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ANNEX

to the Commission Implementing Decision on the financing of the annual action plan for EU foreign policy needs on support to EU citizens in the United Kingdom, global and regional support against scam centres and for strengthening resilience in Central Asia for 2026

Action Document on support to EU citizens in the United Kingdom, global and regional support against scam centres and for strengthening resilience in Central Asia

ANNUAL PLAN

This document constitutes the annual work programme within the meaning of Article 110(2) of the Financial Regulation, and an action plan within the meaning of Article 23(1) and (5) of the NDICI-Global Europe Regulation.

1 SYNOPSIS

1.1 Action Summary Table

1. Title **CRIS/OPSYS business reference** **Basic Act**	Support to EU citizens in the United Kingdom, global and regional support against scam centres and for strengthening resilience in Central Asia OPSYS number: ACT-63741 Financed under the Neighbourhood, Development and International Cooperation Instrument (NDICI-Global Europe)/ Overseas Association Decision/European Instrument for International Nuclear Safety Cooperation Regulation
2. Team Europe Initiative	No
3. Zone benefiting from the action	The action shall be carried out in the UK for priority 1, globally for priority 2 and in Central Asia for priority 3
4. Programming document	N/A
5. Link with relevant MIP(s) objectives / expected results	N/A
PRIORITY AREAS AND SECTOR INFORMATION	
6. Priority Area(s), sectors	Multisector
7. Sustainable Development Goals (SDGs)	Main SDG (1 only): SDG 17 – Partnerships to achieve the goal Other significant SDGs (up to 9) and where appropriate, targets: SDG 5: Gender Equality SDG 9: Industry, Innovation and Infrastructure SDG 16: Peace Justice and Strong Institutions
8 a) DAC code(s)	43010: Multisector aid

8 b) Main Delivery Channel	100000 - Public sector institutions 20000 - Non-governmental organisation 400000 - Multilateral organisations			
9. Targets	☒ Migration ☐ Climate ☒ Social inclusion and Human Development ☒ Gender ☐ Biodiversity ☐ Education ☒ Human Rights, Democracy and Governance			
10. Markers **(from DAC form)**	**General policy objective** @	**Not targeted**	**Significant objective**	**Principal objective**
	Participation development/good governance	☐	☒	☐
	Aid to environment @	☒	☐	☐
	Gender equality and women's and girl's empowerment	☐	☒	☐
	Reproductive, maternal, new-born and child health	☒	☐	☐
	Disaster Risk Reduction @	☒	☐	☐
	Inclusion of persons with Disabilities @	☒	☐	☐
	Nutrition @	☒	☐	☐
	RIO Convention markers	**Not targeted**	**Significant objective**	**Principal objective**
	Biological diversity @	☒	☐	☐
	Combat desertification @	☒	☐	☐
	Climate change mitigation @	☒	☐	☐
	Climate change adaptation @	☒	☐	☐
11. Internal markers and Tags:	**Policy objectives**	**Not targeted**	**Significant objective**	**Principal objective**
	Digitalisation @	☐	☒	☐
		YES	NO	
	digital connectivity	☐	☒	
	digital governance	☒	☐	
	digital entrepreneurship	☐	☒	
	digital skills/literacy	☒	☐	
	digital services	☒	☐	
	Migration @	☐	☒	☐
	Reduction of Inequalities @	☒	☐	☐

	Covid-19	☒	☐	☐
BUDGET INFORMATION				
12. Amounts concerned	Budget line(s) (article, item): 14 02 03 30 (Foreign Policy Needs) Total estimated cost: EUR 8 000 000 Total amount of EU budget contribution: EUR 8 000 000			
MANAGEMENT AND IMPLEMENTATION				
13. Implementation modality	**Direct management** through: - Grants **Indirect management** with the entity(ies) to be selected in accordance with the criteria set out in section 4.3.2			

1.2 Summary of the Action

This action will enable the EU to address short and medium-term foreign policy needs and opportunities by supporting innovative policies and initiatives, and by deepening EU relations and dialogues with target communities, forging alliances and partnerships. In particular, this action will support to EU citizens in the UK under the EU Settlement Scheme, strengthen the prevention, disruption, and mitigation of the threat posed by scam centres and associated organised crime dynamics and promote EU interests through strengthened resilience in Central Asia, fostering regional cooperation and a more independent information space.

1.3 Zone benefitting from the Action

The Priority "Support to EU citizens in the UK under the EU Settlement Scheme" shall be carried out in the United Kingdom.

The Priority "Global and Regional EU action against scam centres" shall be carried out globally.

The Priority 3 "Strengthening Resilience in Central Asia" shall be carried out in Central Asia.

2 RATIONALE

2.1 Context

Priority "Support to EU citizens in the UK under the EU Settlement Scheme": The EU Settlement Scheme (EUSS) was established by the UK government to safeguard the rights of EU citizens living in the UK following Brexit. In this context, several voluntary and community organizations have played a vital role offering specialised assistance to thousands of EU citizens, enabling them to secure their rights and continue their lives in the UK in line with the Withdrawal Agreement. Approximately 10% of EU citizens covered under the Withdrawal Agreement have relied on their support, and demand persists—around 3 000 new late applicants continue to emerge each month, while an estimated 1.4 million individuals are expected to transition from pre-settled to settled status. The Home Office's decision to end funding for these organisations by 31 March 2026 threatens to dismantle a critical support network at a time when need for support and advice remains critical. The decision not to extend funding for support services could leave thousands of vulnerable individuals without critical assistance, increasing their risk of exploitation and potentially leading to the loss of their lawful status.

Priority "Global and Regional EU action against scam centres": Industrial-scale online scam centres are one of the most rapidly expanding forms of organised crime globally, generating tens of billions of euros in annual losses and integrating multiple serious crimes into resilient criminal ecosystems: cyber-enabled fraud, human trafficking, money laundering, and corruption. They are a menace for societal trust, which is vital for the productive functioning of societies. The illicit financial infrastructure that sustains the industry, including platforms linked to DPRK cybercrime

operations, also poses broader security risks. The topic is also emerging as a political priority. The recent 25th EU ASEAN Joint Ministerial Statement (April 2026) stressed the need for both the EU and the ASEAN region to share expertise and cooperation to combat online fraud. The Bangkok Joint Statement issued by the Global Partnership against Online Scams in December 2025 aims to bring countries and regions together in the fight against online scams, while the Global Fraud Summit of March 2026 launched a global Call for Action.

Priority "Strengthening Resilience in Central Asia": In the contemporary geopolitical environment and in line with the EU Strategy for CA and other key documents[1], continuing to develop a strategic partnership with Central Asia is of growing importance. Central Asia represents a complicated intersection of interests, influences, and proximities involving a complex network of local communities as well as major powers such as Russia, China and Iran, as well as , the Gulf states, Türkiye and the US that compete with EU interests in the region.

2.2 Lessons learnt

Priority "Support to EU citizens in the UK under the EU Settlement Scheme": this is an innovative proposal requiring urgent action considering developments on the ground and which hence does not build upon any previous similar funded action/initiative.

Priority "Global and Regional EU action against scam centres": On the EU side, law enforcement coordination through the European Multidisciplinary Platform Against Criminal Threats (EMPACT) has produced results within the EU and the Western Balkans but has so far had limited operational reach into the jurisdictions where the largest scam operations are concentrated, such as Southeast Asia. In addition, existing external cooperation projects each address facets of the problem. However, none was designed to tackle the scam centre phenomenon holistically. In early 2026, FPI-1 commissioned a scoping study to assess and analyse the threat posed by scam centres and associated organised crime dynamics, with a view to informing and shaping potential future FPI interventions to prevent, disrupt, and mitigate these threats at global, transregional, and regional levels. The report puts forward nine recommendations for FPI/EU action, organised around three pillars (knowledge and situational awareness; operational capacity in partner countries; and external engagement and diplomatic leverage). This specific proposal will address some of these recommendations identified as priority, while others will be addressed through existing projects/programmes. The proposal also aims to complement the upcoming EU action plan against digital fraud by supporting its external dimensions, at the operational and diplomatic/international cooperation levels.

Priority "Strengthening Resilience in Central Asia": The action will be developed considering lessons and best practices learnt from recently ended initiatives with the aim of fostering diplomatic ties (e.g. the EU-CA Policy Workshop under FPI's Rapid Response Mechanism), as well as from the EU-funded actions "Cultivating Audience Resilience through Amplification of Vibrant and Authentic Narratives (CARAVAN)" and "Resilience and Engagement with Varied Information for a Vibrant Environment (REVIVE)''. On the one hand, the EU needs to pursue inclusive engagement with a broader set of actors, capable of generating multiplier effects beyond the diplomatic sphere in Central Asia. A comprehensive and integrated framework that strengthens regional cooperation, enhances societal resilience – including in the information space – and deepens strategic engagement with a broader set of actors is required. Relying on the existing regular policy dialogue opportunities, such as Cooperation Committee, Ministerial etc., do not suffice to provide the necessary format to deepen the mutual understanding and move the EU-CA partnership to a more strategic outlook. On the other hand, the action will build upon the regional and local networks and trust established with independent media outlets and journalists and partners. The action will be implemented in complementary to Team Europe Initiatives (e.g. on digitalisation) and other Global Gateway initiatives.

[1] European Commission (2019), Joint Communication to the European Parliament and the Council: The EU and Central Asia: New Opportunities for a Stronger Partnership, JOIN(2019) 9 final, Brussels, 15 May; Joint Road Map for Deepening Ties between the EU and Central Asia, endorsed at the EU-Central Asia Ministerial Meeting, Luxembourg, 23 October 2023.

2.3 Problem Analysis

Short problem analysis:

Priority "Support to EU citizens in the UK under the EU Settlement Scheme": the withdrawal of funding to a network of voluntary and community organizations risks leaving thousands of EU citizens, mostly vulnerable, without access to critical advice, potentially jeopardising their lawful status in the UK. Without support, many EU citizens would struggle to navigate the notoriously complex digital system. The cases are increasingly complex, often involving joining family members, late applicants from minority ethnic or rural backgrounds, or individuals with challenging social circumstances, all of which require specialised assistance to submit compelling applications to the Home Office. Moreover, the withdrawal of the funding cycle coincides with the roll-out of the curtailment policy for pre-settled status holders, which could revoke status from EU citizens due to prolonged absences from the UK. As a result, it is vital that any individuals facing difficulties have access to advice, to ensure that their rights under the Withdrawal Agreement are protected. The lack of sustained support also threatens a significant loss of expertise on the EUSS, a complex legal framework protecting the rights of 5.8 million EU citizens. These organizations have also formed a supportive network of legal advice, valued both by Member States and by citizens themselves.

Priority "Global and Regional EU action against scam centres": In early 2026, FPI-1 commissioned a scoping study to assess and analyse the threat posed by scam centres and associated organised crime dynamics, with a view to informing and shaping potential future FPI interventions to prevent, disrupt, and mitigate these threats at global, transregional, and regional levels. The report maps five distinct clusters of scam activity (Southeast Asia, Eastern Europe, West Africa, South Asia, and Latin America), each with its own organisational logic, operational methods, and workforce. Southeast Asia remains the global epicentre of this new form of industrialised fraud, requiring specific attention. The report notes that, despite widespread assumptions that the EU was shielded by linguistic diversity, EU citizens are already being targeted at scale: Recruitment channels for Southeast Asia scam operations explicitly seek workers with European language skills and experience on European markets; AI-powered translation has effectively eliminated the language barrier; and scam-linked actors are establishing corporate presences within the EU.

The central finding of the report is a fundamental mismatch between the dynamism, global reach, and shared infrastructure of the scam economy and the fragmented nature of the response. Enforcement remains largely confined to national jurisdictions, cooperation frameworks are slow and unevenly applied, and the institutional architectures through which governments respond remain siloed across cybersecurity, organised crime, human trafficking, and financial regulation. The report also notes that criminal groups displaced by enforcement in one jurisdiction consistently reconstitute in others.

Priority "Strengthening Resilience in Central Asia": Exchange of ideas among EU and CA officials, experts and general audiences remain limited which leads to many misconceptions about Europe and gives space to hostile foreign narratives, consequently influencing also public opinion and government agendas concerning engagement with the EU. At the same time, a fragile media landscape and shrinking civic space leave populations vulnerable to foreign information manipulation and interference (FIMI), disinformation, propaganda, and recruitment campaigns – particularly from Russia – which distort perceptions of Russia's war of aggression against Ukraine and serve Russia's nationalist and expansionist interests. Recent cuts in media funding both globally and locally further exacerbate these vulnerabilities. This volatile information environment ultimately threatens societal resilience, the EU-Central Asia partnership, and European investments. Against this context, it is crucial for the European Union to pursue an engagement that is not only substantive and visible, but also carefully aligned with existing regional dynamics and sensitivities. With this aim in mind, elevating the European Union's relationship with Central Asia must go beyond the funding of flagships and individual projects. It requires a comprehensive and integrated framework that strengthens regional cooperation, enhances societal resilience – including in the information domain – and deepens strategic engagement with a broader set of actors.

Identification of main stakeholders and corresponding institutional and/or organisational issues (mandates, potential roles, and capacities) to be covered by the action:

Priority "Support to EU citizens in the UK under the EU Settlement Scheme": At EU level, key stakeholder will include EU citizens living in the United Kingdom eligible under the EUSS, a network of voluntary and community organizations that help EU citizen secure their EUSS to ensure they can continue to live in the UK and hold their rights under the Withdrawal Agreement and the UK government who is responsible for granting (or removing) EUSS status to eligible EU citizens.

Priority "Global and Regional EU action against scam centres": At EU level, the main stakeholders are the European Commission, Europol and the EMPACT OPA/OFS, and Eurojust. Externally, key stakeholders will include countries that are involved with or impacted by scam centres, in Southeast Asia and in other regions across the globe, including less/non-cooperative jurisdictions. This would also include possible engagement with China on this topic, as it plays a very important role in this context (with ethnic Chinese and Taiwanese crime groups being behind major online scam operations).Other key stakeholders will include actors already engaged in efforts to combat scam centres, including countries, regional and global actors/mechanisms, as well as country-led initiatives, civil society, investigative journalists, and private sector initiatives (see more details below under the section "Complementarity, Coordination and Synergies with other actions"). The EU should adapt and build on these structures rather than create parallel ones, focus on existing gaps and prioritize actions that add value to the EU. At all levels of engagement, the action will promote a whole-of-society approach, including public-private partnerships.

It will also be essential to anchor this project in the current architecture of actors already engaged in efforts to combat scam centres, including countries (such as Australia, Hong Kong, Singapore, Thailand, the UK or the US), regional and global actors/initiatives/mechanisms (such as ASEAN, ASEANAPOL, EUROPOL, EMPACT, UNODC, INTERPOL, FATF, the Council of Europe, the Bali Process, or the Global Partnership against Online Scams, launched by Thailand and UNODC), as well as country-led initiatives, civil society, investigative journalists, and private sector initiatives (such as the Global Anti-Scam alliance). The EU should adapt and build on these structures rather than create parallel ones, focus on existing gaps and prioritize actions that add value to the EU. The project will need to keep an updated mapping of those initiatives to ensure proper engagement / coordination.

Within FPI, this project would be the central nod that "connects the dots" when it comes to technical assistance against scam centres, to avoid a piecemeal approach. In particular, the project will complement/coordinate closely with other existing FPI-funded programmes (including SIRIUS, GLACY-e, the AML/CFT Global Facility, ESIWA+), relevant INTPA-funded programmes (including those working on illicit financial flows/financial investigation such as SECFIN Africa, cybercrime, justice/security cooperation, etc.), relevant initiatives/efforts of other Commission DGs and EEAS as well as other initiatives funded by EU Member States (to be identified).

Priority "Strengthening Resilience in Central Asia": Key stakeholders will include Central Asian governments, such as the strategic institutes under the Central Asian Presidents/Foreign Ministries (depending on the country), Central Asian diplomats and officials; Central Asian academia, universities, think tanks, researchers etc.; civil society and cultural actors in and working on Central Asia, media outlets in and outside of Central Asia, organizations working with media in/on Central Asia, independent journalists, bloggers etc. and the general public in Central Asia and the EU.

3 DESCRIPTION OF THE ACTION

3.1 Objectives and Expected Outputs

The Overall Objective of this action is to the full, faithful and timely Implementation of the Withdrawal Agreement, to promote EU interests through strengthened resilience in Central Asia, fostered regional cooperation and a more independent information space.

The Specific(s) Objective(s) of this action are to

1. Support EU citizens in obtaining or retaining their status under the EU Settlement Scheme (EUSS) facilitating exercising their rights under the Withdrawal Agreement.

2. The prevention, disruption, and mitigation of the threat posed by scam centres and associated organised crime dynamics are strengthened, thereby supporting the external dimension of the upcoming EU Action Plan on Online Fraud.
3. Enhance presence and understanding of the European Union as well as solidarity and regional cooperation among Central Asian countries and between the EU and Central Asia through strategic engagement initiatives at different levels of society.

The Outputs to be delivered by this action contributing to the corresponding Specific Objectives are

1.1 contributing to Outcome 1 (or Specific Objective 1)

- EU citizens secure and retain their EU Settlement Scheme status.
- EU citizens, in particular those in vulnerable or marginalised situations, are able to better exercise the rights guaranteed under the Withdrawal Agreement, including access to healthcare, employment and housing, through targeted practical assistance.

2.1 contributing to Outcome 2 (or Specific Objective 2)

- The capacities of selected partner countries to prevent, disrupt, and mitigate the threat posed by scam centres are strengthened in full respect of fundamental rights and protection of personal data in particular. [national level with a specific stream focused on Southeast Asia]
- Institutional and operational cross-border cooperation, policy dialogue and political engagement are fostered in full respect of fundamental rights and protection of personal data in particular [regional / international level with a specific stream focused on Southeast Asia]

3.1 contributing to Outcome 3 (or Specific Objectives 3):

- EU dialogue with key government actors in Central Asia is enhanced on topics related to regional cooperation (e.g. environment, trade, etc.) and results presented in shared concepts (e.g. policy notes, discussion papers).
- European expertise on regional cooperation is provided to Central Asian key stakeholders and informed by local lessons learned from regional cooperation formats, such as the regional foresight exercise (May 2025), the VIII Central Asia Expert Forum (August 2025), and the Fergana Peace Forum (October 2025).
- Continued engagement and cooperation at institutional level is ensured by strengthening diplomatic ties at working level and building on the successful EU-CA Policy Workshop.
- Dialogue between EU and CA academia (e.g. universities, lecturers, think tanks, etc.) on topics of mutual EU-CA relevance (e.g. on FIMI) is strengthened.
- Civil Society's and cultural actors' (e.g. influencers, artists, women networks etc.) exposure to the benefits of regional cooperation as well as EU cooperation, EU values and policies is ensured.
- Research to determine relevant target audiences and how to effectively reach these is carried out.
- Capacity of media professionals to produce high-quality, fact-based, independently investigated content is strengthened, thereby contributing to a more resilient information environment less vulnerable to FIMI, disinformation, and hate speech.
- Cross-border and regional cooperation between Central Asian journalists is enhanced to advance freedom of expression and media independence in the region (e.g. cross border reporting, regional forums, regional networks etc.).

3.2 Indicative Activities

Activities relating to Output 1.1:

- Supporting late applicants to the EUSS and those whose applications have been refused, assisting them in navigating the appeals process;
- Offering free, expert-level immigration advice to citizens who are in the process of making applications under the EUSS and/or who are seeking to exercise their rights as set out in the Withdrawal Agreement;
- Assisting EU citizens who encounter difficulties in proving their immigration status or who face barriers in accessing essential rights and services, such as healthcare, employment, or housing;

- Delivering clear, accurate, and accessible information about the EUSS through a variety of formats, including online platforms such as Facebook forums, interactive webinars, and in-person drop-in sessions, in order to reach individuals with differing levels of digital literacy or language proficiency;
- Addressing individual queries and concerns relating to a broad spectrum of issues such as late applications, prolonged absences from the UK, transition from pre-settled to settled status, refusals and rejections of applications, curtailment or of joining family members.
- Conducting proactive outreach and engagement activities to encourage eligible individuals to apply for status under the EUSS, while raising broader awareness of the rights conferred by the Withdrawal Agreement towards a wide range of stakeholders and ensuring that vulnerable or marginalised groups—who may otherwise struggle to access support—receive the assistance they require to secure their status and protect their rights.
- Developing understanding of vulnerabilities and challenges like digital exclusion, lack of awareness, and access barriers faced by EU citizens their families and communities in the exercise of their rights and propose adequate measures to relevant UK authorities to address those vulnerabilities.

Activities relating to Output 2.1:
The intervention will combine three types of support to tangibly project the EU as security actor: (i) facility-type activities tailored to the needs of partner countries and EU priorities; (ii) policy, political and security engagement; and (iii) pilot actions on specific niches/themes. For each activity/output, the type of support will be selected based on what is more efficient and appropriate in the specific context.

In addition, the below list of activities is indicative and meant to represent the range of thematic support which could potentially be delivered under this project. However, not every activity will be delivered in every partner country, as support will be tailored to specific country needs and EU priorities, also considering other technical assistance projects/initiatives etc.

- Provide legal/institutional advice, including for example on governance structure, interagency coordination, public-private partnerships, models for information exchange between national authorities, etc.
- Identify and pilot legal, regulatory and operational/technical measures to reduce the effectiveness of scam operations.
- Deliver capacity-building activities, including to ensure that cyber-fraud investigations systematically proceed with a parallel financial track and that investigators and prosecutors cooperate more closely as well as investigative operational support.
- Support partner countries in establishing institutional connections with relevant EU entities and EU Member States; adopting protocols and systems for faster exchange of data, intelligence, and evidence between EU and relevant jurisdictions, as well as at the regional and cross-regional levels; and engaging in joint operations and joint investigations
- Support cooperation under the EMPACT sub-priority on online fraud schemes.
- Promote cooperation with international partners to identify and disrupt “enablers” i.e. the service providers that sustain the scam ecosystem across jurisdictions.
- Support relevant partner countries and other international partners engaged against scam centres with relevant information in particular in terms of general situational awareness, typologies, financial-flow mapping and links between affected regions
- Explore and establish structured partnerships with CSO and/or governments and/or multilateral partners to share survivor-derived intelligence with the EU and partner country law enforcement authorities and policymakers.
- Identify good practices and lessons learned which could be replicated in other countries/regions.
- Support EEAS policy dialogues with actors that are already involved, or ready to engage, with the aim to build coalitions and joint positions in relevant fora; as well with less or non-cooperative jurisdictions
- Explore pilot actions e.g. on victim support in Southeast Asia; to facilitate and speed up compensation for EU victims; for the implementation of an EU-ASEAN cooperation roadmap to tackle online scams; or for enhanced Europol - ASEANAPOL engagement towards possibly a cooperation framework

Activities relating to Output 3.1:

- Organise exchanges in dedicated workshops in- and outside Central Asia among key government stakeholders to discuss cooperation models on relevant topics with European governments and European experts/think tankers, including topics such as e.g. information integrity, resilience and capacity building, resource management, etc.
- Conduct trainings for and foster dialogue of junior Central Asian diplomats and officials with their European counterparts, exploring opportunities to focus on issues of regional cooperation and ensuring gender-balance and the inclusion of women leaders in diplomacy.
- Build up an alumni community/platform, in order to maintain the exchange between former participants, current and future participants and European counterparts working on Central Asia.
- Organise discussions with students and academic institutes on specific topics that could represent entry points (e.g. environmental cooperation, water management, countering FIMI and disinformation, historical legacies, etc.) and offering participatory approaches to curricula development.
- Launch and support engagement programmes (potential fellowships) targeting Central Asian students and young professionals, including researchers and lecturers etc.
- Organise collaborative initiatives focused on regional cooperation working with civil society, cultural actors (e.g. artists, historians and influencers etc.) on topical issues of societal relevance (e.g. environmental concerns, Foreign Information Manipulation and Interference (FIMI), historical legacies, etc.), respecting cultural dynamics and sensitivities.
- Provide European expertise and mentoring to cultural actors (e.g. creative avenues for people-to-people projects working with diverse communities that can have multiplying effects and bring together both traditional and contemporary cultural dimensions e.g. dance/music/film/creative economies etc.).
- Support public cultural initiatives (national and cross-regional) that exhibit regional cooperation, emphasising distinctive perspectives and experiences.
- Research and determine relevant target audiences and how to effectively reach these.
- Provide mentoring, consultation, and AI automation development capacities to selected media partners, including e.g.: combining editorial mentoring with organisational and business support, audience and product development, digital security, legal-security consulting and emergency or protective assistance, where needed.
- Support cross-border and regional collaboration (on topical issues of societal relevance (e.g. environmental concerns, countering FIMI, historical legacies, etc.), as well as exchange and peer-to-peer learning and solidarity among Central Asian journalists; e.g. through regional co-reporting, distributed production, and translation across markets.

3.3 Mainstreaming

This action mainstreams the following cross-cutting issues: Multilateralism (building alliances) contributing to a global order based on international law, EU principles and values (democracy, rule of law, human rights and fundamental freedoms, respect for human dignity, the principles of equality, including gender equality, and solidarity), Resilience and Innovation.

3.4 Risks

Category	**Risks**	**Likelihood (High/ Medium/ Low)**	**Impact (High/ Medium/ Low)**	**Mitigating measures**
External environment	Priority 1: Low engagement or resistance from key stakeholders. Limited reach, relevance and effectiveness of activities due to lack of adaptation to local languages and regional contexts.	L	H	Maintain flexible and adaptive approaches to participation formats. Ensure activities and support are tailored to local languages (Spanish, Portuguese, and English) and adapted to the specific needs and characteristics of each country.

External environment	Priority 2 Lack of engagement of partner countries and relevant global /regional actors.	L	H	Maintain flexible and adaptive approaches to participation formats. Ensure activities and support are tailored to the specific needs and characteristics of each country.
External environment	Priority 1: Perception of the EU as interfering in national democratic processes or the national information space.	M	M	Implementing partners and EU Delegations will communicate transparently with authorities taking into account their needs and interests and carefully monitor information space to mitigate any instances of EU criticism. EU visibility guidelines might be adjusted to ensure flexibility according to political sensitivities.
External environment	Priority 2: An "on-demand" approach may further disadvantage those countries which have historically ben less proactive in seeking support	M	M	Support might be offered in a more proactive way to specific priority countries
Planning processes and systems	Priority 2: Coordination challenges with other EU projects already operating on related issues, linking global and regional interventions.	L	M	Mapping and close coordination with complementary facilities and programmes
External environment	Priority 2: Influence or interference by external powers which can complicate EU action.	L	M	Careful monitoring of the political developments, continuous engagement with main stakeholders; identification of less sensitive topics of mutual interest to be explored
Planning processes and systems	Priority 2: Lack of frameworks for cross-border cooperation and evidence sharing amongst law enforcement authorities, and related challenges posed by human rights concerns and/ or data privacy regulations.	M	H	Support to be provided as a priority on those aspects, exploring formal and informal channels
Political sensitivity	Priority 3: political sensitivities around European values and regional cooperation, which could provoke nationalist backlash.	M	M	Balanced historical framing

4 IMPLEMENTATION ARRANGEMENTS

4.1 Financing Agreement

In order to implement this action, it is not envisaged to conclude a financing agreement with a partner country.

4.2 Indicative Implementation Period

The indicative operational implementation period of this action, during which the activities described in section 3 will be carried out and the corresponding contracts and agreements implemented, is 62 months from the date of adoption by the Commission of this Financing Decision.
Extensions of the implementation period may be agreed by the Commission's responsible authorising officer by amending this Financing Decision and the relevant contracts and agreements.

4.3 Implementation Modalities

The Commission will ensure that the EU rules and procedures for providing financing to third parties are respected, including review procedures, where appropriate, and compliance of the action with EU restrictive measures[2].

4.3.1 Direct Management (Grants)

Grants: (direct management)

(a) Purpose of the grant(s)

Priority "Strengthening Resilience in Central Asia"

The grant will contribute to achieving specific objective 3.

(b) Type of applicants targeted

Non-governmental organisations that have successfully established themselves as reliable partners to engage government-affiliated think-tanks in Central Asian countries on issues of regional cooperation and / or that are active in the field of capacity building, independent media support and audience research and analysis, with a good and proven understanding of the geopolitical landscape and media environment, including in particular in Central Asia.

(c) Justification of a direct grant

Under the responsibility of the Commission's authorising officer responsible, the grants may be awarded without a call for proposals to non-governmental organisations selected using the following criteria: unique position, legitimacy and trust to engage in discussions related to regional cooperations with government-affiliated think-tanks in Central Asian countries, and high degree of specialisation in independent media support in each of the targeted countries and communities and a corresponding network.

Under the responsibility of the Commission's authorising officer responsible, the recourse to an award of a grant without a call for proposals is justified for the following reasons:

- For a part of specific objective 3, owing to the specific characteristics of the action – in particular the high degree of political sensitivity of the context that would make the publication of an open tender on the subject of regional cooperation highly contentious, possibly undermining government readiness to enable these dialogue formats. Therefore, only a qualified organisation with specialised expertise,

[2]See www.sanctionsmap.eu. Please note that the sanctions map is an IT tool for identifying the sanctions regimes. The source of the sanctions stems from legal acts published in the Official Journal (OJ). In case of discrepancy between the published legal acts and the updates on the website it is the OJ version that prevails.

technical competence and existing networks of trust could ensure the political sensitivities surrounding the regional cooperation and solidarity discourse in Central Asia, as per Article 198, point(f), of the Financial Regulation; and

- For another part of specific objective 3, owing to the specific characteristics of the action – in particular the high degree of specialisation in independent media support needed in the sensitive context of Central Asia and the risk that local partners engaging in this action are exposed to in the target region and in relevant diaspora communities, where they work in highly restrictive environments for independent media and activists. Therefore, only a qualified organisation with a high degree of specialisation in each of the targeted countries and communities and a corresponding network, already benefitting from the trust of beneficiaries and stakeholders, experienced in capacity building of independent media is suitable to implement this action, as per Article 198, point(f), of the Financial Regulation.

The part of the action under the budgetary envelope reserved for grants may, partially or totally and including where an entity is designated for receiving a grant without a call for proposals, be implemented in indirect management with an entity, which will be selected by the Commission's services using the following criteria: operational capacity, solid expertise in the target region under specific objectives 3, relevant knowledge depending on the target group (track).

4.3.2 Indirect Management with an entrusted entity

Priority "Support to EU citizens in the UK under the EU Settlement Scheme"

The action may be implemented in indirect management with an entity, which will be selected by the Commission's services using the following criteria: pillar-assessed bodies/entities with an established presence in the United Kingdom; demonstrated in-depth knowledge of the EUSS process and legislation, including an understanding of its wider impact on individuals, families, and communities; experience providing direct assistance under the EUSS; collaboration with local authorities and voluntary and community-based organisations across the UK to build capacity and ensure access to the EUSS, particularly at risk of being left behind; experience of close cooperation with the EEAS, European Commission Directorates-General, other EU institutions, and EU Member States; significant experience in managing EU-funded actions. The implementation by this entity entails achieving specific objective 1 in section 3.1.

Priority "Global and Regional EU action against scam centres"

The action may be implemented in indirect management with an entity, which will be selected by the Commission's services using the following criteria: recognised expertise on online fraud / cybercrime and related organised crime; operational capacity to implement technical assistance programmes; good understanding of EU institutions and cooperation channels (such as Europol, EMPACT etc); presence in the region(s) targeted by the specific objective. The implementation by this entity entails achieving specific objective 2 in section 3.1.

Priority "Strengthening Resilience in Central Asia"

A part of this action may be implemented in indirect management with an entity, which will be selected by the Commission's services using the following criteria: an existing presence on the ground and / or dedicated expertise in the region and / or the ability to work with relevant Central Asian stakeholders (universities, academia, researchers, think tanks, civil society, cultural actors etc.) on topics related to regional cooperation. The implementation by this entity entails achieving part of specific objective 3 in section 3.1.

4.3.3 Changes from indirect to direct management mode due to exceptional circumstances

Priority "Global and Regional EU action against scam centres"

In the interest of the action, or if the negotiations with the selected entity(ies) fail, the part of the action contributing to the specific objective 2 in section 3.1 may be implemented in direct management (procurement) instead of indirect management with an entity.

The nature of the consultancy services to be provided can be outsourced by the Commission as the outsourced tasks do not involve the exercise of public authority and discretionary powers of judgement. This procurement will not make the Commission or the Partner Country overly dependent on the selected service provider. The services at stake will be better delivered by the service provider for the following reasons (not exhaustive, possibly cumulative):

- The high level of specialisation required is not available internally;
- the urgency to acquire certain skills not available internally;
- The need for flexibility to address volatile needs

The recourse to external consultancy services is required to meet the action's objectives and operational needs because of the high level of specialisation required and the need for flexibility to address various needs.

Priority "Strengthening Resilience in Central Asia"

In the interest of the action, or if the negotiations with the selected entity(ies) fail, the part of the action contributing to the specific objective 3 in section 3.1 may be implemented in direct management (direct grants) instead of indirect management with an entity.

The direct grants shall be awarded to non-governmental organisations that have successfully established itself as a reliable partner to engage government-affiliated think-tanks in Central Asian countries on issues of regional cooperation and / or that are active in the field of capacity building, independent media support and audience research and analysis, with a good and proven understanding of the geopolitical landscape and media environment, including in particular in Central Asia.

The implementation by these alternative entities would be justified based on the criteria defined in section 4.3.1. above.

4.4 Indicative Budget

Indicative Budget components	**EU contribution (amount in EUR)**
Implementation modalities – cf. section 4.3	
Objective 1 - Support to EU citizens in the UK under the EU Settlement Scheme - composed of	1 000 000
Indirect management with an entrusted entity- cf. section 4.3.2	**1 000 000**
Objective 2 - Global and Regional EU action against scam centres - composed of	3 000 000
Indirect management with an entrusted entity- cf. section 4.3.2	**3 000 000**
Objective 3 - Strengthening Resilience in Central Asia - composed of	4 000 000
Grants - cf. section 4.3.1	**2 800 000**
Indirect management with an entrusted entity- cf. section 4.3.2	**1 200 000**
Totals	**8 000 000**

4.5 Organisational Set-up and Responsibilities

A strong policy steering and monitoring of the action will be ensured by the EEAS and FPI in coordination with other relevant Commission services. The EU delegations in the region will also ensure direct contacts with the implementing partners and monitoring of the activities.

Dedicated steering committees may be established to act as advisory and reporting mechanism in order to provide the strategic and policy guidance needed to ensure smooth project implementation. Steering committees will define the priority work streams to be addressed. Steering committees will review and endorse annual work plans, monitor project outputs and achievements, and not least provide advice on how to address obstacles and challenges identified during implementation. Steering Committees, whose composition will be further detailed in the legal commitments, will comprise representatives of the European Commission services, the EEAS and relevant EU Delegations. As part of its prerogative of budget implementation and to safeguard the financial interests of the Union, the Commission may participate in the above governance structures set up for governing the implementation of the action and may sign or enter into joint declarations or statements, for the purpose of enhancing the visibility of the EU and its contribution to this action and ensuring effective coordination.

5 PERFORMANCE MEASUREMENT

5.1 Monitoring and Reporting

The day-to-day technical and financial monitoring of the implementation of this action will be a continuous process, and part of the implementing partner's responsibilities. To this aim, the implementing partner shall establish a permanent internal, technical and financial monitoring system for the action and elaborate regular progress reports (not less than annual) and final reports. Every report shall provide an accurate account of implementation of the action, difficulties encountered, changes introduced, as well as the degree of achievement of its results (Outputs and direct Outcomes) as measured by corresponding indicators, using as reference the logframe matrix (for project modality) and the partner's strategy, policy or reform action plan list (for budget support).

The Commission may undertake additional project monitoring visits both through its own staff and through independent consultants recruited directly by the Commission for independent monitoring reviews (or recruited by the responsible agent contracted by the Commission for implementing such reviews).

5.2 Evaluation

Having regard to the importance of the action, a final evaluation may be carried out for this action or its components via independent consultants contracted by the Commission.

It will be carried out for accountability and learning purposes at various levels (including for policy revision).

The Commission shall inform the implementing partners/contractors at least 3 months in advance of the dates envisaged for the evaluation missions. The implementing partners/contractors shall collaborate efficiently and effectively with the evaluation experts, and inter alia provide them with all necessary information and documentation, as well as access to the project premises and activities.

The evaluation reports may be shared with the partners and other key stakeholders following the best practice of evaluation dissemination. The implementing partner and the Commission shall analyse the conclusions and recommendations of the evaluations and, where appropriate, apply the necessary adjustments.

The financing of the evaluation may be covered by another measure constituting a Financing Decision.

5.3 Audit and Verifications

Without prejudice to the obligations applicable to contracts concluded for the implementation of this action, the Commission may, on the basis of a risk assessment, contract independent audit or verification assignments for one or several contracts or agreements.

6 STRATEGIC COMMUNICATION AND PUBLIC DIPLOMACY

The 2021-2027 programming cycle will adopt a new approach to pooling, programming and deploying strategic communication and public diplomacy resources.

In line with the 2022 "Communicating and Raising EU Visibility: Guidance for External Actions", it will remain a contractual obligation for all entities implementing EU-funded external actions to inform the relevant audiences of the Union's support for their work by displaying the EU emblem and a short funding statement as appropriate on all communication materials related to the actions concerned. This obligation will continue to apply equally, regardless of whether the actions concerned are implemented by the Commission, partner countries, service providers, grant beneficiaries or entrusted or delegated entities such as UN agencies, international financial institutions and agencies of EU Member States.

However, action documents for specific sector programmes are in principle no longer required to include a provision for communication and visibility actions promoting the programmes concerned. These resources will instead be consolidated in Cooperation Facilities established by support measure action documents, allowing Delegations to plan and execute multiannual strategic communication and public diplomacy actions with sufficient critical mass to be effective on a national scale.