcomes that synthesise specific P/CVE and CT measures within a wider framework of development, conflict resolution, diplomatic and security sector reforms.

Similar initiatives also include the Strategic Framework for the Horn of Africa, which promotes engagement between the EU and countries in East Africa. It incorporates diverse but overlapping actions that tie capacity building and counter-radicalisation into a broader system of commercial, economic and diplomatic interventions.

CT, P/CVE and Development

Fragile states, weak governance and social, economic and political grievances can provide space for violent extremists and fertile ground for recruitment and radicalisation.

Armed conflicts also provide images and narratives that can be used to radicalise while conflicts provide the space in which violent extremism can arise. P/CVE, and the stabilising impact that building resilience to VE can have, is therefore relevant to improving the delivery of EU assistance and development aid in vulnerable countries.

The EU has explicitly recognised the interdependency and underlying nexus between sustainable development, humanitarian action, peace and security, and many of its programmes promote shared solutions to violence and instability, including by supporting the democratic governance of the security sector, its effectiveness


61 This includes the membership of the Inter-Governmental Authority for Development (IGAD) – Djibouti, Eritrea, Ethiopia, Kenya, Somalia, Sudan, South Sudan and Uganda.

62 Council Conclusions on Enhancing the Links between Internal and External Aspects of Counter-Terrorism, 3095th Justice and Home Affairs Council Meeting, Council of the European Union, Luxembourg, 1 and 10 June 2011.

63 See the European Union’s brochure, STRIVE for Development: Strengthening Resilience to Violence and Extremism (revised edition, 2016), for details of the EU’s P/CVE programming.
in providing human security, and capacity building. This synergy is also recognised and reflected in the UN’s Sustainable Development Goal (SDG) 16 on peace and security, which states that the international community should:

‘promote peaceful and inclusive societies for sustainable development’ and ‘strengthen relevant national institutions, including through international cooperation, for building capacity at all levels, in particular in developing countries, to prevent violence and combat terrorism and crime.’

The EU’s development projects cover several thematic areas some of which are relevant to P/CVE: development of education, media awareness, empowerment of women, youth work, socio-economic inclusion, transitional justice, and inter-communal activities including sport and both inter-faith and intra-faith dialogue. Similarly, judicial and government capacity building schemes are critical for CT. While the majority of the EU’s development projects are not specifically focused on CT-P/CVE, programmes or projects can be adapted to make them P/CVE- and/or CT-relevant. Many of the objectives and achievements in the areas outlined above, especially in the realms of development, education, civic rights and political activism, are threatened by extremist agendas.

P/CVE and ODA

In February 2016 the Organisation for Economic Co-operation and Development (OECD) updated its guidelines for determining how development aid can be used and officially recorded. Influenced by evidence that violence is negatively affecting development assistance, the OECD determined that certain activities undertaken for the purpose of P/CVE are now eligible as Official Development Assistance (ODA). P/CVE was previously viewed in the same category as counter-terrorism by the OECD and therefore ineligible as ODA. By allowing some P/CVE activities to be included under the ODA category and thus clearly linked to development, the OECD has signalled a fundamental conceptual shift with profound implications for funders and recipients.

The revision allows the allocation of additional resources for prevention initiatives ‘under thematic and geographic instruments where ODA-eligibility is a requirement’. CT-specific training schemes and intelligence cooperation remain excluded from ODA under DAC guidelines.

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66 See the European Union’s brochure, STRIVE for Development: Strengthening Resilience to Violence and Extremism (revised edition, 2016), for details of the EU’s P/CVE programming.

Eligibility rules for PVE activities

Financing activities combating terrorism is generally excluded from ODA. For example, kinetic activities and the use of force, and support for armed response or combat operations, whether by military or civilian police, are excluded. In the spirit of the recommendations of the 2016 UNSG Plan of Action to Prevent Violent Extremism, activities preventing violent extremism in developing countries are reportable as ODA as long as they are led by partner countries and their primary purpose is developmental. Activities targeting perceived threats to the donor country rather than focusing on the economic and social development of the partner countries, are excluded (e.g. the protection of developed countries’ nationals not engaged in humanitarian or development activities).

Eligible activities include:

• Education.
• Activities that support the rule of law.
• Working with civil society groups specifically to prevent radicalisation, support reintegration and deradicalisation, and promote community engagement.
• Building the capacity of security and justice systems in specific skills required for the prevention of extremist or terrorist threats, such as in the collection and correct use of evidence or fair trial conduct, to ensure more effective and human rights-compliant behaviours.
• Research into positive alternatives to address causes of violent extremism in developing countries.

International Collaboration

The adoption of the UN Global Counterterrorism Strategy in 2006 reflects the global consensus on addressing the issue of terrorism. Drawing on existing international protocols, the Strategy is notable for urging states to focus on four complementary and mutually reinforcing pillars: addressing the conditions conducive to the spread of terrorism, preventing and combatting terrorism, building states’ capacity and strengthening the role of the UN, and ensuring human rights and the rule of law.

Key UN Security Council Resolutions underpinning this multilateral CT strategy include:

• Resolution 1373 on terrorist finance: criminalises financing of terrorism and associated money laundering; contains measures on freezing and confiscation of terrorist assets; and makes recommendations on the control of cross-border movement of money.
• Resolution 1624 on incitement to terrorism: prohibits incitement to commit a terrorist act; and calls for states to strengthen border security and to enhance dialogue between civilisations.
• Resolution 2178 on foreign terrorist fighters (FTF): reaffirms the need for effective border control (including prevention of the fraudulent use of identity papers, screening procedures, analysis of travel data); intensifies information exchange; prevents of radicalisation/P/CVE, recruitment, financing and travel by FTF; and advocates the importance of prosecution, rehabilitation and reintegration strategies.

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In 2016 the UN also launched a Plan of Action to Prevent Violent Extremism. This goes beyond security-centric measures by introducing systemic, multi-tiered and synchronised steps to pre-emptively address conditions precipitating radicalisation and violent extremism. There are seven priority areas for action, which are:

- Dialogue and conflict prevention.
- Strengthening good governance, human rights and the rule of law.
- Engaging communities.
- Empowering youth.
- Gender equality and empowering women.
- Education, skill development and employment facilitation.
- Strategic communications, the internet, and social media.

For maximum effect, EU policy, strategy and actions have been aligned with international norms, particularly UN resolutions, and the EU works with other international organisations and forums such as the Global Counter-Terrorism Forum (GCTF) to deliver a common approach and impact.
CHAPTER 3

PRACTICAL GUIDELINES

3.1. Overview

**CT-P/CVE programme**
A successful CT-P/CVE programme should begin with an accurate and clear statement of need. It should be well designed to meet objectives arising out of the identified needs and should be implemented in a sensitive and focused manner. Evaluation of progress and achievements needs to be included into the programme from the outset and, at the end of the programme, a follow up assessment should be carried out to learn lessons.

CT and P/CVE programmes and projects require specific consideration and approaches. The following sections will therefore provide orientation and advice on how to integrate CT or P/CVE principles, approaches and tools at all stages of the EU Project Management Cycle (PCM).

Figure 2: PCM Cycle of Operations.\(^\text{74}\)

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3.2. Programming

A summary of key objectives, inputs, tasks and outputs of the programming stage is presented in the box below. This can be used as a checklist of the key aspects to consider at each stage.

**Objectives for programming**
- To establish the need for EU support to CT or P/CVE activities at regional or country level.
- To identify the strategic EU approach to CT and P/CVE at regional or country level.

**Input of programming**
- National and regional development plans.
- Current EU development policy and international agenda.
- Current EU CT and P/CVE policies.  
- Partner government CT and P/CVE strategies and policies.
- Other relevant analyses and related documents published by organisations such as UNDP, Counter-Terrorism Committee Executive Directorate (CTED), International Crisis Group (ICG).

**Tasks for programming**
- Assess the security situation.
- Assess the human rights situation including in relation to women’s rights.
- Review CT-P/CVE approach and relevant policies in the region and/or country.
- Inquire about the interest/relevance for supporting CT-P/CVE in the region and/or country among the government and broader society.
- Draw on the expertise of EU CT/Security experts to provide guidance about the suitability and feasibility of a P/CVE project.
- Organise consultation workshops, if appropriate.
- Engage in policy dialogue with partner countries or regions.

**Output from programming**
- Decision about the relevance of a sector or a programme in CT and P/CVE area.
- Strategic choices (objectives) and priority areas in CT and P/CVE.
- Support for CT-P/CVE in RIP/NIP consistent with regional and/or country policies, plans and priorities.
- Agreement to begin identification of CT-P/CVE projects.

In the context of traditional EU development cooperation (e.g. EDF and DCI), the purpose of the programming stage is to assess whether, and in what form, counter-terrorism and P/CVE should be considered as priorities for EU engagement in a specific country or region. This decision must be based on decision-makers providing and planning for financial assistance in the field of CT-P/CVE. A strategic approach is required to ensure the most effective use of limited resources to attain the optimal impact. This cannot be done unless a number of conditions are met in terms of knowledge and information.

Regardless of the cooperation instrument used, during the programming phase a broad country-level analysis of the current needs and policies in a country or region should be conducted in order to identify opportunities for EC support and to achieve a coherent and effective approach in the chosen area of support.

This is the initial step to make sure that the possible impact and benefit of EC cooperation in counter-terrorism and preventing/countering violent extremism is recognised in the specific region or country concerned. The agreement for cooperation achieved during programming provides a framework and the basis of support to enable CT-P/CVE projects to be identified in the next stage of the PCM.

Under the traditional financial instruments (e.g. EDF and DCI) it is unlikely that the programming stage will identify CT or P/CVE as a specific priority of cooperation. Rather, these elements will be included under, for example, broader rule of law, or SSR themes or for P/CVE actions under education/health/employment priorities.

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There are other financial instruments where the work in the area of CT and P/CVE appears more straightforward because of their specific nature and purposes, like the IcSP and the recently created Trust funds (please refer to chapter 2, page 19).

However, regardless of the financial instrument used, the strategic choice of whether to engage in CT or P/CVE must be based on a preliminary analysis of the situation, the threat from violent extremism and the current ability of the government – including security and justice institutions – to respond to the threat.

Programming in the area of CT-P/CVE is often complex and politically sensitive since security is usually seen primarily as a national/government responsibility. Several aspects therefore need to be taken into account.

### Human Rights

During the programming stage, and before deciding to proceed to the identification stage, it is important to consider any risks associated with the human rights situation. EU staff should assess all the risks that could negatively impact on the exercise of human rights through CT-P/CVE programmes and integrate human rights concerns at each stage of the PCM. It is then essential to work out which risks can be mitigated, which risks can be tolerated, and which risks are too high to justify involvement.

The European Commission has published a comprehensive practical framework on how to incorporate human rights safeguards in the design, implementation, monitoring and evaluation of EU actions in the area of counter-terrorism: Operational Human Rights Guidance for EU external cooperation actions addressing Terrorism, Organised Crime and Cybersecurity: Integrating the Rights-Based Approach (RBA).

The human rights dimension is particularly important to consider in relation to CT, which aims to build the capacity of the government and relevant institutions. Overly aggressive security measures can create grievances that can increase violent extremism. CT projects that respond to the threat of terrorism may affect fundamental rights such as the freedom of expression, freedom of movement, the rights to life and to privacy, or fair trial rights. For example, support to intelligence gathering capacities to fight terrorism, which serves to protect the rights of victims of such crimes, and society in general, risks having highly disproportionate impacts on other rights in contexts where the rule of law and fair trial rights are not respected.

P/CVE projects can also potentially affect fundamental rights, for example if the government misuses P/CVE strategies and policies to clamp down on political opposition by labelling it as extremism. For this reason, it is important to focus on countering or preventing violent extremism rather than other forms of extremism. This is also important in the development of national CVE strategies, a requirement set out in the UN Plan of Action.

In assessing the human rights context, it is therefore important to look at a government’s current strategies, policies and approaches to CT-P/CVE, how they are being implemented, and what impact that is having on human rights. It is important to respond to security threats whilst upholding commitments to the global principles of human rights, civil liberties and the rule of law.

### Security Situation

Attention should be paid to the feasibility of implementing programmes in insecure and conflict-affected environments. Conflict-affected environments where violent extremist groups are active and widespread pose particular challenges to CT and P/CVE projects.

Conflict can also mean that the military, the police and other security institutions are conducting operations focused on challenging or even eliminating VE militant groups. The priorities of the national government could therefore undermine or conflict with CT or P/CVE activities.

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**Government and Civil Society Support**

Government support, at both a national and local level, for the EU’s engagement in both CT and P/CVE is particularly important given the sensitivities related to security. CT-P/CVE programmes and projects can also involve partners that go beyond traditional development actors (e.g. security and intelligence services). Experience shows that government support and the cooperation of local and municipal authorities will need to be included from the outset. If the partner country is not willing to allow CT-P/CVE activities this should be taken seriously into account before launching an initiative. In CT projects, the government (including security and justice professionals and institutions) are normally the direct beneficiaries, so their engagement and an assessment of their existing capacity is particularly important.

Many P/CVE activities place a heavy emphasis on engaging with non-state actors/civil society organisations including Women’s Organisations, many of whom have been working on P/CVE-related issues for a long time. A government that is obstructive to P/CVE activities focused on engaging civil society at a local and/or national level can also undermine project success from the outset. Meanwhile, options for engagement may be more limited in the absence of an active civil society.

*Finding out whether the government is involved in international fora such as the Global Counter Terrorism Forum (GCTF), and the Financial Action Task Force (FATF) could indicate their willingness to engage in this area. Government actors should in most cases be consulted separately from other societal actors.*

**Policy Dialogue**

Given the need for government support, political dialogue and policy dialogue conducted between the EU and national or regional partners in the governance, justice and security sectors constitute an essential component of EU development cooperation. Policy dialogue should occur at each stage of the Project Cycle Management. Policy dialogue on terrorism and violent extremism can be conducted through both formal and informal channels, at the highest technical level, with the cooperation of special advisers (rule of law, human rights and gender focal points, CT/Security experts).

At this stage, policy dialogue with state authorities should focus on the political, economic, social and cultural factors necessary for the development of CT-P/CVE plans and their conformity with countries’ national and international CT-P/CVE legislation, strategies and human rights obligations. Underlying patterns and causes of discrimination, violations, exclusion or any other rights abuses should be openly discussed with project partners, to jointly identify the conditions leading to the challenges observed and the critical capacity gaps existing to address these problems.

*The aim of this policy dialogue is to reach a common understanding of the issues at stake from the outset before deciding to launch a CT-P/CVE programme.*

### 3.3. Identification

The project identification phase focuses on a needs analysis and assessment of the context in which the CT-P/CVE project will be implemented in order to define strategic objectives and priority areas.

A summary of objectives, inputs, tasks and outputs of the programming stage is presented in the box below. This can be used as a checklist of the main aspects to consider at this stage.
Objectives for identification:

- To identify the CT-P/CVE needs of the context to understand the factors of VE and the government capacity to respond to the threat.

Inputs of identification

- Regional and National Indicative Programmes.
- Documentation and reports from EU institutions, media reporting, analysis and reporting by NGOs, research institutes and the UN.
- Field research on the factors of violent extremism and any additional research on capacity or institutional gaps in relation to CT.

Tasks for the identification

- Continue policy dialogue with the government and key stakeholders in regards to CT-P/CVE concerns.
- Conduct a needs assessment including a context analysis, mapping of CT-P/CVE work and identification of key stakeholders.
- Ensure consultation with key stakeholders. This could include:
  - National government departments or regional and local government agencies particularly ministries of interior/justice;
  - Local government and municipal authorities;
  - Law enforcement agencies, intelligence agencies, prisons and probation services;
  - Critical infrastructure organisations (public and private sector);
  - Civil society organisations and actors including religious or faith based actors, relevant community based groups, women’s, victims’ and youth groups;
  - Relevant international, national and local development organisations.
  - EU CT/Security experts.
  - Relevant international and national security organisations.
- Prepare and submit identification fiche / financing proposal.

Output from identification

- Initial Action Document.
- Results of needs assessment identifying CT-P/CVE project focus areas.
- Agreement amongst key donors, agencies and actors on EC supported CT-P/CVE project areas.
- Theory of change for proposed activity.

Conflict Sensitive Approach (CSA)

Terrorism and violent extremism is often (though not always) shaped, informed and driven by conflict. Particular care should be taken, however, in conflict contexts. Interventions that inject new variables, resources or transform decision-making processes will inevitably have an impact on peace and conflict dynamics, disrupting or challenging existing power relations, engendering competition, and potentially creating new divisions in recipient countries. It is therefore essential for CT-P/CVE programmes to adopt a conflict-sensitive approach; developing a comprehensive, granular understanding of the environments in which they are operating – especially underlying the conflict dynamics – the nature of their engagement, and how interventions both interact with, and affect, violent contexts. By doing so, CT-P/CVE activities can avoid reinforcing conflict trends and capitalise on opportunities to support peace, playing an important role in protecting vulnerable communities, promoting women’s rights, preventing further violence and promoting just and lasting peace. They can encourage existing or potential members of violent groups to find constructive ways to redress grievances, for example by encouraging open debate while challenging intolerant narratives. Crucially, conflict sensitive CT-P/CVE projects are compatible with, and can actively complement, broader peace-building strategies and objectives, delivering a more holistic and sustainable approach to tackling instability. The EU has available guidance (called ‘Addressing Conflict Prevention, Peace-Building and Security

77 There are a diverse spectrum of religious stakeholders not limited to the formal leadership, which may in reality not always represent the best placed or most authoritative outlet for engaging in preventative programming. Other influential actors should be considering including informal leaders, faith-based organisations (FBOs) and various women, youth and minority demographics within existing religious communities. The complexity of partnering with religious actors and institutions is further detailed on page 46.

Issues Under External Cooperation Instruments: Guidance Note on how and why conflict sensitivity should be incorporated into programme design and delivery.

Context Analysis

Interventions require a sound analysis of the situation within which responses are to be developed, including the local, national and regional factors contributing to terrorism and VE. This will also require mapping of stakeholders affected by CT-P/CVE issues and those responsible for them, as well as a capacity or institutional gap analysis, and an assessment of other CT or P/CVE focused programmes.

An analysis should include:

1. **A context analysis and threat assessment** – leading to a profile of terrorist groups and violent extremist-prone areas, taking into account any political, economic, security and environmental issues at the local, national and regional levels. The threat assessment should address the intention and capabilities of terrorist and violent extremist groups. This should also pay particular attention to the impact of terrorism and VE on gender and human rights.

2. **An analysis of the causes and responses.**
   a. P/CVE: An analysis of the (possible) causes and dynamics of VE and radicalisation - distinguishing between structural factors, individual, group and enabling factors (outlined in Chapter 1). Analysis of VE causes should also be complemented by an analysis of factors providing resilience to violent extremism. Gender should also be considered in exploring how radicalisation processes and dynamics affect both men and women.
   b. CT: An analysis gauging the effectiveness of counter measures and security responses. This might include the capacity to protect critical infrastructure, to respond to terrorist attacks, or legislation to bring terrorists to justice, or institutional capacities for international CT cooperation.

3. **An analysis of CT and P/CVE stakeholders** – exploring their interests, goals, positions, capacities and relationships; this should include a capacity or institutional gap analysis of key government institutions.

4. **An outline of potential scenarios**
   a. P/CVE: Analyse possible changes in radicalisation/recruitment trends and the constellation of factors potentially precipitating violent extremism and reflect on the role of gender in these.
   b. CT: Assess potential developments in the capabilities of VE groups, such as innovations in terrorist technology and/or methods and shifts in counter-terrorist responses, for example technological advances, evolving counter-measures and changes in the degree of institutional cooperation.

5. **The identification of existing and planned responses to radicalisation and terrorist threats, internal and external** – taking into account all aspects, including development, military and security, diplomatic and migration.

6. **The identification of the main gaps, options and realistic strategies to respond to terrorism and VE**, being mindful of the risk that a poorly conceived or executed intervention might inadvertently increase the threat of terrorism or vulnerability of some groups to radicalisation. This also needs to pay particular attention to the potential impact of strategies on gender and human rights dynamics.

The context analysis in relation to CT requires not only assessing violent extremist and terrorist threats but should also concentrate on verifying state capacity to deal with these threats. The analysis in relation to P/CVE should be focused on the factors of VE and resilience.

It is important that any factors or conditions that could adversely affect results are identified and analysed (e.g. political governance, macroeconomic stability, public financial management, corruption, natural resource depletion, environmental degradation, and climate risks etc.).

An analysis of the political context is particularly important. As noted, governments may not always be supportive of external engagement in CT-P/CVE activities and could create particular challenges to activities in this area. Similarly, there is a risk, in certain cases, that explicit collaboration between governments and non-state partners, such as civil society organisations, may result in the stigmatisation of these actors by the...
communities in which they operate. It will be important to consult with government and non-governmental stakeholders on the political sensitivities. Regional dynamics and political, cultural, and socioeconomic forces should also be taken into account.

The assessment needs to take into account the underlying ‘factors’ of the problem in a certain country and the government’s capacity to respond to these. In some cases it will also be advisable to determine intracountry variation of VE factors in order to identify the most vulnerable communities and opportunities for engagement in P/CVE activities and to identify the government’s capacity in this area for CT projects. Direct causal linkages are often difficult to ascertain, and VE is rarely the product of a single factor, so identifying these drivers will probably require research (a suggested approach is outlined below). It is important to take into account social or political factors that do not directly contribute to the terrorist threat, but create a permissive environment for extremist groups. Identifying the factors of terrorism and VE will therefore require an understanding of the structural, individual, group and enabling factors (as outlined in chapter 1).

Gender should also be considered in exploring how radicalisation processes and dynamics affect both men and women. The factors fuelling radicalisation may affect men and women differently, for example, research in some countries suggests that women are more at danger of radicalisation in the private space, particularly online, than men who are more at risk on the streets or in the public sphere. Meanwhile, men and women may have different motivations, Marc Sageman notes, for example, that jihadi groups offer young men a particular high status brand of masculinity – fighters are the ‘rock stars’ of militant Islam. Organisational factors also strongly influence both male and female recruitment. Militant organisations need male fighters and authorities recognise this. Women may, however, be recruited due to this assumption, which often makes them better able to carry out attacks or transport weapons undetected.

A deep knowledge of local, national and regional issues is necessary to develop a context-specific needs assessment. It is important to consult relevant EU institutions, media reporting, reports and analysis by civil society organisations, think tanks, research institutes and the UN among others. It is also important to consult with local practitioners who are often better placed to identify key target audiences and provide contextual background on the factors and manifestations of VE, terrorism and the state’s capacity to respond. Local participation can result in more ‘organic’ CT-P/CVE initiatives that draw on local traditions and actors to enhance the relevance of the content. Where possible, local audience members should be encouraged to design and develop P/CVE content that resonates with their concerns and their communities. Field research will also likely be needed to identify the factors of VE. This analysis will influence how programmes and funding modalities are designed and decided.

**Mapping of Stakeholders**

An important part of the identification phase is to map all stakeholders that that can potentially be included in the process as partners, target groups and beneficiaries. This builds on the identification of stakeholders in the programming stage. This has to take into account the reasons why the act, their objectives, the scope and impact of their actions and the strategic choices in terms of targets, capabilities, communications and support structures. This applies to VE and terrorist groups but also to the public and the government response, including an institutional capacity analysis. Liaising with CT/Security experts working with EU Delegations (EUDs) are a critical resource in effectively mapping stakeholders and existing programmes as they will be able to share granular, context specific knowledge, specialist information and diagnostics on where the gaps are in the CT-P/CVE landscape.

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CT-P/CVE stakeholders can include:

<table>
<thead>
<tr>
<th>For both CT (pursue) and P/CVE:</th>
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<tbody>
<tr>
<td>• National government departments or regional and local government agencies particularly ministries of interior/justice.</td>
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<tr>
<td>• Law enforcement agencies, intelligence agencies and financial investigation units.</td>
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<tr>
<td>• Prisons and probation services.</td>
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<td>• Local government and municipal authorities.</td>
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<td>• Judiciary and prosecutors.</td>
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<tr>
<td>• Armed Forces.</td>
</tr>
<tr>
<td>• Independent Civil Society Organisations (CSOs)/Non-Governmental Organisations (NGOs).</td>
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<tr>
<td>• (Independent) National Human Right Institutions (NHRIs).</td>
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<tr>
<td>• Religious or faith based actors, relevant community based groups, women’s, victims and youth groups.</td>
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<tr>
<td>• Activists, human rights defenders and influential communicators.</td>
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<table>
<thead>
<tr>
<th>For CT (protect and respond):</th>
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</thead>
<tbody>
<tr>
<td>• Critical infrastructure organisations (public and private sector) including but not limited to transport, energy, communications, banking and finance, health etc..</td>
</tr>
<tr>
<td>• Transport security agencies.</td>
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<tr>
<td>• Emergency services and hospitals.</td>
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</table>

These actors should be encouraged to coordinate and cooperate in their activities, operating in concert across the state-citizen divide to best leverage available synergies and maximise comparative advantages.

Mapping of CT-P/CVE Activities
Another important aspect of the identification is the mapping of CT or P/CVE activities in the country. It is important to map what has been done before to identify existing and past programmes. This includes:

1. Identifying and assessing the relevance of past, ongoing or planned initiatives in the field, whether by public authorities at state, regional and local levels; civil society; academia; international/regional/sub-regional organisations; or bilateral assistance projects;

2. Identifying main lessons learned in the country, drawing also on relevant lessons from related fields like security sector reform, rule of law, development, education, communications and community engagement.

This can be done through a desk-based research study supplemented through field research if necessary. The mapping will allow for synergies to develop with successful interventions and prevent duplication of activities in what can often be a crowded field. To ensure maximum impact, a CT-P/CVE project should support other existing or planned initiatives and build on lessons learned from previous projects.

Intervention Rationale or Theory of Change (ToC)
At this stage, a theory of change should be developed based on the factors and capacity gaps identified. This is a hypothesis of why and how it is believed the proposed programme will address the specific factors and threats identified. ToCs aim to articulate the intended pathways from inputs/activities to the desired programme impact and to identify the main assumptions associated with these pathways and therefore any aspects of the design that may be problematic. ToCs often take a project's goal as the starting point and work backwards to articulate how and why the practices will lead to the goal. This type of model specifies assumptions, context and the order of activities.

A ToC is a hierarchy. At the top are the impacts – the long-term effects produced by an intervention. Feeding into the impacts are the outcomes – the short- to medium-term effects and changes produced by the intervention. Feeding into the outcomes are the intervention’s outputs – the products created by the

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intervention. The outputs are created as a result of the activities of the implementers and the inputs (i.e. resources) that they are able to command.

It is important to note that not all CT-P/CVE projects have a ToC. However, it is increasingly recognised as a valuable tool in programming, particularly for both monitoring and evaluation, and as a framework for understanding the ‘change processes’ that can then be used as a decision-making and adaptive management instrument. The ToC can organically evolve throughout the project life cycle, being revisited, revised and updated by practitioners, partners and other stakeholders to reflect changes in real time. This can provide a useful discussion and decision-making tool to ensure the aims of the intervention are coherent, and the various assumptions underpinning its modalities and programmatic logic are robust.

An example ToC from the British Council’s recent resilience programming in MENA has been included below, setting out underlying assumptions, objectives, and expected outcomes, all of which help provide a diagnostic framework for identifying any gaps in the project’s underlying logic.

An Example of a Theory of Change for a P/CVE Project: Strengthening Resilience – MENA II

**If** evidence about the specific problem of violent extremism in each context (who is recruited by violent extremists, where (the specific areas and communities), how (by what means) and why (for what purpose)) informs response

...**Then** we can target areas and communities at risk of violent extremism and identify area specific, hazards, policies and practices which exacerbate susceptibility to violent extremism

...**And** build individual and community resilience to violent extremism through a combination of local and/or national campaigns that communicate i) positive citizen and state initiatives to wider society; ii) specific campaigns focused on opportunities for young people;

...**If** in those areas we understand why there are so few political and economic opportunities for young people

...**Then** we can bring together appropriate state officials with credible CSOs and citizens to work on mitigation and better management of these concerns. By demonstrating the state’s intention to act on concerns with locally trusted interlocutors the corrosive effect of local grievances can be reduced

...**If** we can develop and institutionalise government communications capacity (including the ability to identify and work in partnership with non-governmental messengers who will be heard by susceptible individuals and communities)

...**Then** government will be able to deliver a rolling programme of communications which can adapt to the changing nature of the violent extremist threat and deliver positive alternative messages

...**This will**

* Increase general optimism
* Increase local trust in the state’s intentions
* Magnify the impact of work in the specific areas which are susceptible to violent extremism

...**Then** overall we will have reduced the attraction of extremist narratives and slowed down the numbers joining the extremist cause

...**And** increased trust in the state and the preparedness to work with the state to make positive improvements and wait for long-term reforms.
Conducting Research on Sensitive Issues and in Sensitive Environments

The analysis conducted at this stage requires the collection and analysis of data gathered from various EU internal and external sources. Research is therefore a fundamental part of the steps outlined above. It is important to note that the obstacles to comprehending VE and terrorism not only relate to the complex nature of this phenomenon but also to issues with data quality. There is, however, open-source information and intelligence available about VE and relevant contextual issues in most locations can be drawn from the academic literature, think tank papers, reports from civil society organisations, media sources, social media and so on.

The main field research methods generally include:

- **Key informant interviews (KIIs):** Interviewees will vary according to location, but may include implementers of related programmes, government officials, NGO workers, private sector representatives, religious or faith based actors and so on. Semi-structured research tools are generally preferred, allowing the research team to tailor their lines of enquiry while also covering the themes of key interest. These are often used to gather information about highly sensitive themes that people may not feel comfortable talking about in a group.

- **Focus Group Discussions (FGDs):** FGDs enable key information to emerge through discussion amongst participants, with the most suitable approach again generally being semi-structured research instruments. FGDs tend to be conducted with selected, homogenous groups (e.g. women, youths, religious leaders, etc.) and are often used in preference to one-on-one interviews to gain group perceptions of certain issues and to analyse the discussion that takes place between people.

- **Quantitative Surveys:** Surveys deliver statistically based information on a broad range of topics, for instance, regarding perceptions of the legitimacy of violence, perceptions of the state, local employment prospects and so on. In certain contexts, it is possible to conduct household surveys, which require specific statistical methods and sampling procedures for the selection of geographical locations (e.g. villages, towns and urban districts), households in these areas and individuals at the doorstep.

- **Observations:** Under selected circumstances researchers may be able to observe events that drive terrorism and VE, for example, sermons that advocate violence. However, more commonly this method is valuable for monitoring and evaluation purposes, as it is often possible to witness CT or P/CVE components in action, e.g. airport security conduct, community debates, livelihood trainings.

While these methods are straightforward in principle, specific issues routinely arise during the data collection process. It is therefore important to adopt a mixed method approach to draw from the strengths of each of the selected techniques outlined above, ‘triangulating’ information from various sources (state officials, religious leaders, community members, etc.) to the extent possible in order to cross-validate the collected data.

3.4. Formulation

The formulation phase aims at expanding the feasibility and sustainability of the project approaches that were identified during the previous stage, and to confirm the objectives and results foreseen. Situations can be volatile and rapidly shifting. As a consequence, programming often has to allow for a high degree of flexibility.

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84 Khalil and Zeuthen (2016).
85 While best practice for survey research varies considerably between locations, many important techniques are outlined, for instance, in the Asia Foundation’s ‘A Survey of the Afghan People’ (2014). In the absence of precise techniques, it is generally impossible to determine whether apparent patterns in the data represent genuine findings or are attributable to suboptimal or inconsistent methods. Unfortunately, cultural, logistical and security-based constraints often mean that in practice it would be necessary to compromise on rigour to the extent that this form of research is unsuited to the context.
86 See Khalil and Zeuthen (2016) for further information.
The assessment and analysis of the data relating to context, in particular factors of violent extremism, stakeholders and capacity gaps in relation to counter-terrorism will help generate the design of the intervention and the priorities to be addressed.

Activities must be developed based on the theory of change articulated in the identification stage. At this stage, the ToC should now be visualised through a logical framework or results framework, including progress, compliance and performance indicators.

The purpose of the formulation stage is to define all the CT-P/CVE project components in sufficient detail to enable the preparation of a financing proposal for individual projects.

Key steps are outlined in the box below:

<table>
<thead>
<tr>
<th>Objectives of the formulation stage</th>
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<tbody>
<tr>
<td>• To formulate components of a CT/CVE project(s) for support by EC co-operation.</td>
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<thead>
<tr>
<th>Input of the formulation stage</th>
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<tr>
<td>• Context analysis including factors of VE, capabilities and methods of terrorist actors, institutional capacity analysis, stakeholder mapping and CT-P/CVE mapping. An important dimension of this process involves identifying any relevant on-going EU-led CT dialogue or CT packages.</td>
</tr>
<tr>
<td>• Pre-feasibility or identification mission report.</td>
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<tr>
<td>• Theory of change.</td>
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<tr>
<th>Tasks of the formulation stage</th>
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<tr>
<td>• Commission preparation of feasibility study for project components and parameters.</td>
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<tr>
<td>• Carry out a feasibility study applying participatory methods.</td>
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<tr>
<td>• Identify project components or areas.</td>
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<tr>
<td>• Analyse proposal(s) in accordance with CT-P/CVE principles.</td>
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<tr>
<td>• Identify potential partners and alternative modes of project execution.</td>
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<tr>
<td>• Integrate human rights and gender into programme/project design.</td>
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<tr>
<th>Output of the formulation stage</th>
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</thead>
<tbody>
<tr>
<td>• Action Document.</td>
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<tr>
<td>• Feasibility report for a CT-P/CVE project.</td>
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<tr>
<td>• CT-P/CVE Project components shortlisted.</td>
</tr>
<tr>
<td>• Log frame or results framework.</td>
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<tr>
<td>• Indicative budget.</td>
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<tr>
<td>• Technical and financial proposal(s) for CT-P/CVE project.</td>
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<tr>
<td>• Operational plan for the project implementation.</td>
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Shortlisting Programme/Project Components:
It is worth reiterating the critical point that the factors of VE and CT capacities of states vary considerably between contexts, and the distinctive features of the specific environment must be reflected in the programme/project design. The formulation must therefore avoid ‘off-the-shelf’ or ‘cookie-cutter’ approaches. Activities have to closely match the reality of the local situation. The prospective implementing partners and other local stakeholders should usually take a lead role in the project formulation stage in order to help ensure ownership and commitment. However, donors (including the EU) often take an active supporting role with respect to the financing and management of feasibility/design studies, including the provision of technical assistance/advisory inputs.

A simple technique that can initially be applied by programmers is to list the key factors of VE identified (for P/CVE projects including any gender distinctions) or the weaknesses or capacity gaps in government and related security and justice institutions (for CT projects). Once this list is complete, candidate responses may be identified that correspond to each of these factors (see the table below for some examples).

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The process of initially selecting from this list will involve assessing the feasibility of the various options in light of the existing political, economic and security-based constraints in the location in question. Clearly, however, selection should also be based on merit, that is, in relation to the extent to which these options are likely to contribute to the desired programme impact in an effective, efficient and sustainable manner.

<table>
<thead>
<tr>
<th>Factors of VE</th>
<th>Sample Programme Types</th>
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<tbody>
<tr>
<td>Capacity gaps</td>
<td></td>
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<tr>
<td>Weak law enforcement and criminal justice capacity in relation to CT</td>
<td><strong>PURSUE</strong></td>
</tr>
<tr>
<td>Lack of legal understanding surrounding returning foreign fighters</td>
<td>Support national criminal justice and rule of law reform focusing on enhancing the professionalism, integrity, and human rights standards, access and service delivery among judicial officers. E.g. <strong>Counter-Terrorism Criminal Justice Support to Senior Judicial Officers in Transition Countries</strong>: building capacity of senior judicial officials to engage in counter terrorism cases in rule of law consistent and effective manner.</td>
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<tr>
<td>Weak, limited or developing capacities in financial regulation and security</td>
<td>Strengthen the capacity of national governments and law enforcement agencies to deal with returning foreign fighters. E.g. <strong>Global Project on Strengthening the Legal Regime Against Foreign Terrorist Fighters (FTFs) in the Middle East, North Africa and the Balkans</strong>: 1) Develop the capacity of criminal justice officials in MENA and Balkan countries to deal with specific legal aspects related to countering FTFs at the national and regional levels; 2) Enhance inter-institutional cooperation in encouraging a comprehensive whole-of-government approach, including at the policymaking level and with national parliaments; 3) Enhance international, regional and sub-regional cooperation concerning specialised counter-terrorism aspects related to FTFs, between MENA, the Balkans and partner countries.</td>
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<tr>
<td>Limited security and emergency response service capacity</td>
<td>Countering terrorist financial networks and avenues for VE groups to access funds. E.g. <strong>Support Measures to Combat Corruption and Money Laundering and Asset Recovery in Egypt</strong>: provides assistance to the Egyptian government to establish effective mechanisms to combat corruption and money laundering in Egypt, as well as to establish the necessary framework for implementing the United Nations Convention Against Corruption (UNCAC).</td>
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**RESPOND**

Improve the capability of security and emergency response services to manage and mitigate the consequences of a terrorist attack. E.g. **Building National Stability in Lebanon**: integrating Border Management with ICMPD, improving the delivery of police services and improving the capacity for emergency preparedness and crisis response, particularly in terms of chemical, biological, radiological and nuclear (CBRN) defence.
<table>
<thead>
<tr>
<th>Factors of VE</th>
<th>Sample Programme Types</th>
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</thead>
<tbody>
<tr>
<td>Weak security at key transport hubs</td>
<td><strong>PROTECT</strong></td>
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<tr>
<td>Sample Programme Types</td>
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<tr>
<td>Weak critical infrastructure security</td>
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<tr>
<td>Provision of technical assistance in</td>
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<tr>
<td>Provision of technical assistance in</td>
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<td>airports and ports to improve security</td>
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<td>through, for example, training and</td>
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<tr>
<td>screening equipment. E.g. **Civil</td>
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<tr>
<td><strong>Aviation Security (CASE):</strong> contributing</td>
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<td>to increased capacities of the aviation</td>
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<tr>
<td>administrations and law enforcement</td>
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<tr>
<td>authorities in Africa and Arabian</td>
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<tr>
<td>Peninsula in the field of aviation</td>
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<tr>
<td>security. E.g. <strong>Critical Infrastructure:</strong></td>
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<tr>
<td>Improvement of Security Control Against</td>
<td></td>
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<tr>
<td>the Terrorist Threat (CIIS): promoting</td>
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<td>information exchange on cyberterrorism</td>
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<td>and the use of the net for radicalisation</td>
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<td>purposes among European authorities and</td>
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<td>between public and private sectors,</td>
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<td>culminating in the dissemination of best</td>
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<td>practice guidelines, awareness raising</td>
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<td>between critical infrastructure operators,</td>
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<td>the development of training exercises to</td>
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<td>protect critical infrastructure in</td>
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<td>cyberspace, and the consolidation of</td>
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<td>communication channels between operators</td>
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<tr>
<td>and EU member states.</td>
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<tr>
<td>Structural Factors of VE</td>
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<tr>
<td>Perception of marginalisation and</td>
<td><strong>PREVENT</strong></td>
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<tr>
<td>discrimination among sections of the</td>
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<tr>
<td>population who are ‘at risk’</td>
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<td>Provide programmatic support to credible</td>
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<td>religious or faith based actors within</td>
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<td>vulnerable communities and host inter-faith</td>
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<td>dialogues with religious or faith based</td>
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<td>actors for communities to express</td>
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<tr>
<td>grievances, E.g. **Strengthening the</td>
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<tr>
<td>Capacities of Sunni Institutions to</td>
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<tr>
<td>Enhance Stability and Religious Tolerance</td>
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<tr>
<td>in Iraq: mitigating the appeal of radical</td>
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<td>ideas and promoting moderate narratives</td>
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<td>within the Sunni community by providing</td>
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<td>capacity building and training on</td>
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<td>conflict transformation, non-violent</td>
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<td>communication and outreach activities to</td>
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<td>clerics, religious schools, academia and</td>
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<td>the media.</td>
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<td>Ensure horizontal social parity by</td>
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<td>facilitating fair and equitable access</td>
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<td>to resources between various demographic</td>
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<tr>
<td>groups. E.g. **Combating Religious</td>
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<tr>
<td>Discrimination in Southern Iraq:** Specific</td>
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<tr>
<td>Objective 1: Reduce sectarian conflict,</td>
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<tr>
<td>violence and the potential of violence</td>
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<tr>
<td>between differing religious communities.</td>
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<tr>
<td>Specific Objective 2: Ensure equitable and</td>
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<tr>
<td>fair access to social, economic and</td>
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<tr>
<td>political rights for religious minority</td>
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<td>communities in Iraq.</td>
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<td>Lack of employment opportunities</td>
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<td>Address unemployment in ‘at-risk’</td>
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<td>communities by supporting microfinance</td>
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<td>programmes, business entrepreneurship for</td>
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<td>youth, women and vulnerable communities,</td>
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<td>and providing training workshops that teach</td>
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<td>marketable skills for employment, such as</td>
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<td>agriculture, infrastructure and small</td>
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<td>business. E.g. **Deepening Economic</td>
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<tr>
<td>Development for Peace and Stability in</td>
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<tr>
<td>Plateau State, Nigeria:** contributing to</td>
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<td>the reduction of conflicts and improving</td>
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<td>peace and stability through employment</td>
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<td>creation and increased income.</td>
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## Factors of VE

### Sample Programme Types

<table>
<thead>
<tr>
<th>Individual/Group Factors of VE</th>
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<tbody>
<tr>
<td>Sense of belonging and identity</td>
<td><strong>Work with educators and educational institutions</strong> to develop curricula that promote inclusiveness and tolerance, and extra-curricular activities that can bring diverse communities together, for example <strong>Through Development of (Counter) Radicalisation Monitoring Tool:</strong> creating education resources for counter-radicalisation based on testimonies of victims/former extremists/family members consisting of counter-narrative films and a multilingual online education resource guide for formal (schools/colleges) and informal (youth/community orgs) education spaces.</td>
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<tr>
<td>Financial and material benefits</td>
<td><strong>Partner with local NGOs to identify a listing of apprenticeships and match at-risk youth with these opportunities, foster public-private partnerships to increase the scope and volume of service delivery options. E.g.</strong> <strong>Supporting Stabilisation and Resilience in the Diffa Region in Nigeria and Preventing Tensions Linked to Migration:</strong> support for resilience and economic recovery at the community level by promoting vocational training to stimulate youth employment.</td>
</tr>
</tbody>
</table>

### Enabling Factors of VE

| Radical and charismatic leaders or peers in the community | Provide alternative sources of positive individual and group support. E.g. **Strengthening Resilience to Violence and Extremism in the Horn of Africa:** A key component of this programme included a mentorship scheme, providing space for dialogue and an opportunity to identify and respond to the needs of vulnerable youth constructively on a personal level, and provided positive role models for beneficiaries to emulate. |

### Targeting CT and P/CVE Programmes

P/CVE programmes should generally be targeted at individuals or groups who are at-risk of radicalisation or recruitment into VE movements, while CT programmes should be focused on building the CT capacity and capability of the government.

### Examples of CT-Specific programmes.

The **Counter-Terrorism Sahel (CT Sahel)**, funded by the Instrument for Stability was designed to ‘support national capacities to combat terrorism and organised crime, and reinforce regional cooperation’. The programme comprised three national-level capacity building initiatives focusing on law enforcement agencies and specialised judicial institutions in Mali, Mauritania and Niger, and a concurrent regional level training scheme facilitated by the College Sahelien de Securite (CSS). It involved interdependent and mutually reinforcing objectives that improved procedures for exchanging intelligence between states, consolidated the operational capabilities of national judiciaries, security forces, and installed coherent mechanisms for trans-Sahelian coordination to counter terrorism and organised crime.

**CT CAPRI** was a 40 month collaborative project running from 2013 to 2016 under both the Instrument for Stability, and the Instrument contributing to Peace and Security. The purpose of the intervention was to improve the ability of Punjabi agencies in Pakistan to successfully investigate, prosecute, convict and detain terrorists.

This is not to say that governments and governance institutions are not key stakeholders in or programme or project beneficiaries of P/CVE activities. But the point is that P/CVE activities are designed to decrease...
the pool of potential recruits to VE groups. One area of P/CVE work that specifically targets governments as implementers, however, is the current drive to support the design and implementation of national P/CVE strategies. In this case, the government is also often the main beneficiaries, at least in the short-term.

P/CVE programmes generally aim to target individuals specifically identified as ‘at risk’ of or ‘vulnerable’ to being drawn to violence to the extent feasible in any given location. It is important to determine which communities and segments (age groups, gender, socio-economic groups, ethnic or religious groups etc.) of society are targeted and recruited by VE organisations. A failure to focus programme activities on those specifically ‘at risk’ will undoubtedly cause initiatives to underachieve in terms of actually contributing to a reduction in VE. As indicated in the diagram below, while development and humanitarian interventions can be delivered to the broad mass of the population, P/CVE interventions should more often be focused on a smaller number of groups or communities that are identified to be ‘at risk’ and CT interventions may be even more restricted.

For example, the *Strengthening Resilience in MENA* (specifically focusing on Tunisia, Morocco and Lebanon) project funded by the Instrument contributing to Stability and Peace (November 2015 - April 2017) specifically concentrated on communities with a high departure rate of foreign fighters migrating to Syria.

**Figure 3: Depiction of intervention hierarchy**

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**Integrating Human Rights in CT-P/CVE Projects**

In the formulation stage, the actions proposed should directly integrate the human rights and gender obligations. It will be important to follow the *Operational Human Rights Guidance for EU external cooperation actions addressing Terrorism, Organised Crime and Cybersecurity.*

When designing programmes addressing terrorism and violent extremism, EU staff should assess all the risks that could negatively impact on the exercise of human rights through the planned actions and their management. This is particularly important in CT programmes and projects since, as already noted, developing CT capacities may inadvertently compromise human rights aims. As outlined in Chapter 2, CT-P/CVE interventions should try to respect the twin principles of Do No Harm and Do Maximum Good.

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**Gendered Approach to CT-P/CVE Projects**

For a number of years there has been a longstanding commitment to incorporating ‘gender’ across all development and security interventions, including at the highest institutional levels of international counterterrorism. Traditionally there has been an insufficient gender focus in security institutions, which has led to a bias in considering women, even when they are embedded in the roots of terrorist organisations and their supporting movements.\(^1\) Therefore, integrating gender often essentially means including women. Women can play important roles in international peace and security efforts, including conflict resolution and peacebuilding, in line with UN Security Council Resolution (UNSCR) 1325.\(^2\) The latest such guidance is the 2015 UNSCR 2242,\(^3\) which calls for the inclusion of women in devising programmes to counter violent extremism, and the EU’s Gender Action Plan II (GAP II), which advocates the mainstreaming of gender issues, particularly the emancipation, empowerment and equality for women.\(^4\)

Under the terms of the UN Secretary General’s Plan of Action, preventing violent extremism should protect and empower both women and women-led organisations. Consequently, there have been initiatives that seek to empower women and, particularly, mothers (which need to be properly evaluated) to take a more active role in the community, family and economy, and create spaces for raising awareness about VE.

Though including women is important, projects targeting women can be based on assumptions. There is (so far) no definitive evidence of regarding the specific advantages of women in P/CVE. However, in some communities, women may be traditionally well placed to shape family and social norms and promote increased tolerance and nonviolent political and civic engagement.

Many women’s rights organisations’ objectives and achievements are being threatened by extremists, which can also make them important partners in P/CVE efforts. These organisations may be well positioned to reach women who may be vulnerable to supporting or joining violent extremist groups and offer them positive alternatives in airing their grievances. At the same time, the cultural and social restraints that limit women’s participation in the social sphere and the potential opposition to the engagement of women in P/CVE programming need to be appreciated.

Security also needs to be considered. Practitioners have attested to the increase in operational effectiveness as a result of women’s participation in policing. Women police officers and security officials are also needed to investigate female terrorist suspects. However, in some contexts including women in the policing sector can lead to further violations of their rights, for example, if their security is not guaranteed in the workplace. P/CVE projects emphasising the role of ‘mothers’ as best able to ‘spot the signs of radicalisation,’ can essentially leverage women as ‘intelligence gatherers’ increasing the risk to their personal safety and prioritising their agency as ‘mothers’ above the ‘variety of other roles they play in society,’ which can in some cases entrench stereotypes that can be disempowering.\(^5\)

The increased attention of the international community to the role of women in the security field and in CT-P/CVE efforts is to be welcomed. But many international efforts to engage women fail to incorporate a gender perspective and hence perpetuate stereotypical notions. It is also important not to neglect the role of fathers, brothers or men in interventions acknowledging that men and women or mothers and fathers may, in some circumstances, potentially have different skill-sets. Effective efforts to deal with violent extremism require that we pay greater attention to gender relations and gender inequalities within societies.

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Results Framework/Log Frame

Building on the theory of change, it is important to depict this in a results framework or a logframe. The European Commission defines a results framework as ‘a tool that is used by development partners to measure results achieved against strategic development objectives. The results framework can be seen as an articulation of the different levels, or chains, of results expected from the implementation of a particular strategy, programme or project’.\(^96\) An illustrative example of a results framework for a P/CVE project was developed by Khalil and Zeuthen.\(^97\) This model is being used in a current EU programme, Strengthening Resilience to Violent Extremism (STRIVE II) in Kenya, and is depicted on page 42. An example of a countering the financing of terrorism (CFT) / anti-money laundering (AML) log frame is included in the annex.

The results framework needs to be related to a number of relevant aspects, including the management, efficiency (e.g. is the process leading to results at a reasonable cost) and effectiveness (e.g. does the process lead to the desired results) of the implementation process. The relevant information should be captured and interpreted through continuous monitoring over the course of the project’s life-span.

It is important to note that there is an underlying tension when conducting CT and P/CVE activities between the need for rigid programmatic parameters that are largely transparent, durable and coherent, and the importance of maintaining a flexible approach capable of responding to transient variables and conditions. It is therefore essential to strike a balance between these demands, which will inevitably depend on the dynamics and operational specificities of individual projects. Thorough risk and context analyses can help strengthen an intervention’s relevance and integrate contingencies, particularly when it is supplemented with consistent monitoring over the initiative’s entire life-cycle through, for example, stringent feedback loops. This can help lay the groundwork for adapting any objectives, modalities or outputs in real-time without necessarily compromising the programme’s procedural or financial integrity.

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Defining Specific Indicators for CT and P/CVE

Benchmarks or indicators for success should be identified at the formulation stage to facilitate programme monitoring and evaluation. These benchmarks will help establish objectives against which progress can be assessed. Given the highly contextualised nature of CT and P/CVE programming, a set of universal indicators is inadvisable; rather indicators should be closely tied to the project being developed and the ToC that underpins it. They should, where possible, also be SMART: Specific, Measurable, Achievable, Relevant and Time-Bound. Benchmarks should be closely related to the objectives of the intervention and the target audience.

It is also vital to collect baseline data to establish the start point for an intervention, as without it implementers will be unable to demonstrate progress at latter stages. Indicators should be established at every level of the ToC, but particularly outputs, outcomes and impact. Measurement is more difficult at higher levels of the ToC. Inputs and activities are easy to measure, while impacts are more difficult. Moreover, at the higher levels (outcomes and impact), implementers may have less control over the variables. This leads to a well-known problem in evaluation: attribution. While a reduction in VE in a given location may be driven by a specific CT-P/CVE intervention, such a change may also be a consequence of lower levels of violence in neighbouring locations, political accommodations, an economic boost, a decrease in the availability of arms and other equipment and so on.

For these reasons, programmes often over-rely on measurement at the lower level, such as the amount of money spent, the number of days spent on an activity, etc. However, it is vital to monitor and evaluate at the higher level to ensure that interventions are efficient, effective and relevant. The following sections provide guidance on how this can be done in CT-P/CVE.
What Should be Measured?

Once the anticipated result is clearly articulated and defined, it is necessary to identify the kind of information and sources of verification required to measure the expected progress. This will depend on the specific results to be attained.

For CT projects, it may be relevant to measure, for example, the number of violent incidents in a certain period or in a certain area, the number of arrests or prosecutions, the number of human rights violations in CT operations, and perceptions of police and security services on the part of citizens.

For P/CVE projects, it may be relevant to measure, for example, the attitude of the population towards the government representatives, the level of cooperation with law enforcement, and any changes in opinion of the target population in relation to certain VE organisations.

Outputs are more easily measured in quantitative terms than outcomes and impact.

Outcome indicators measure the impact of policies and measures on the realisation of the goals and objectives CT-P/CVE activities. A reduction in support for VE organisations and a reduction of violent behaviour will generally be the desired outcome. The defined intermediate steps during the project activity will differ accordingly. This can vary from reducing traction to the early identification of violent actors.

Indicators used to evaluate the outcomes of a P/CVE intervention can include changes in knowledges, skills and attitudes.

There are numerous examples of existing monitoring and evaluation frameworks, including the Outcome Indicators for the Instrument Contributing to Stability and Peace (incorporating both P/CVE and CT indicators) and Development Approaches to Countering Violent Extremism designed by Australian Government’s Department of Foreign Affairs and Trade. While these will have to be revised to reflect the specificities of individual CVE projects, they nevertheless provide useful templates for building rigorous metrics and broader M&E regimes.

A list of example indicators for both CT and P/CVE programmes is provided in the Evaluation section of these guidelines on page 51.

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3.5. Implementation

Some key steps to consider in the implementation phase are included in the box below:

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<thead>
<tr>
<th><strong>Objectives</strong></th>
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<tr>
<td>• To efficiently execute, manage/implement, monitor a CT-P/CVE project.</td>
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<tr>
<th><strong>Inputs</strong></th>
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<tr>
<td>• Project operational plan and financial proposal.</td>
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<td>• Monitoring indicators and results framework or log frame.</td>
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<td>• Supporting documentation.</td>
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<tr>
<th><strong>Tasks</strong></th>
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<tr>
<td>• Make sure that a project team and an interactive action planning process are defined.</td>
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<td>• Supervise establishment and implementation of the project, where necessary with specialist input from national and EU CT/Security experts.</td>
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<tr>
<td>• Make sure a monitoring system is in place.</td>
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<tr>
<th><strong>Outputs</strong></th>
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<tr>
<td>• Communications and visibility strategy.</td>
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<td>• Successful project implementation.</td>
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<td>• Project implementation review(s).</td>
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Implementation takes place once the CT-P/CVE project has been approved. This includes establishing the mechanisms for implementing the project, managing it over time and monitoring performance.

**The inception phase**

The first phase of implementation is called inception. The inception phase of the project offers the opportunity to confirm the context analysis and the assumptions and risks that had previously been formulated. The start of projects may occur many months after the conclusion of the formulation processes, depending on the time interval taken between the decision and the contracting period. VE groups can change rapidly while fragile state contexts are often fluid. The implementation team therefore needs to verify whether the analysis is still valid.
Stakeholder Engagement and Coordination

During the implementation stage, it will be necessary to engage all the stakeholders identified by the stakeholder mapping process. At the policy level, it is important to maintain the engagement of government at the national (and possibly subnational) level. The commitment of host governments to address these sensitive issues in practice may vary enormously according to the context. Project outcomes may be seriously compromised without regular dialogue.

The project management team should consult and coordinate with all relevant stakeholders and project beneficiaries that participated in the identification phase by attending briefings and discussion meetings on a bilateral or multilateral basis.

This promotes transparency and accountability, facilitates an understanding of the institutional landscape and their available capacities, and ensures an updated diagnosis of the specific issues to be addressed. Flexibility in the conduct of the consultation is required to adapt to rapidly changing situations, to identify innovative newcomers and social entrepreneurs, and to prepare the potentially necessary changes.

The stakeholder coordination process facilitates increased exchanges between the different institutions that perform at the national and regional levels, which can be lacking in the security and justice sectors.

Local community engagement in P/CVE activities

CT programmes focus on building the capacity of government, and particularly security and justice institutions, and therefore operate at an institutional level. In contrast, P/CVE programmes or projects need to gain support and input from local communities where they are being implemented – including local figures of influence (such as local elders, local religious figures, those with political power, etc.). Rigorous contextual analysis and conflict sensitivity is essential for navigating these local dynamics, and for understanding how interventions, partnerships with particular grass-root stakeholders and an influx of external funding will interact with prevailing conditions on the ground. By diagnosing these issues in sufficient detail, practitioners can factor in balance, caution and re-direction where necessary to avoid doing harm and to help maximise the benefits from their project’s modalities. Local perceptions are also crucial to developing P/CVE engagement that resonates with the target audience.

Cultural sensitivities will be critical in shaping locally acceptable programmes. It can also be beneficial to proactively engage youth and women to ensure the buy-in of the whole community, though cultural restrictions need to be considered to avoid alienation at the outset (e.g. take into account the implications of working with women, as discussed). For example, a programme that is designed to foster youth leadership and inter-faith or intra-faith dialogue may need to be gender-segregated to allow both girls and boys access, but in different spaces.

Where feasible, implement the programme in partnership with vetted local partners and tailor it to the socioeconomic, cultural and political environment to maximise community support and engagement. Local practitioners will often be better placed to identify key target audiences and provide current information about the evolving nature of VE.

While it may be useful to work with those whose principles are aligned with those of the EU, local religious or faith based actors or community elders may have valid inputs into local contexts, dynamics and cultural sensitivities but may not always share the same principles as the EU. In P/CVE interventions, in particular it is important to work with local actors who best represent communities but who may be less conventional than westernised NGOs.

There are also a range of challenges and issues specifically related to engagement with religious actors in the P/CVE space that must be considered in the context of both policy-making and programme implementation.
Challenges Associated with P/CVE Engagement by Religious Actors

- **Policy-makers have conflated conservative religious ideas with extremism.** Many religious individuals, groups and institutions do not subscribe to liberal values on a range of issues. As a result religious conservatism is sometimes wrongly perceived as a slippery slope to violent extremism. In reality, as noted in Chapter 1, assumed linkages between conservative ideas, radicalisation, and violent extremism have not been supported by the evidence. However, these assumptions have, in effect, stigmatised a range of views and practices previously not seen as posing a threat to security (even though they may not be in line with human rights and democratic values that the EU is seeking to uphold and promote).

- **Religious communities are very diverse ethnically, politically and theologically, with a spectrum of distinct schools and legal traditions.** Experience shows supporting one particular religious strand against another, or promoting ‘moderate’ religious interpretations, is counter-productive: it is unclear what ‘moderate religion’ means in practice and relies on the spurious premise that ‘moderate religious actors’ are the most effective partners for tackling violent extremism. Crucially, the politics of labelling, whereby an individual or groups is categorised as ‘moderate’, has a tendency to delegitimise recipient actors in the eyes of their communities and does little to diminish the attraction of more radical alternatives.

- **Programmers and policy-makers usually only interact substantively with religious or faith based actors on matters of security to solicit cooperation with local projects, the generating of counter-narratives and intelligence gathering.** This instrumentality risks alienating communities. Instead engagement needs to be comprehensive and sustained, predicated on a partnership in which they are appreciated as genuine stakeholders in their society.

- **On a practical level, the involvement of religious leaders has produced mixed results, with evidence suggesting that, in some instances, they prove to be more of a hindrance than a help.** These self-ascribed ‘gate-keepers’ may not credibly represent the communities they claim to speak for and/or often import their own politicised agendas that can diverge from, or contradict, the objectives of P/CVE programmes they allegedly support. A clear example can be seen during the EU’s STRIVE HoA project, where local Muslim leaders safeguarded their own positions of authority by constricting the autonomy youth and women had to engage with community issues. Inter-generational tensions have also become evident; established authorities may not be attuned to local needs, interests and anxieties experienced by their younger constituents, and therefore risk irrelevance when they cannot effectively engage in areas beyond their specific expertise such as current affairs.

### Risk Management

Risk is any external influence that is beyond our control. In PCM a risk is something which has the potential to prevent or inhibit a project from achieving its desired results. Note that in CT, risk is also used to mean the probability and impact of a successful terrorist attack. Here we refer to risk in its PCM sense.

Risks in CT and P/CVE may originate from various sources, and have diverse impacts. To ensure that all of the most important risks are identified and assessed, risk identification is often carried out under categories. Categories of risk to consider in CT-P/CVE work include operational, security, legal, political, and reputational. Once identified, risks should be assessed in terms of probability or likelihood and impact. Using this assessment, probability and likelihood can be scored numerically or using a simple scale (e.g. low, medium, high). The results are often then presented in the form of a risk matrix, with probability and impact on different axes, to show which risks are the most important to consider.

The next stage in risk assessment is to develop a risk management plan. Risks can be mitigated (by carrying out an activity which makes them less probable or have a lower impact), transferred to another individual or organisation (purchasing insurance is the most common form of risk transfer), tolerated (by deciding that the risk is so unlikely or has such a low impact that it makes sense to do nothing about it), or avoided (by not conducting the risky activity in the first place).

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103. Strengthening Resilience to Violent Extremism (STRIVE) in the Horn of Africa: Lessons Learned, April 2017, RUSI.
104. Strengthening Resilience to Violent Extremism (STRIVE) in the Horn of Africa: Lessons Learned, April 2017, RUSI.
As previously mentioned, CT and P/CVE activities inevitably involve risk. Sometimes risk avoidance may be justified, for example if the security situation is so poor that security risks to personnel cannot be mitigated. Some risks may be transferred (e.g. by seeking political clearance within the EU for an action which poses particular risks.) But in most cases, CT and P/CVE programmers will look to mitigate risks through planned ‘de-risking’ activities, which can help minimise any harmful impacts or externalities and maximise positive contributions in support of stability and peace.

**Categories of Risk**

**Financial:**
Risks are those associated with the funding of an action, such as a failure to obtain adequate funds, or an unexpected financial change (for example in an exchange rate). These should be mitigated by careful planning, allocating contingency funds if necessary, and making space for flexibility to respond to change.

**Operational:**
There are a range of macro-risks associated with both CT and P/CVE programming that need to be considered during both design and implementation. These include:

- Risks associated with national and sub-national partners: It is important CT-P/CVE activities are designed and delivered with local input, but these stakeholders (including actors from civil society, government and the private sector) may lack expertise or experience working on these issues or managing the risks and sensitivities they often involve. If sufficient contingencies are not in place there is a danger these limited capacities may cause inefficiencies in programme implementation, or at worst become detrimental to the intervention’s core aims. Ensuring programmes and projects are sufficiently sensitive to surrounding conflict dynamics is a crucial avenue for minimising these issues: mapping the capacity and agenda of prospective stakeholders, understanding the relationships and motivations within and between communities, and prescribing clear pathways for mitigating any weaknesses, gaps or potential problems at the local, regional or national level.
- Links with military-security agendas: P/CVE efforts are often implemented in contexts where donor governments have major geostrategic interests or are involved in military/stabilisation operations (e.g. Afghanistan, Iraq or Yemen). Such interests and operations can exacerbate conflict or public grievances. It is therefore important to take into account that these environments and related approaches could undermine P/CVE goals.
- P/CVE programmes may also:
  - Support civil society to challenge the ideology and behaviour of ‘extremists’ while failing to empower people to challenge other conflict actors for their behaviour.
  - Focus on tackling ideologies with insufficient effort to change the lived reality that may underpin the actions of violent individuals and groups.

**Security:**
CT and P/CVE work seeks to reduce the risks posed by violent extremists, and therefore often takes place in environments with particularly high security threats from the extremists themselves, from actions of the state, or from others such as criminals or non-extremist armed groups. Given that VE groups may be aware of CT-P/CVE initiatives this may lead to violent responses by the VE groups towards individuals, communities or government representatives. Mitigating security risks – for example, by employing armed guards for field missions to hostile environments – is often expensive and it is essential that adequate funding is set aside. Personnel deployed to high-risk environments must be sufficiently trained. At the same time, the limited access to, and understanding of, some of the most vulnerable recruitment zones as well as the risk of unintentionally fuelling recruitment narratives needs to be taken into account. Conflict sensitivity is vital in these contexts for helping practitioners clearly identify the prevailing dynamics, perspectives and priorities of local stakeholders, and for appreciating how CT or P/CVE interventions will disrupt or interact with pre-existing conditions.

**Legal:**
Some CT and P/CVE programmes are explicitly concerned with promoting the rule of law, and terrorism is generally a crime, so it may be hard to see how CT and P/CVE entail legal risk. However, there are
particular risks associated with extra-legal and extra-judicial approaches to CT taken by some states, and which derive from international and national human rights obligations.

CT and P/CVE interventions may, for example, enhance state capabilities, which could in some circumstances be used unlawfully. This is another reason why human rights compliance is of critical importance in CT and P/CVE activities. Many countries have laws governing international organisations and NGOs (e.g. requiring registration with the authorities or governing payments from overseas bodies), so working with partners in those countries may expose them to legal risks.

Political:
Political support will usually be a pre-requisite for CT and P/CVE external actions. Lack of political support, or its withdrawal, is a substantial risk in this area, which needs substantial mitigation if an action is to succeed. While the implementers of a project have a major and obvious role in ensuring and maintaining political support, much of the burden will fall on the EU, both headquarters and delegations. Officials need to be prepared to invest substantial time and attention in ensuring that the political environment is conducive to a CT or P/CVE project.

It is also important, particularly for P/CVE interventions, to ensure that partners and interlocutors remain credible with the target audience and that their engagement in P/CVE efforts does not compromise their ability to deliver effective messages. That might require them to be seen as ‘independent’ as possible of foreign powers and influence. An active civil society is essential for a strong and sustainable social contract but entities with financial and/or political linkages to international actors are susceptible to real or perceived co-optation (whether deliberate or accidental) and are often stigmatised or viewed with suspicion by the communities in which they operate. Depending on the national context, CSOs may also suffer increased harassment by the state and its affiliated security apparatus. The utility of these partnerships and programmes needs to be thoroughly considered in line with its local specificities before any intervention is launched.

Reputational:
CT and P/CVE tends to be controversial by its nature, and some activities in this field could be interpreted in a negative light and therefore damage the EU's reputation. In particular, CT and P/CVE assistance involves working with governments and NGOs/civil society organisations in societies which do not necessarily share the EU's values. It is therefore essential to plan actions and communication strategies to ensure that the EU's reputation is not compromised.

This includes taking into account the need to identify implementing partners with sufficient credibility and impact on the ground. Domestic ownership requires engagement with, and the autonomy of, local actors, although they may not necessarily have extensive experience in the realms of CT-P/CVE. It should be taken into account, however, that certain actors may appropriate the prevention brand as a mechanism for soliciting external funding when their work, for example, is more associated with conventional peacebuilding or development activities. It is therefore important to accurately establish which stakeholders should receive financial/material support, and where international expertise should be allocated to best maximise the programme’s outputs.

Administrative:
The beneficiary government(s), although expressing political support for the CT intervention, do(es) not provide the EU experts with resident visas. This can be a result of a lack of appropriate interministerial coordination. The Ministry of Foreign Affairs or Ministry of Interior may be in favour of the project, but the Ministry of Immigration may prove to be unable to provide the EU experts with resident visas. This may happen in situations where there is no formal commitment by the beneficiary countries (e.g. in the form of a Financing Agreement). It is important for the EU Delegation to continue to follow up with the beneficiary government, advocating a regularisation of the resident status of the EU experts.

Another risk to consider is the limited capacity of CT-P/CVE projects to address the individual level. While recruitment and radicalisation processes are non-linear, fluid, and often manifest on a very personal level, policy and programming is inherently constrained by its need for financial and operational aggregation.
Develop Local Capacities
The principle of ownership is crucial for the success of a CT-P/CVE project; particularly in ensuring that the impact of the action continues after the project is completed. It is important to ensure that identified projects are realistic within the context of local capacity and that projects strengthen local capacity where appropriate. Ensuring a transfer of knowledge or expertise that will support empowerment and ensure the sustainability of the CT or P/CVE intervention can do this.

For example, launched in 2014, *Counter-Terrorism Criminal Justice Support to Senior Judicial Officers in Transition Countries* was established as a two-year programme aiming to develop a sustainable, non-political forum for the exchange of good practices by and for actors involved in terrorism cases. This included engaging officials in the long-term on how to adjudicate in a rule-of-law and human rights compliant process which respects international law, and produces an analytical study reflecting priorities, challenges and recommendations identified by the participating judges on handling terrorism cases.

In another example, lessons learned from *STRIVE Horn of Africa* emphasised that religious and community leaders, journalists, broadcasters and other stakeholders should receive training to sufficiently understand what is meant by violent extremism and P/CVE. While many initiatives are largely designed by specialists due to a lack of local proficiency and experience in preventive programming, sub-national partners need to have a baseline appreciation of P/CVE so they can have positive input into the design of effective projects. This is critical for cultivating a shared sense of local ownership, and to ensure activities are suitably targeted and sensitive to contextual peculiarities. This also ensures that the impact of the action last beyond the period of the project itself.

Develop a Communications Strategy: Information and Visibility
A communications strategy be produced to inform local, national, regional and international audiences, as appropriate, about the project. The EU should encourage the key actors to exchange information on a regular basis regarding the progress of project activities, beyond the formal meeting requirements established. The project manager should ensure that the guidelines contained in the Communication and Visibility Manual for EU external actions are respected.

As explained on page 11 of this guidance document, recruiters are often successful in mobilising sympathies and active support due to the emotional impact of their messaging. Counter-narratives are commonly referenced in academic and policy circles as a means of responding to this content, but it often risks falling into, and thereby reinforcing, the discursive vision presented by violent extremist actors. Instead, it is important to highlight the utility of ‘alternative pathways’ that challenge extremist propositions and recruitment narratives by proactively offering independent ideas and arguments to recipient audiences. Furthermore, it is important to note that in many cases communications for CT and P/CVE may need to be limited and sometimes it may be best to avoid messaging due to the sensitivities involved.

In relation to CT it may be important to take into account the sensitivities of the donor government and the donor itself about the receipt or provision of CT assistance. In P/CVE, it may be wise to avoid drawing the attention of VE entities, thus avoiding a potential threat to implementing partners and stakeholders. It may be necessary to tone down P/CVE language as the use of such labels may polarise communities. At the same time, it is important to consider the risk of alienating the community by being viewed as doing ‘covert’ P/CVE activity hidden in development activities.

For example, a key lesson learned from STRIVE (Horn of Africa) emphasised that CVE material should avoid displaying donor/external organisational branding, and should not necessarily explicitly label content as ‘P/CVE’, especially when it will be disseminated for broader public consumption.

These issues highlight an underlying tension of P/CVE programming, namely the importance of being transparent in what activities are designed to achieve vs issues with securitising partners, practitioners and recipients of P/CVE projects, which can have significant practical and ethical implications. A balance will largely depend on context-specificities but, where feasible, programmatic objectives and donor priorities should be shared with targeted beneficiaries using language and terminology that avoids suggestive, emotive or hard security-oriented connotations such as ‘radicalisation’ or ‘terrorism’.
The information and communications strategy should be determined by a range of stakeholders from the outset of the implementation stage so all relevant actors have a shared understanding. Different programming approaches will be adopted but it is vital practitioners understand and appreciate the perspectives of beneficiaries and recipient individuals/groups throughout the duration of the project’s life-span.

3.6. Evaluation including Lessons Learned and Close Down

It is generally observed that the domain of CT and P/CVE is under-evaluated and dominated by assumptions rather than evidence. At the same time, both CT and P/CVE face the difficulty of ‘specifying metrics sufficient to measure a negative outcome’. This makes the evaluation phase even more relevant as evaluation and feedback from both successes and failures is essential for building greater institutional knowledge.

It is important to take into account that there is considerable scepticism about the extent to which P/CVE programming in particular has to date delivered the desired results. With this concern in mind, it is necessary for P/CVE practitioners to pay greater attention to demonstrating programme performance in order to justify their budgets and to enhance our collective understanding of what works in this field.

While CT is a much more established field, there is nonetheless little by way of programme evaluation data in the public domain. Some steps to consider are included in the box below:

<table>
<thead>
<tr>
<th>Objectives</th>
</tr>
</thead>
<tbody>
<tr>
<td>• To assess the relevance, efficiency, effectiveness, impact and sustainability of actions and improve the effectiveness of ongoing projects and to take on board lessons learned.</td>
</tr>
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</table>

<table>
<thead>
<tr>
<th>Inputs</th>
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</thead>
<tbody>
<tr>
<td>• All relevant project documents, including planning, monitoring reports and financial documentation.</td>
</tr>
<tr>
<td>• Guarantee access to all key stakeholders including the target audience.</td>
</tr>
<tr>
<td>• ToR for the evaluation team.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Tasks</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Formulation of ToR for the evaluation.</td>
</tr>
<tr>
<td>• Supervise the evaluation execution.</td>
</tr>
<tr>
<td>• Make all documentation and key informants available to the evaluation team.</td>
</tr>
<tr>
<td>• Undertake regular interim evaluations and end-of-project evaluation.</td>
</tr>
<tr>
<td>• To consider:</td>
</tr>
<tr>
<td>• Effectiveness</td>
</tr>
<tr>
<td>• What were the achievements of the specific activity?</td>
</tr>
<tr>
<td>• How did these achievements relate to the impact?</td>
</tr>
<tr>
<td>• Did assumptions stand in the way?</td>
</tr>
<tr>
<td>• Did unintended or unforeseen side-effects influence the effect and achievements?</td>
</tr>
<tr>
<td>• What were specific achievements for specific target groups (woman, certain societal groups, youngsters, elderly, leaders, political players, traditional leaders, religious leaders, others)?</td>
</tr>
<tr>
<td>• Efficiency</td>
</tr>
<tr>
<td>• How do achievements relate to costs?</td>
</tr>
<tr>
<td>• Were there any alternative ways to get to similar achievements that would have come at lower costs?</td>
</tr>
<tr>
<td>• Has management contributed to the efficiency?</td>
</tr>
<tr>
<td>• Impact</td>
</tr>
<tr>
<td>• Were activities coherent and coordinated with other key stakeholders and other donors to optimize effect and impact?</td>
</tr>
<tr>
<td>• Did the activities impact on men and women in the same way?</td>
</tr>
<tr>
<td>• Sustainability</td>
</tr>
<tr>
<td>• How is continuation of project’s impact guaranteed?</td>
</tr>
<tr>
<td>• Should activities be continued or scaled up and is there reasonable guarantee that this will happen?</td>
</tr>
</tbody>
</table>

Outcomes

- An evaluation report including a summary, report of the observations, lessons learned and recommendations.
- Debrief of findings of the evaluation team with the project team.

Evaluation should be an inclusive process. It requires the involvement of all the main stakeholders involved in the execution and in the outcome of the project activities. The purpose of evaluation is to assess, against indicators selected during the formulation stage and results compared with baseline information, how successful the project has been in meeting its stated objectives, to reflect upon the relevance of project activities, to identify lessons learned in terms of impact, sustainability, effectiveness and efficiency, and to assess whether any lessons can be identified that are useful for next steps or for others working in the field of CT or P/CVE. It is also useful to take into account gender in evaluation processes to explore whether activities had the same impact on both men and women. Evaluation may take various forms such as rating scales, indexes, milestone indexes, scorecards, victim surveys, opinion polls, observed changes in behaviour, etc.

At the impact level, it is valuable to collect and exploit data on large-scale and gauge the long-term effects in the country or countries where the programme has been delivered. Impact data is difficult to judge, given three inter-related reasons:

1. The limited budgets that are generally available to implementers realistically preclude substantial changes at this elevated level.
2. Specific CT and P/CVE initiatives typically form single elements of far broader responses to VE, and the above indicators are more applicable to such system-wide efforts than they are to individual projects.
3. Crediting changes at the impact level is particularly difficult in light of the attribution problem (i.e. whether the intervention or some other factor caused the observed change to occur).

These issues reflect the need for constant monitoring to counteract some of these limitations.

Evaluating at the Outcome and Impact Levels:

As noted earlier, outputs are more easily measured in quantitative terms than outcomes and impact, for example:

- Numbers of participants in CT or P/CVE projects—such as the numbers of youths that participate in a youth sporting project or the number of border police trained in interviewing skills.
- Number of arrests or prosecutions.
- Numbers of products produced.
- Numbers of viewers of media content (TV shows, radio programmes, newspapers) that carry a P/CVE message.

Outcome indicators measure the impact of policies and measures on the realisation of the goals and objectives CT-P/CVE activities. A reduction in support for VE organisations and a reduction of violent behaviour will generally be the desired outcome. The defined intermediate steps during the project activity will differ accordingly. This can vary from reducing traction to the early identification of violent actors.

Indicators used to evaluate the outcomes of a P/CVE intervention can include changes in knowledges, skills and attitudes. For example:

- Changes in attitudes towards government and violent groups, measured by perception surveys before, during and after a project.

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107 The arguments provided in this section represent a substantial adaptation of the stance adopted in Khalil and Zeuthen, ‘A Case Study’, p. 3.
- Changes in attitudes about conditions, grievances and the means of addressing them through perception surveys before, during and after a P/CVE project.

- Number of individuals from targeted community who engage in planning of project activities.\(^\text{108}\)

- Changes in the percentage of targeted individuals who feel less marginalised.

For a CT intervention, indicators could include:

- Increased levels of knowledge of CT legislation among police.

- Number of CT cases in which terrorists were brought to justice and sentenced.\(^\text{109}\)

- Increased understanding of human rights norms among police and judiciary.

- Skills in using counter-terrorist finance (CTF) methods in police investigations.

- Ability to use forensic techniques (e.g. DNA collection) in CT cases.

**Examples\(^\text{110}\)**

If a CT programme has as a desired outcome of increasing state capacity to prevent VE, activities may include developing CT training courses for law enforcement and security officials in the country. The before/after indicators against which the programme should be judged may include the percentage of law enforcement and security officials who:

- Understand that terrorism and VE are motivated and enabled by multiple factors.

- Understand that there is no standard pathway to terrorism and VE.

- Acknowledge the potential negative effects of security force excesses.

- Understand the CT legal framework in the relevant location.

- Understand their obligations under the CT and human rights legislation.

- Have increased their skills and proficiency using counter-terrorist finance (CTF) methods in police investigations.

- Have increased their ability to use forensic techniques e.g. DNA collection.

In P/CVE projects, if an outcome is articulated in terms of a positive influence on the attitudes and behaviours of specific individuals identified as ‘at risk’, relevant indicators may include:

- Percentage of ‘at-risk’ individuals with gainful employment.

- Percentage of ‘at-risk’ individuals maintaining association with ‘radical’ institutions or individuals.

- Percentage of ‘at-risk’ individuals claiming that they would vote at next elections (if applicable).


\(^\text{110}\) Adapted from Khalil and Zeuthen (2016).
• Percentage of ‘at-risk’ individuals claiming to acknowledge the legitimacy of the government.

• Percentage of ‘at-risk’ individuals claiming to identify as citizens of the state in which they live.

• Percentage of ‘at-risk’ individuals claiming to be willing to befriend those from other religions.

• Percentage of ‘at-risk’ individuals understanding religious doctrines to be subject to a number of different interpretations (i.e. an ability to be critical).

• Percentage of ‘at-risk’ individuals claiming violence is not a legitimate expression of their religion.

Or if the intended impact of a specific P/CVE initiative is understood to be a reduction in violence and support for violent acts, straightforward indicators may include:

• Number of incidents of violence in location A across time B.

• Percentage of population supporting VE entities in location A across time B.

Close-down and Lessons Learned

Once the programme is completed and an evaluation of its impact carried out, there will need to be a decision regarding follow-up:

• Should the programme be continued, scaled up or

• Will it require a separate follow-up programme to build on its achievements?

• If follow up programming is necessary can funding be elicited from the same EU instrument or does there need to be a transition to alternative donor sources (via other EU instruments or EU Member States)?

Where necessary, there should also be consideration for whether or how programme participants may be supported after the programme ends:

• Are there other similar programmes they might join?

• Is there a need for follow-up support or monitoring?

Identifying lessons learned will be important to ensure that policies and practices can evolve based on the outcomes and experiences associated with the intervention. It can also enable adjustments where the project is not having the desired outcome or can capitalise on an approach that has a particularly good outcome.

Developing a communications package or presentation about the programme can help generate support from other partners or donors for similar activities, or create an opportunity to share lessons learned with key partners who may be developing similar programmes.
Example:
STRIVE Horn of Africa, monitoring and evaluation and lessons learned

STRIVE HoA explicitly integrated a pilot approach to its operations. As such, there was a consistent emphasis on research, monitoring and evaluation to extract lessons learned on an on-going basis, and conclusions were translated into actionable recommendations that were consequently incorporated into the design of STRIVE II.

STRIVE HoA delivered mentorship opportunities, in partnership with a local CSO, to vulnerable youth living in Majengo and Eastleigh, Nairobi. This was designed to reduce the readiness of young people to engage in political violence, especially those from deprived urban environments.

The selection criteria for potential beneficiaries targeted key ‘at-risk’ demographics including school dropouts, individuals involved in or associated with criminal activity, and recent converts of Islam.111

Both an internal review and external evaluation112 highlighted the mentorship scheme as the most effective vehicle for competing ‘in the same space’ as violent extremist groups, specifically in terms of its propensity to engage vulnerable individuals on a personal level. The pilot was particularly enhanced when mentors were contactable outside the course’s formally scheduled sessions, and recruiting practitioners known by the community helped reduce barriers to participation. Due to its promising results, it was recommended that this mentorship model be scaled up in any future CVE intervention.113

To this end, an expanded version of the mentorship scheme was launched in STRIVE II, incorporating 40 mentors across communities in Nairobi, Mombasa and the South Coast. This was accompanied with a revised selection framework involving robust capability criteria such as the availability of practitioners outside designated ‘office hours’, and a more systematic approach to diversifying the experience, background and profile of mentors. The mentor training course has also received additional content including multi-media resources and scheduled brainstorming sessions, and is expected to be supplemented with a series of newly established referrals committees compromising a cross-section of thoroughly vetted local stakeholders.114 These improvements should build on the preliminary outputs of STRIVE HoA and allow a more inclusive, comprehensive and rigorous pilot programme to be implemented.

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113 Strengthening Resilience to Violent Extremism (STRIVE) in the Horn of Africa: Lessons Learned, RUSI.

APPENDIX

Who is Who, Related to CT in Brussels?

Counter-terrorism is within the competence of the EU, although national security remains the sole responsibility of Member States under Article 4(2) of the Treaty on European Union. As such, a number of EU-organs are relevant to the funding, design and/or implementation of CT programming:

The EU Counter-Terrorism Coordinator
The office of the EU CT Coordinator was established in 2005, following the terrorist attacks in Madrid on 11 March 2004 and the European Council’s subsequent adoption of a declaration on combating terrorism. The CTC is in charge of:

• Coordinating the work of the Council in combating terrorism.

• Presenting policy recommendations and proposing priority areas for action to the Council, based on threat analysis and reports produced by the EU Intelligence Analysis Centre and Europol.

• Closely monitoring the implementation of the EU counter-terrorism strategy.

• Maintaining an overview of all the instruments at the European Union’s disposal, to regularly report to the Council and effectively follow up Council decisions.

• Coordinating with the relevant preparatory bodies of the Council, the Commission and the EEAS and sharing information with them on his activities.

• Ensuring the EU plays an active role in the fight against terrorism.

• Improving communication between the EU and third countries in this area.

The European Council reaffirmed the importance of the role of the counter-terrorism coordinator in the strategic guidelines for justice and home affairs (June 2014).

The European External Action Service (EEAS)
In regards to CT and P/CVE, the EEAS is responsible for defining external CT policies and priorities, for the programming of related activities at the macro level or the organisation of CT Political Dialogues with partner countries and representation of the EU in relevant multilateral fora. There is a dedicated CT Division within the Security Policy Directorate reporting to the Deputy Secretary General for CSDP and Crisis response. The CT Division closely liaises with other EEAS services as well as relevant European Commission services (notably DG DEVCO, DG HOME, DG NEAR and FPI) and the EU Counterterrorism Coordinator. Close coordination with Member States takes place within the framework of the Council Working Group COTER (Presidency-chaired).

The overall objectives of the EU’s external actions on counter-terrorism are:

• Political outreach notably through dedicated Counter-Terrorism Political Dialogues with like-minded countries (US, Canada, Australia and Schengen countries) and targeted and upgraded with EU neighbourhood countries.115

• Input to global counter-terrorism policy-making and coordination notably within the UN, GCTF, FATF, G7 Roma/Lyon Group and Global Coalition against Da’esh. The EU co-chairs the GCTF East Africa working group and supports key GCTF initiatives on rule of law (International Institute on Criminal Justice and

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Rule of Law in Malta) and countering violent extremism (Hedayah Centre, Abu Dhabi, Global Community Engagement and Resilience Fund (GCERF) in Geneva), both financially and as a board member.

- Establishment and implementation of specific EU counter-terrorism and P/CVE regional and country strategies/Action Plans with the MENA, WB and Turkey, also with a specific focus on the Sahel and the Horn of Africa.

- Implementing capacity building measures to support counter-terrorism efforts in third countries in coordination with key partners.

The EEAS works closely with the relevant services of European Commission (HOME, JUST, DEVCO and FPI), and its relevant agencies (including Europol/Eurojust/Cepol/ External Border Agency), to address the internal and external aspects of counter-terrorism programming. Furthermore, the EEAS manages the network of CT/security experts deployed in selected EU Delegations in priority countries that underpin this work.

**CT/Security experts**

EU CT/security experts deployed in selected EU Delegations in priority countries help build closer CT interaction with and between Member States on the ground, help liaise more effectively with host governments and relevant local authorities, provide analysis and help identify possible areas for additional CT assistance and projects. They assist in the preparation of CT Political Dialogues and the implementation of key conclusions.

**EU Intelligence and Situation Centre (EU INTCEN)**

The EU Intelligence and Situation Centre (EU INTCEN) is the exclusive civilian intelligence function of the EU. Its analytical products are based on intelligence from the EU Member States’ intelligence and security services. The Centre has been part of EEAS since 2011, under the authority of the EU’s High Representative. Its mission is to provide intelligence analysis, early warning and situational awareness to the High Representative, the EEAS, various EU decision making bodies in the fields of the Common Security and Foreign Policy, the Common Security and Defence Policy and Counter-Terrorism, as well as to the EU Member States. EU INTCEN does this by monitoring and assessing international events, focusing particularly on sensitive geographical areas, terrorism, the proliferation of weapons of mass destruction, and other global threats. The Centre is not an operational agency and does not have any collection capability. The operational level of intelligence is the Member States’ responsibility and it only deals with strategic analysis.

**The European Parliament**

As the only institution of the European Union directly elected by citizens, the European Parliament exercises three fundamental powers: legislative, budgetary and political control over satellite European institutions. Since the Lisbon Treaty, the Parliament plays a co-legislative role with the Council of the European Union on 85 areas, including security policies. This involves, for example, establishing new anti-money laundering rules to combat the financing of terrorism, criminalising the preparation of terrorist acts or adopting new rules about weapons control, and validating the reinforcement of Europol.

**The European Commission**

The Commission’s main role in the area of CT is to assist EU State authorities in carefully targeted actions and initiatives, primarily within the Prevent and Protect strands outlined in the Union’s Counter-Terrorism Strategy. When necessary, the Commission also supports EU States by approximating the legal framework, in full respect of the subsidiarity and proportionality principles. For example, Framework Decision 2002/475/JHA, which was amended in 2008, provides a common definition of terrorist and terrorist-linked offences. It is important to remember that all operational work is performed by EU States’ law enforcement and intelligence authorities.

The Commission has developed policies in all sectors related to the prevention of terrorist attacks and the handling of their consequences, e.g. in countering terrorist financing and in hindering access to explosives and to CBRN materials. The Commission is also responsible for the European Programme for the Protection of Critical Infrastructure and the EU-US Terrorist Finance Tracking Programme.

**Directorate-General for International Cooperation and Development (DG DEVCO)**

DG DEVCO is responsible for designing European international cooperation and development policy, and
delivering global aid through the implementation and monitoring of projects financed under the various EU instruments. The portfolio of projects implemented by DG DEVCO includes CT and P/CVE related projects.

The DEVCO services include a thematic unit (DEVCO B.5 – stability, security, development & nuclear safety) responsible for the implementation and management of the long-term component (‘Article 5’) of the Instrument contributing to Stability & Peace (IcSP). Under the long-term component there is a large-scale counter-terrorism (CT) programme, including activities and projects relating to P/CVE, countering the financing of terrorism and strengthening the rule of law (CT-related).

**Directorate-General for European Civil Protection and Humanitarian Aid Operations (DG ECHO)**
In addition to its overseas humanitarian aid activities, ECHO administers the EU Civil Protection Mechanism, which fosters cooperation among national civil protection authorities across Europe and facilitates coordination in response to natural and man-made disasters.

**Directorate-General for Migration and Home Affairs (DG HOME)**
As part of the Commission DG HOME plays a vital role in assisting Member States. One of its innovative initiatives is the establishment of the Radicalisation Awareness Network (RAN) in 2011. This European network of policy makers and practitioners in the area of P/CVE, has now been transformed into a Centre of Excellence (CoE) on Prevention of Radicalisation.

The CoE of the RAN also has an outreach element to a limited number of countries outside the EU. DG HOME set up, supports and manages the RAN. Nine working groups have attracted close to 2000 practitioners and experts, and provide opportunities to exchange information, knowledge and promising practices, producing deliverables that contribute to the countering of violent extremism. Best practices are peer reviewed. The RAN CoE therefore acts as a hub in connecting, developing and disseminating expertise. This includes fostering a dialogue between practitioners, policy makers and academics in an inclusive way. By doing so, the CoE develops state-of-the-art knowledge, and supports both the Commission and Member States. It also helps shape the Commission’s research agenda, and liaises with preventive initiatives inside and outside the EU. Similarly, since vulnerability to radicalisation does not stop at the Union’s borders, the Commission, including DG-Home, increasingly seeks to work with third countries to prevent radicalisation and allocate EU funding to train and support media and grass-root preventive initiatives.

**DG Justice and Consumers (DG JUST)**
DG JUST is responsible for EU policy on justice, consumer and gender equality. Regarding criminal justice, the EU has set up specific structures to facilitate mutual assistance and support cooperation between judicial authorities:

- **Eurojust**: an EU body comprising experienced judges or prosecutors who support and strengthen coordination and cooperation between national authorities in relation to serious crime.

- **European Judicial Network in Criminal Matters (EJN)**: a network of magistrates and prosecutors who act as contact points in EU countries to facilitate judicial cooperation.

Following the adoption of the EU Agenda on Security in 2015, the Commission ensures that laws to tackle racism and xenophobia, and those legislating equal treatment irrespective of racial or ethnic origin, are correctly enforced in and by Member States. It assesses any gaps in legislation, supports action to combat online hate speech, and assists Member States in developing proactive investigation and prosecution practices on the ground, while promoting the exchange of best practices and training to prevent radicalisation in prisons.

**Directorate-General for Neighbourhood and Enlargement Negotiations (DG NEAR)**
DG NEAR is responsible for the enlargement policy with the Western Balkans and Turkey and for the European neighbourhood policy with the Eastern and Southern neighbourhood.

**Service for Foreign Policy Instruments (FPI)**
The FPI is a Commission Service which works alongside the EEAS and is responsible for operational activities in the crucial area of EU external action, including projects in the field of the CT and P/CVE such as: implementing the Common Foreign and Security Policy (CFSP) budget; implementing crisis response
and prevention measures financed under the IcSP; implementing the Partnership Instrument, designed to promote the Union’s global strategic interests; implementing cooperation with industrialised countries (ICI); and preparing and implementing sanction proposals.

**Europol**

Europol (European policing centre) is based in The Hague, and acts as a support centre for law enforcement operations and expertise, and as a hub for information on criminal activities. It also integrates a range of analytical faculties, helping enrich information flowing from EU Member States and a number of third states.

**Eurojust**

Eurojust is also based in The Hague, dealing with judicial co-operation in criminal matters. It facilitates the execution of international mutual legal assistance and the implementation of extradition requests. It covers the same crimes as Europol, including terrorism, drug trafficking, trafficking in human beings, cybercrime, fraud, corruption, money laundering and other economic crime. The agency is not empowered to investigate or prosecute crimes, but works to coordinate investigations and prosecutions between the EU Member States when dealing with cross-border crime. They may also assist investigations and prosecutions between a requesting Member State and a non-Member State where a cooperation agreement exists or where there is special need.

**The EU Agency for Law Enforcement Training (CEPOL)**

CEPOL is an agency of the European Union, based in Budapest, dedicated to developing, implementing and coordinating training for law enforcement officials. Its mission is to facilitate cooperation and knowledge sharing among law enforcement officials of the EU Member States and to some extent, from third countries, on issues stemming from EU priorities in the field of security; from the EU Policy Cycle on serious and organised crime. CEPOL brings together a network of training institutes for law enforcement officials in EU Member States and supports them in providing frontline training on security priorities, law enforcement cooperation and information exchange.

**The European Security and Defence College**

The College aims to provide Member States and EU Institutions with knowledgeable personnel in Common Security and Defence Policy (CSDP) that are able to work efficiently by offering strategic-level education on CSDP matters.

**The European Satellite Centre**

The Centre, founded in 1992, is an EU agency, based near Madrid, since 2002. It supports the decision-making of the European Union in the field of the CSDP including crisis management missions and operations, by providing products and services resulting from the exploitation of relevant space assets and collateral data, including satellite and aerial imagery, and related services.

**Frontex: European Border and Coast Guard Agency**

Frontex promotes, coordinates and develops European border management in line with the EU fundamental rights charter and the concept of Integrated Border Management. Among a range of responsibilities it monitors migratory flows, conducts vulnerability assessments, manages external borders, coordinates joint operations and rapid border interventions, provides technical equipment for deployment operations, and has established pools of forced-return monitors, forced-return escorts and return specialists.

**Radicalisation Awareness Network (RAN)**

RAN was established by the European Commission’s Directorate-General for Migration and Home Affairs in 2011 to convene a range of different actors, from psychologists and educators to social workers, community leaders and probation officers alongside representatives from government ministries. The network provides opportunities for exchanging information, ideas and experiences, and facilitates the pooling of knowledge, cooperation and the identification of best practices for tackling radicalisation. RAN currently connects over 2,400 practitioners.  

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Trust Funds

Key priorities for the Trust Fund for Africa:117

1) Cultivating greater economic and employment opportunities by establishing inclusive economic programmes, especially for young people and women in local communities, with a focus on vocational training and creation of micro- and small enterprises. Some interventions will, for example, support foreign fighters after their return to their countries of origin.

2) Strengthening resilience of communities and in particular the most vulnerable, as well as refugees and displaced people. This includes resilience in terms of food security and of the wider economy, delivering basic services for local populations through community centres or other means of providing them with food and nutrition security, health, education, social protection, and environmental sustainability.

3) Improved migration management in countries of origin, transit and destination. Improving migration management in all its aspects in line with the Global Approach to Migration and Mobility, and the Rabat and Khartoum processes, including: contributing to the development of national and regional strategies on migration management; containing and preventing irregular migration and fight against trafficking of human beings; smuggling of migrants and other related crimes; effective return and readmission; international protection and asylum; legal migration and mobility; and enhancing synergies between migration and security.

4) Improved governance and conflict prevention and reduction of forced displacement and irregular migration.

Supporting improvements in overall good governance, promoting conflict prevention, addressing human rights abuses and enforcing the rule of law, including through capacity building in support of security and development, as well as law enforcement, such as border management and migration related aspects. Some actions will also contribute towards preventing and countering radicalisation and extremism.

Key priorities of the EUTF for Syria:118

1) Promoting educational, protection and engagement opportunities for children and young people in line with the ‘No Lost Generation’ initiative.

2) Reduce the pressure on countries hosting refugees by investing in livelihoods and social cohesion and supporting them in providing access to jobs and education that will benefit both refugees and host communities.

Key priorities for the Trust Fund for Central African Republic:119

1) Restore essential public services (e.g. electricity, transport, access to justice and access to water) and basic social services (health and education), and stabilise the food and nutrition situation.

2) Revive economic activity.


3) Stabilise the country and restore the social fabric, in particular through reconciliation, peaceful
coexistence between the communities of CAR and respect for human rights.

4) Re-establish the legitimacy, rebuild capacity and restore the operation of national and local
administrative structures.
## An Example of a CFT/AML Log Frame (Formulation Stage)

### CFT/AML LOGICAL FRAMEWORK

<table>
<thead>
<tr>
<th>General objective</th>
<th>Objectively verifiable indicators (quantitative and qualitative)</th>
<th>Sources of verification for the delegated entity</th>
<th>Assumptions/risk</th>
</tr>
</thead>
</table>
| **Cut off terrorist access to funding and introduce enhanced measures against serious organized crimes in specific regions (MENA, SEA) through support to increase compliance with Financial Action Task Force (FATF) recommendations and relevant UNSCRs** | Improved national capacity in terms of identification and seizure of terrorist assets:  
- Increased Compliance with United Nations Security Council Resolutions on the prevention and suppression of terrorism and terrorist financing  
- Increased compliance with FATF recommendations  
- Improved FATF evaluation of countries’ administration  
- Increased number of risk assessments  
- Stronger NGO and private sector participation in CFT/AML initiatives |  
- FATF evaluations  
- Central bank reports | Identified beneficiaries are willing to see the project succeed. |
| **Enhance national and regional AML/CFT capacities by addressing the gaps on a multidimensional perspective.** | • In relation with local partners, specific needs are identified  
• Activities corresponding to pre-identified needs are set up  
• Number of agencies and institutional bodies involved  
• Number of attendees present in trainings  
• Number of stakeholders and exterior partners involved in the design and execution of training  
• Number of preventive measures taken |  
- Reports  
- FATF evaluations | Political and operational willingness |
| **Increase national, regional and international cooperation by supporting or creating networks and partnerships.** | • Exchange between CFT/AML institutions  
• Presentation of CFT/AML cases and exchanges of best practices  
• Stronger involvement of local partners in FATF Style Regional Bodies (FSRBs) and other CFT/AML relevant institutions  
• Local partners involved in Mutual evaluations  
• Engagement of civil society / private sector is bolstered |  
- Reports  
- FATF evaluations | Political and operational willingness |
### RESULTS

<table>
<thead>
<tr>
<th>Objectively verifiable indicators (quantitative and qualitative)</th>
<th>Sources of verification for the delegated entity</th>
<th>Assumptions/risk</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Result 1</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
| 1.A National, regional asset recovery mechanisms are improved to reinforce the AML/CFT instruments available at a national and regional level | • Compliance with FATF Special Recommendations  
• Implementation of targeted financial sanctions (UNSCR)  
• Financial institutions are legally required to undertake customer due diligence  
• Support to legislation drafting is implemented where necessary  
• Number of meetings held at the regional level  
• Number of trainings at local and regional levels  
• Number of attendees  
• Improved participation in regional asset recovery networks | • FATF recommendation 4 & 38  
• Legal publications  
• Implementation of new asset recovery mechanisms  
• Signature of information sharing agreements  
• Publication of successful asset recovery cases | Willingness of national administrations to cooperate with project team and to share potentially sensitive information at regional levels. |
| **Result 2**                                                  |                                                  |                  |
| 1.B AML/CFT penal chain mechanism are improved | • Specialised instruments such as integrated software are offered  
• Financial investigation methods are presented  
• Equipment needs are identified and addressed  
• Practical trainings including SOPs, improved FIU workflows are made available  
• National risk assessments are conducted (global or sector specific)  
• Inter-administrative operational cooperation on AML/CFT cases is reinforced  
• Enhanced central bank control on reporting entities | • Contract of acquisition of instruments  
• Reports originating from the central bank  
• FATF recommendation 3 & 20  
• Progress reports | Willingness of the penal chain actors to cooperate with project team, especially during the inception phase in order to evaluate correctly their needs. A certain degree of openness is guaranteed in order to address functional issues in the most efficient way. |
<table>
<thead>
<tr>
<th>Result</th>
<th>Description</th>
<th>Activities</th>
<th>Recommendations</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.C</td>
<td>National and regional measures have been taken to reduce the opportunities for financial flows through the informal economy and from organised crime to terrorist organisations</td>
<td>• Criminalisation of money laundering on the basis of the Vienna Convention(^{120}) and the Palermo Convention(^{121}) • Number of typology exercise held • Specific financial sectors are identified, mapped and evaluated through a risk based approach • Non specialised law enforcement units are trained/informed on CFT/AML issues</td>
<td>• Progress reports • FATF recommendation 1 &amp; 16</td>
<td>Willingness of the private sector to cooperate with law enforcement in order to reduce the permeability of financial flows between the formal and informal sector. Ability and willingness of local law enforcement to tackle the informal economy linked to terrorist organisations.</td>
</tr>
<tr>
<td>2.A</td>
<td>Inter-regional asset recovery mechanisms are improved</td>
<td>• Support to the creation of expert networks is given • CARIN type asset recovery networks are developed • Increased information sharing at a regional level • Workshops underlining the importance of regional cooperation are organized</td>
<td>• FATF recommendation 5 • Progress reports</td>
<td>Willingness at national levels to invest in, and cooperate with, at transnational and regional levels.</td>
</tr>
<tr>
<td>2.B</td>
<td>National, regional and international cooperation in relation to organised crime and terrorism have been increased</td>
<td>• Number of regional and international meetings • Exchanges of best practices are held • Common exercises and trainings are organised</td>
<td>• Training reports • Reporting from component leader</td>
<td>Political and operational willingness of local authorities and agencies.</td>
</tr>
<tr>
<td>2.C</td>
<td>Cooperation with civil society and the private sector have been increased</td>
<td>• Workshops are organised • Reporting processes are improved • Risk assessments’ frequencies increased</td>
<td>• FATF evaluations • Published central bank evaluations • Workshop minutes</td>
<td>Openness of local authorities and law enforcement to the importance of the private sector and civil society in CFT/AML matters. Willingness of private sector, civil society to cooperate with authorities.</td>
</tr>
</tbody>
</table>

\(^{120}\) The United Nations Convention against Illicit Traffic in Narcotic Drugs and Psychotropic Substances, 1988.
## PROJECT SET-UP AND MANAGEMENT

<table>
<thead>
<tr>
<th>Activities</th>
<th>Objectively verifiable indicators (quantitative and qualitative)</th>
<th>Sources of verification for the delegated entity</th>
<th>Assumptions/risk</th>
</tr>
</thead>
</table>
| **0.A.1 Gap analysis and state of the art** | • National PoCs/counterparts are identified in the pilot zone (one per country) and beyond (if possible)  
• Identification of their capacities and evaluation of their processes  
• Evaluation of regional AML/CFT cooperation  
• Identification of principal beneficiary countries  
• Identification of potential pilot project | • List of national PoCs/relevant counterparts for the pilot zone  
• List of national PoCs/relevant counterparts out of the pilot zone | Needs are effectively expressed by partner countries. |
| **0.A.2 Definition of a work plan** | • Based on the gap analysis, a coherent and scaled work plan shall be designed in order to organize and plan activities throughout the project’s span. | • Reporting from delegated entity | Effective identification of needs and ability to address them with available and adequate technical expertise. |
| **0.A.3 Validation workshop** | • Presentation of, and agreement on, the work plan and programmed activities to beneficiaries | • Workshop report | |

*Note: PoCs* - Point of Contact
### 0.B Project management

#### 0.B.1 Set up a detailed overall project implementation plan
- Project managers are identified to administer the project,
- Specific trainings and awareness activities are designed
- Trainers are identified

#### 0.B.2 Review and confirm project activities implementation plan
- Validation of implementation plan

#### 0.B.3 Set up a project cross-cutting issues awareness and vigilance plan
- A specific plan is drafted to tackle gender, environmental, good governance, human rights and conflicts reduction, youth and minorities challenges within the project

#### 0.B.4 Define and conduct a comprehensive communication strategy
- Constant and relevant communication is upheld throughout the project span

#### 0.B.5 Define and implement an independent monitoring and evaluation strategy
- Strategy is devised and evaluation conducted

#### 0.B.6 Ensure proper management and steering of project activities
- Management structure will be set up in such a way as to ensure an effective coordination of complex tasks and to deliver the results up to standard and in line with the approved work plan.

### ENHANCE AML/CFT NATIONAL AND REGIONAL CAPACITIES BY ADDRESSING THE GAPS ON A MULTIDIMENSIONAL PERSPECTIVE

<table>
<thead>
<tr>
<th>Results</th>
<th>Activities</th>
<th>Objectively verifiable indicators (quantitative and qualitative)</th>
<th>Sources of verification for the delegated entity</th>
<th>Assumptions/risk</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.A.1</td>
<td>Support countries to enhance their asset recovery and management legislation</td>
<td>Development and support of a coherent and comprehensive legislation</td>
<td>Compliance with FATF recommendation 5</td>
<td>Political willingness</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Existence of asset recovery / management specialised administrations</td>
<td>Reporting from component leader</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>National legal publications</td>
<td></td>
</tr>
<tr>
<td>1.A.2</td>
<td>Improve capacities of local asset recovery agencies and the asset management offices</td>
<td>Authorities have the means necessary in order to proceed to freeze and seize property</td>
<td>Training reports</td>
<td>Political willingness</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Exercises and trainings successfully conducted</td>
<td>Catalogue offer</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>National agencies and offices invited to share best practices at a regional level</td>
<td>FATF guidelines and recommendations</td>
<td>Openness in order to optimize training efficiency</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Number of people trained</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
| 1.B.1 Provide support to Financial Intelligence Units (FIUs) to enhance their effectiveness | • Delivery of instruments and tools (software)  
• Trainings and workshops conducted  
• Number of attendees  
• Exchange of best practices  
• Increased compliance with FATF recommendations | • Compliance with FATF recommendation 29  
• Compliance with Egmont Principles for Information Exchange (…)  
• Training reports  
• FATF guidelines and recommendations | Political willingness  
Openness in order to optimize training efficiency  
Availability of experts |
| --- | --- | --- | --- |
| 1.B.2 Provide support to increase the effectiveness of financial investigation in the law enforcement agencies | • Number of trainings and workshops conducted  
• Case studies underlying the importance of interagency cooperation are presented  
• Number of attendees  
• Exchange of best practices | • Training reports | Mobilisation of stakeholders  
Availability of experts |
| 1.B.3 Provide support to increase the effectiveness of the judicial and prosecution components | • Number of trainings and workshops conducted  
• Number of attendees  
• Exchange of best practices  
• Technical assistance is implemented | • Number of trainings and workshops conducted  
• Number of attendees  
• Exchange of best practices  
• Technical assistance is implemented | Mobilisation of stakeholders  
Availability of experts |
| 1.B.4 Provide support to improve central bank’s and regulatory bodies’ effective AML/CFT supervision of reporting entities | • Trainings and workshops conducted  
• Number of attendees  
• Exchange of best practices | • FATF guidelines and recommendations  
• Regulatory reports published by local central bank | Effective central bank authority over reporting entities |
| 1.B.5 Support countries to enhance their CFT/AML and asset recovery legislation | • Legislative basis is improved and complemented  
• Assistance to drafting improved legislation is provided | • National legal publications  
• Reporting from component leader | Political and operational willingness |
1.C National and regional measures have been taken to reduce the opportunities for financial flows through the informal economy and from organised crime to terrorist organisations

### 1.C.1 The identification of opportunities for illegal financial flows is encouraged
- Typology exercises are held
- Industry-specific risk assessments are conducted
- Training reports
- Publication of risk assessment

**Willingness of beneficiaries and stakeholders to cooperate with project team**
- Ability to investigate specific aspects of the informal economy

**Ability to investigate specific aspects of the informal economy**
- Typology exercises are held
- Industry-specific risk assessment

### 1.C.2 Strengthen borders and trans border controls
- Training of customs officials (ie beneficial ownership)
- Technical assistance implemented
- Number of trainees
- Number of administrations included in the training

**Training reports**
- Political and operational willingness to cooperate

### 1.C.3 Produce guidelines and best practices on combatting illicit trafficking and its use for terrorist financing (e.g. cultural goods, wildlife and human trafficking...)
- Permeability between illicit trafficking and terrorism financing is evaluated
- Traffic-specific risk is assessed

**Publication of guidelines**
- Ability and willingness to cooperate on a technical aspect

---

### INCREASE NATIONAL, REGIONAL AND INTERNATIONAL COOPERATION BY SUPPORTING OR CREATING NETWORKS AND PARTNERSHIPS

<table>
<thead>
<tr>
<th>Results</th>
<th>Activities</th>
<th>Objectively verifiable indicators (quantitative and qualitative)</th>
<th>Sources of verification for the delegated entity</th>
<th>Assumptions/risk</th>
</tr>
</thead>
</table>
| 2.A.1   | Create expert networks | • List of cooperation activities are available  
• Frequency of technical regional meetings | • Reports  
• Compliance with regional asset recovery recommendations | Political will and technical engagement at a regional level |
| 2.A.2   | Develop and support CARIN type asset recovery network in each region | • Support to the creation of expert networks is given  
• CARIN type asset recovery networks are developed  
• Increased information sharing at a regional level  
• Workshops underlining the importance of regional cooperation are organized | • Progress reports | Willingness at national levels to invest in, and cooperate with, at transnational and regional levels. |
<table>
<thead>
<tr>
<th>2.B National, regional and international cooperation in relation to organised crime and terrorism have been increased</th>
<th>2.B.1 Facilitate cooperation between national and regional institutions</th>
<th>2.C.1 Facilitate cooperation between the institutional/public/private sector</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>• Enhanced compliance with and implementation of relevant international conventions</td>
<td>• Assessment of civil society’s engagement in AML/CFT issues</td>
</tr>
<tr>
<td></td>
<td>• Treaties, arrangements, MoUs or other mechanisms supportive of an enhanced cooperation are set up</td>
<td>• Establishment of Not-For-Profit Organisations (NPOs) specific policies in matters of CFT/AML issues</td>
</tr>
<tr>
<td></td>
<td>• Mutual assistance is offered whenever necessary or possible</td>
<td>• Number and frequency of meetings</td>
</tr>
<tr>
<td></td>
<td>• Wherever possible or necessary, harmonisation of legal terminology between institutions is implemented</td>
<td>• Trainings designed to include civil society/private sector in AML/CFT issues are offered</td>
</tr>
<tr>
<td></td>
<td>• Reinforced capacity to respond to requests</td>
<td>• FATF recommendation 8122</td>
</tr>
<tr>
<td></td>
<td>• Number and frequency of interagency and international technical meetings</td>
<td>• Risk based analysis of NPO and private sector</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Academic research on CFT/AML information sharing with NPOs</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Training reports</td>
</tr>
</tbody>
</table>

Political will and technical engagement at a regional level

| | | Political will of authorities to engage with civil society (potential contestants) |
| | | Engagement of civil society and cooperation of private sector |

122 Countries should review the adequacy of laws and regulations that relate to non-profit organisations which the country has identified as being vulnerable to terrorist financing abuse. Countries should apply focused and proportionate measures, in line with the risk-based approach, to such non-profit organisations to protect them from terrorist financing abuse, including: (a) by terrorist organisations posing as legitimate entities; (b) by exploiting legitimate entities as conduits for terrorist financing, including for the purpose of escaping asset-freezing measures; and (c) by concealing or obscuring the clandestine diversion of funds intended for legitimate purposes to terrorist organisations. From ‘Recommendation 8’, Global NPO Coalition on FATF. Available at: www.fatfplatform.org/recommendation-8/.
### Check list questions for the PCM

#### PROGRAMMING

**Objectives:** Establish the need for EU support to CT or P/CVE activities at regional or country level and identify the strategic approach to CT and P/CVE at regional or country level

<table>
<thead>
<tr>
<th>Key Question</th>
<th>Relevance</th>
<th>Actions</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Analysis of the political, economic and social situation including the security situation</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
| Is there a conflict ongoing? | Conflict-affected environments where VE groups are active and widespread pose particular challenges to CT and P/CVE activities particularly if the government is carrying out operations focused on challenging or eliminating VE militant groups. | • Consult relevant analyses and documents such as UNDP, the UN's CTED, ICG.  
• Consult EU CT/Security experts.  
• Organise consultation workshops if necessary.  
• Engage in policy dialogue with partner countries or regions. |
| Are there societal tensions or divisions; minorities; inter- or intra-religious tensions or specific incidents between groups; are there any isolated or parallel societies; are there any events, such as elections, that could trigger tensions or divisions? | Indications of or even a perception of exclusion of societal groups, regions, minorities etc. may give rise to VE organisations. Certain trigger events/elections may spark societal tensions or polarisation that justify targeted EU CT-P/CVE activities. | • Assess the security situation and the threat picture.  
• Review existing CT-P/CVE approach and relevant policies in the region and/country among the government, broader society.  
• Consult relevant analyses and documents such as UNDP, the UN's CTED, ICG.  
• Consult EU CT/Security experts.  
• Organise consultation workshops if necessary.  
• Engage in policy dialogue with partner countries or regions. |
| What is the legal and policy frameworks in relation to CT and P/CVE? Are the 19 UN CT conventions and resolutions ratified and translated into national legislation? Does the country have a P/CVE Strategy? | Existing laws (and to what extent these are put into practice) are relevant for determining the efficiency and effectiveness of CT. These include, but are not limited to, anti-money laundering and other FATF inspired measures to counter the financing of terrorism. The implementation of these international norms indicates the extent to which the government complies with internationally accepted CT measures. This includes taking into account human rights. A P/CVE strategy can indicate that the government is already considering a more holistic approach to CT. | • Consult with Ministry of Justice, UNODC and relevant national or international judicial and security bodies.  
• Consult with the EU's CT/Security Experts. |
<table>
<thead>
<tr>
<th>Key Question</th>
<th>Relevance</th>
<th>Actions</th>
</tr>
</thead>
<tbody>
<tr>
<td>What are major gaps and weaknesses in the response mechanism to VE?</td>
<td>The gaps or weakness of the existing approaches to VE from government or non-government actors will serve as a basis for strategic choices in CT-P/CVE.</td>
<td>• Draw on the expertise of EU CT/Security Experts.</td>
</tr>
<tr>
<td></td>
<td>If governments are employing overly aggressive CT policies, it may be wise not to consider building CT capacity, which can create grievances that leads to or increases VE.</td>
<td>• Consult with security and justice ministries about the coordination and inter agency cooperation and their efficiency, crucial for the success of a potential programme.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Seek out in NGO’s or UN reports about the situation of human rights (notably UPR report if accurate).</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Consult the Operational Human Rights Guidance for EU external cooperation actions addressing Terrorism, Organised Crime and Cybersecurity: Integrating the Rights-Based Approach.</td>
</tr>
<tr>
<td>Are human rights “suffering” from the implementation of special security measures?</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Policy objectives of the partner country**

| How is terrorism defined by the partner country? | Definition of terrorism may differ from international standards and may be politicised. Discrepencies between official policies and reality may exist. | • List the national agencies and other actors responsible for CT-P/CVE and from whom information can be obtained on existing CT-P/CVE policies and strategies. |
| How is VE defined? | VE may be defined more broadly as extremism, and used to clamp down on political opposition or other opponents. | • Consult with relevant government agencies and assemble strategic and policy documents. |
| | | • Consult with human rights organisations, ICRC, UN, other INGOs and CSOs about the government policies and the impact of these policies, notably on human rights. |
| | | • Consult with the EU’s CT/Security and human rights experts. |

**Effectiveness of Security and Justice Sector**

<p>| Are the army, police and justice professionals equipped and trained for the job? | These facts can give an (contra-) indication of the need for EU assistance. | • Check if there are recent specific studies or other documents related to Security or Justice Sector and consult with agencies and experts. Consult EU Delegations rule of law experts. |
| Is the government involved in international fora like the Global Counter Terrorism Forum, UN and Financial Action Task Force? | This is indicative for the position and the role of host government in international efforts on CT issues and can assist the Delegation to make strategic choices for EU support. | • If SSR or Justice reform projects have been previously implemented in the country / region, enquire about evaluation report. |
| | | • Consult with representatives of the UN and Ministry of Finance and Ministry of Foreign Affairs on representation in the international fora mentioned. |
| | | • Check with UN CTED (Counter terrorism committee) whether a (recent) country analyse has been done. |</p>
<table>
<thead>
<tr>
<th>Key Question</th>
<th>Relevance</th>
<th>Actions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Are there international developments that should trigger concerns in the security domain?</td>
<td>Attacks in neighbouring states in combination with porous borders (plus military action in neighbouring states) may precede a threat in the country.</td>
<td>• Consult EU Delegations in neighbouring states, situation reports from think tanks and UN and EU CT/Security experts.</td>
</tr>
<tr>
<td>Are foreign fighters returning to the country?</td>
<td>Foreign fighters pose a particular risk and require a careful response.</td>
<td></td>
</tr>
<tr>
<td><strong>EU engagement in CT-P/CVE</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>What is the EU policy regarding relevant sectors in CT-P/CVE?</td>
<td>Relevant EU policies on CT-P/CVE already exist and should be taken into consideration at this stage in order to make sure that any further EU assistance enters in the scope of already formulated policies.</td>
<td>• Relevant EU policies on CT-P/CVE already exist and should be taken into consideration at this stage in order to make sure that any further EU assistance enters in the scope of already formulated policies.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Integrating CT-P/CVE activities into existing programmes may be an option if the activities in those sectors can be modified to target the audiences and regions vulnerable to the call of VE organisations.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Review current EU policies on CT-P/CVE.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Review national and regional development plans.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Consult the EU brochures/documents mapping EU initiatives in the field of CT-P/CVE (for example, the publication “STRIVE (Strengthening Resilience to Violence and Extremism) for Development, Brussels 2015” which gives already a list of EU initiatives in the field.)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Seek out evaluation reports on CT-P/CVE activities by the EU in countries of the region of interest.</td>
</tr>
<tr>
<td>Are existing sectoral activities focusing on the regions or groups in society that are concerned with the security issues?</td>
<td>Integrating CT-P/CVE activities into existing programs may be an option if the activities in those sectors can be modified to target the audiences and regions vulnerable to the call of VE organisations.</td>
<td>• Consult with the relevant Heads of Sections within the Delegation.</td>
</tr>
</tbody>
</table>
# IDENTIFICATION

**Objectives:** to identify the CT-P/CVE needs of the context to understand the factors of VE and the government capacity to respond to the threat

<table>
<thead>
<tr>
<th>Key Question</th>
<th>Relevance</th>
<th>Actions</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Is there sufficient political space and support for the proposed activity?</strong></td>
<td>Given the nature of the issue, the political environment is crucial to take into account.</td>
<td>• Policy dialogue with government and key stakeholders on the political aspects and sensitive issues is key. • Check local CT legislation to identify the extent to which the necessary room for actors to respond to VE challenges is guaranteed.</td>
</tr>
<tr>
<td><strong>What are the factors of VE?</strong></td>
<td>A P/CVE activity should be designed in response to the factors of VE and targeted at those who are ‘at risk’ or vulnerable.</td>
<td>• Conduct analysis in relation to the structural, individual, group and enabling factors of VE and resilience. • As part of the needs assessment, conduct research on the factors of VE, intra-country variation and gender differences in factors will also need to be taken into account. • Consult closely with local governments and other institutions involved in CT-P/CVE. • Where necessary conduct fieldwork research. • Develop a theory of change.</td>
</tr>
<tr>
<td><strong>What is the current threat of terrorist or VE groups and what is the government’s capacity to respond?</strong></td>
<td>Any CT activity should contribute to building institutional capacity to address security issues more effectively. Specific institutional weaknesses can be addressed, and institutional potential built on.</td>
<td>• As above, but analysis should focus on looking at capacity gaps in security and justice institutions to determine where support could be provided. • Develop a theory of change.</td>
</tr>
<tr>
<td><strong>Is there a current conflict ongoing or a past one that could recur?</strong></td>
<td>CT-P/CVE activities can have an impact on peace and conflict dynamics.</td>
<td>• Consult the Addressing Conflict, Prevention, Peacebuilding and Security Issues Under External Cooperation Instruments: Guidance Note.</td>
</tr>
<tr>
<td><strong>Does the proposed project respect local history, relations, culture and narratives?</strong></td>
<td>CT-P/CVE activity need to be sensitive to specific local cultural approaches, to have a chance to be successful. Local participation can result in more ‘organic’ CT-P/CVE initiatives that draw on local traditions and actors.</td>
<td>• Consult EU institutions, media reporting, reports and analyses by civil society, think tanks, the UN etc. • Where possible, include local audience members to design and develop P/CVE content that resonates with their concerns and their communities.</td>
</tr>
<tr>
<td>Key Question</td>
<td>Relevance</td>
<td>Actions</td>
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<td>--------------</td>
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</tr>
<tr>
<td><strong>Policy objectives of the partner country</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
| What national and regional security priorities have been identified? | A CT-P/CVE strategy that addresses the real needs in security areas, identified by stakeholders themselves, is likely to gain good support if in line with problem analyses. | • List the priorities identified by national and regional (if relevant) stakeholders themselves and check against the proposed activity.  
• Regional and National Indicative Programmes should provide guidance. |
| Who are the key stakeholders for CT and P/CVE? Are they in agreement with/supportive of the activities? | It is important to explore their goals, positions, capacities and relationships. Government cooperation is necessary to CT and P/CVE interventions.  
Public and community support is necessary to P/CVE interventions. | • Context analysis should include mapping of key stakeholders building on the identification of stakeholders in the programming stage.  
• Consult with key stakeholders. |
| Does sufficient capacity exist to support CT-P/CVE activities? | The principle of ownership is crucial for the success of a CT/CVE activity that can be imported from outside. | • Ensure that identified activities are realistic within the context of local capacity. Consider specifically identifying activities to strengthen local capacity where appropriate. |
| **EU’s co-operation objectives in CT/P-CVE** | | |
| Does the EU fund activities on CT-P/CVE in the country or region? | This may be inspiration for further EU assistance and is also important for leveraging existing synergies. | • Consult the EU brochures/documents mapping EU initiatives in the field of CT-P/CVE (for example, the publication “STRIVE (Strengthening Resilience to Violence and Extremism) for Development, Brussels 2015” which gives already a list of EU initiatives in the field.)  
• Seek out evaluation reports on CT-P/CVE activities by the EU in countries of the region of interest. |
| Are there CT-P/CVE activities taking place financed by other donors (including MS)? | Potential for intensification, coordination or taking lessons learned from previous experiences for future EU assistance. | • Review partner government CT and P/CVE strategies and policies.  
• Review international commitments on CT-P/CVE. |
| Is the proposed activity in accordance with EU policy and with the outcomes of programming exercise? | Project manager has to make sure that any further EU assistance enters in the scope of already formulated policies and of the outcomes of the analysis made at the previous stage. | • Review the proposed activity against EU policies and international commitments.  
• Review against Regional and National Indicative Programmes. |
<table>
<thead>
<tr>
<th>Key Question</th>
<th>Relevance</th>
<th>Actions</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Overview of past and ongoing EC cooperation (lessons and experience), information on programmes of EU Member States and other donors</strong></td>
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</tr>
</tbody>
</table>
| To what extent does this new activity build on the lessons learned from earlier or ongoing activities? | To ensure a maximum impact, a CT-P/CVE project should support other existing or planned initiatives and be built on lessons learnt from previous projects. It is important to identify synergies and not duplicate activities. | • During context analysis, map the EU, MS and other actors’ past, current and planned CT and P/CVE interventions in the country.  
• Gather information on evaluations of earlier programmes in the region or projects on CT-P/CVE that have been implemented and that may be being implemented and see how link with them. |

**FORMULATION**

Objectives: To formulate components of a CT-P/CVE project (s) for support by EC cooperation

<table>
<thead>
<tr>
<th>Key Question</th>
<th>Relevance</th>
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<tbody>
<tr>
<td>Is the given project relevant?</td>
<td>CT-P/CVE programmes must closely match the problem identified. Activities have to closely match the reality of the local situation.</td>
<td>• Shortlist programme components by listing factors of VE identified (for P/CVE projects) or the weaknesses or capacity gaps in government related security and justice institutions (for CT projects). Candidate responses that correspond to these factors can then be identified.</td>
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<tr>
<td>Is there a clearly defined relation between the formulated activity and the government's actions in CT-P/CVE?</td>
<td>Effectiveness and durability in CT and P/CVE can only be attained if all actors work together and in the same direction.</td>
<td>• Check the project activity against government actions in the area of CT-P/CVE.</td>
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<tr>
<td>Do the project activities promote intensified or improved relations between government and citizens?</td>
<td>The public support for government actions in CT-P/CVE and the creation of a trust base has proven to be of crucial importance in effective and durable CT and P/CVE efforts.</td>
<td>• Check project activities.</td>
</tr>
<tr>
<td>Has the activity taken into account gender?</td>
<td>Men and women may experience VE differently and may engage with VE groups in different ways. They may also play different roles in CT-P/CVE programmes/projects.</td>
<td>• Consult with male and female stakeholders.</td>
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</table>
| Is the project design such that it promotes inclusion on all levels. Political, social, economic, gender, age, ethnic and religious. | Exclusion is often a driver for political violence. | • Check the project design (plus implementation) on a permanent basis.  
• Employ a conflict sensitive approach. |
### IMPLEMENTATION

**Objectives**: Efficiently execute, manage/implement and monitor a CT-P/CVE project

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<td><strong>Risk management</strong></td>
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<tr>
<td>Is there a risk VE individuals or groups might target the activity?</td>
<td>It is important to take into account any risk to implementers.</td>
<td>• Check the activity planning and the build-in-feedback mechanisms.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Create systems for security and other protective measures.</td>
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<tr>
<td>Are there any signs of unforeseen (side) effects?</td>
<td>Negative side effects can weaken or even jeopardise the all project.</td>
<td>• Evaluate their strength, impact and extend. Check with the risks foreseen and apply the mitigation measures that were defined if still valid. If not, adapt these measures.</td>
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<tr>
<td><strong>Project management</strong></td>
<td></td>
<td></td>
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<tr>
<td>What is the impact of the activity?</td>
<td>Activities may have a (positive) effect that are unrelated to the objective. Activities that have an adverse effect may need to be modified.</td>
<td>• Ensure regular monitoring to take into account planned and unforeseen impacts.</td>
</tr>
<tr>
<td>Is there a clear plan of action?</td>
<td>This is a key document for the follow-up of implementation and to share the tasks.</td>
<td>• Prepare a plan of action with the stakeholders involved.</td>
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### EVALUATION AND CLOSE DOWN

Objective: To assess the relevance, efficiency, effectiveness, impact and sustainability of actions and improve the effectiveness of ongoing projects and take on board lessons learned

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<td><strong>Phasing out</strong></td>
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<td>Does the activity require follow-up or continued activities?</td>
<td>Some ‘standalone’ activities do not require a follow-up. Either because it is self-propelling or because the activity results in a outcome that has a direct and unique impact.</td>
<td>• Check if the activity design is such that there is a need for follow-up.</td>
</tr>
<tr>
<td>Is a management system in place to continue activities?</td>
<td>If the activity does require follow-up, some form of a management system to ensure continuation is required.</td>
<td>• Seek to guarantee that the system is built in.</td>
</tr>
<tr>
<td>Can lessons learned be shared?</td>
<td>Drawing lessons is one thing but getting these lessons known to others is more important.</td>
<td>• Plan a system of outreach for lessons learned.</td>
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<td>What relevance does the activity have for other environments?</td>
<td>Consider the option of adaptation in similar environments.</td>
<td>• Plan the outreach of success and ensure adaptation through multilateral or bilateral channels.</td>
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<p>| <strong>Policy Context</strong> | | |
| Does the activity have implications for regional or local policies? | CT-P/CVE activities can also have implications for regional or local policies. | • Consider involving those involved in regional, district or local policy formulation in the evaluation process. Circulate the results of the project and the policy implications widely. |</p>
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| Is the project contributing to EU development goals?                         | EU CT-P/CVE policies are changing. As more experience is gained in supporting CT-P/CVE, lessons will be learned that will influence and change policy toward CT-P/CVE.                                           | • Evaluations should consider the achievements of CT-P/CVE projects in the light of EU policy directions.  
• Include new EU policy directions, where relevant, CT-P/CVE project evaluation. |
| Objectives                                                                   |                                                                                                                                                                                                          |                                                                                                                                                                                                         |
| Has the project achieved success according to the indicators set out in the plan? | Evaluations should look at achievements but also challenges. Success in this area is sometimes hard to measure due to the attribution problem.                                                              | • Use the plan of action log-frame or results framework as the foundation of the evaluation process.                                                                                                     |
| Has the project contributed to local capacity development?                    | CT-P/CVE projects can also build local capacity. This may be a direct focus or an indirect component.                                                                                                         | • Include criteria for local capacity development in the evaluation criteria.  
• Consider both formal and informal skills transfer that may have taken place.                                                                                                                           |
| Financial Sustainability                                                      | Financial performance targets are set at the start of the project and are important indicators of project performance.                                                                                     | • Include the project financial performance targets and general financial performance criteria in the project evaluation. Assess why any deviations have occurred.                                |
Bibliography


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<td>‘Recommendation 8’, Global NPO Coalition on FATF. Available at: <a href="http://www.fatfplatform.org/recommendation-8/">www.fatfplatform.org/recommendation-8/</a>.</td>
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