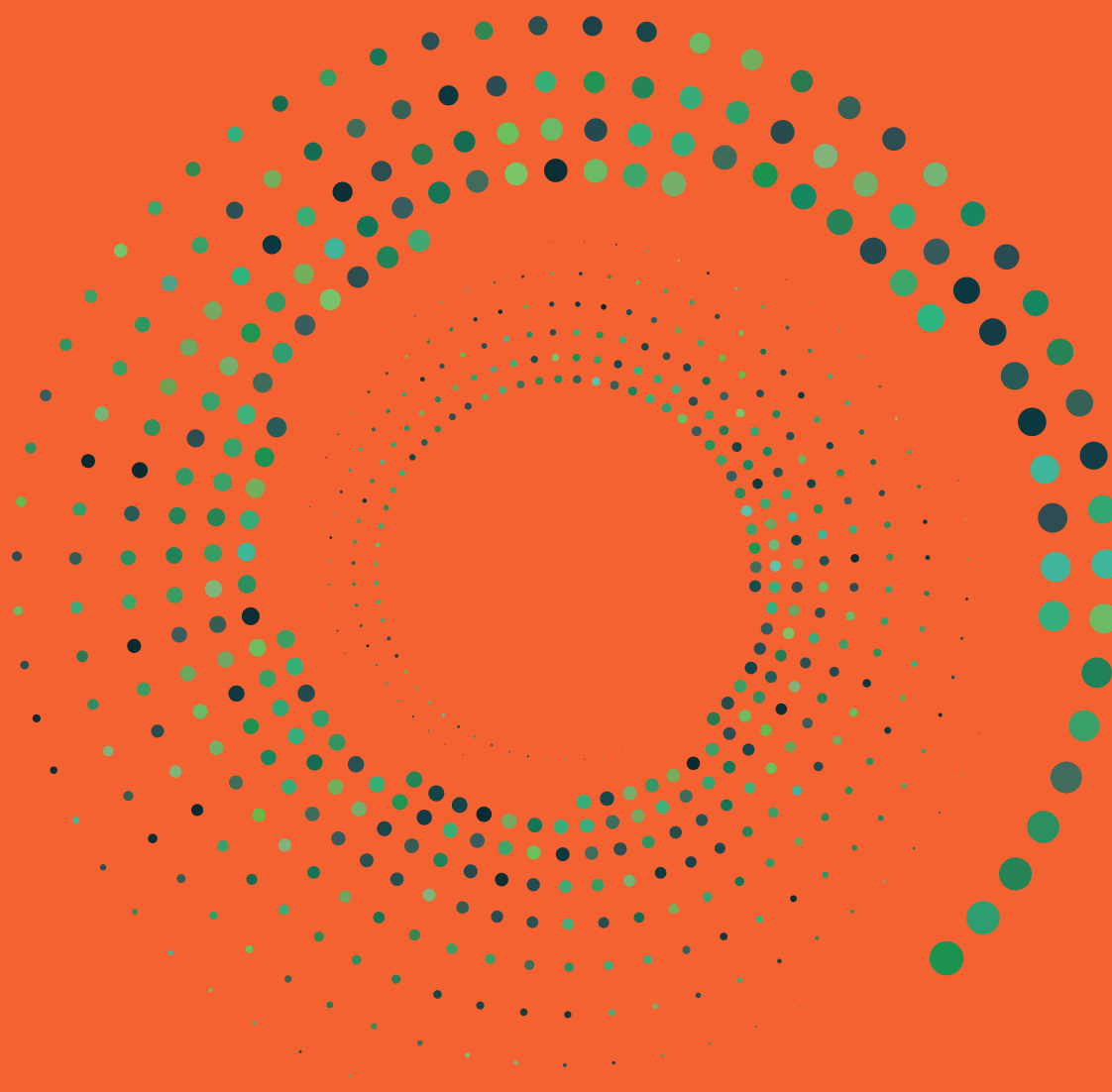


DG NEAR Guidelines for EU Support to Civil Society
in the Enlargement Region
2021-2027

2025 Assessment

REPORT FOR TÜRKİYE





This study was carried out by a team of experts under the supervision of the Hajde4EU project.

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List of Abbreviations

AML/CFT	Anti-Money Laundering / Countering the Financing of Terrorism
BCSDN	Balkan Civil Society Development Network
CAF	Charities Aid Foundation
CS	Civil Society
CSO	Civil Society Organisation
DG ENEST	Directorate-General for Enlargement and Eastern Neighbourhood
DGCSR	Directorate General for Civil Society Relations
ECF	European Civic Forum
ECRI	European Commission against Racism and Intolerance
ECTHR	European Court of Human Rights
EU	European Union
EUD	EU Delegation
EUR	Euro
FATF	Financial Action Task Force
FRA	European Union Agency for Fundamental Rights
HRBA	Human Rights-Based Approach
HRFT	Human Rights Foundation of Türkiye
ICNL	International Center for Not-for-Profit Law
İHD	Human Rights Association (İnsan Hakları Derneği)
IPA	Instrument for Pre-Accession Assistance
İŞKUR	Turkish Employment Agency
KE	Key Expert
KII	Key Informant Interview
LGBTIQ+	Lesbian, gay, bisexual, transgender and intersex, queer
MESEM	Vocational Training Centres (Mesleki Eğitim Merkezi)
MLSA	Media and Law Studies Association
DG NEAR	Directorate-General for Neighbourhood and Enlargement Negotiations (predecessor of DG ENEST)
PACE	Parliamentary Assembly of the Council of Europe
SMS	Short Message Service

* This designation is without prejudice to positions on status, and is in line with UNSCR 1244/1999 and the ICJ Opinion on the Kosovo declaration of independence

SO	Specific Objective
STGM	Civil Society Development Centre (Sivil Toplum Geliştirme Merkezi)
TACSO	Technical Assistance for Civil Society Organisations
TİHEK	Turkish Human Rights and Equality Institution
TRY	Turkish Lira
TÜSEV	Third Sector Foundation of Türkiye
UN	United Nations
UNDP	United Nations Development Programme
UPR	Universal Periodic Review
VAT	Value Added Tax

Methodology

Common methodology (Western Balkans and Türkiye)

This assessment applies the common methodology used across the seven targeted countries to assess the DG NEAR Guidelines for EU Support to Civil Society in the Enlargement Region 2021-2027, Hajde4EU's principal recurring analytical product, delivered annually as seven national reports and one regional report. It is an upstream advisory exercise for DG ENEST B1 and the EU Delegations and EU Office in Kosovo*, in which CSOs and independent media are subjects of analysis and dialogue partners, not direct beneficiaries.

The 2025 cycle applies the official, slightly revised methodology, retained to preserve comparability with the 2021 baseline and the 2023 and 2024 TACSO assessments. Assessment is organised around three Specific Objectives, scored through approximately 55-59 indicators, each combining an indicator-based grade with a qualitative narrative:

SO	Dimension assessed	What it measures
SO1	Legal and financial enabling environment	Registration, operation, freedoms of association/assembly/expression; state funding, fiscal framework, financial viability.
SO2	Public authority - civil society cooperation	Consultation and cooperation mechanisms, their mandate and effectiveness, inclusiveness (incl. HRBA-inclusive composition).
SO3	CSO capacity, sustainability and effectiveness	Organisational capacity, accountability, networking, and effectiveness in influence and service delivery.

Prior-year scores (2021-2024, particularly under SO3, are reference points only, not comparison baselines, due to inter-year methodological changes that widened the assessment's scope. For 2025, regional summary reports from the FRA Civic Space Update, ECF Civic Space Watch and the BCSDN Monitoring Matrix are appended where available for comparability, but not merged into the scoring.

Coordinators for IPA beneficiaries (and dedicated enabling-environment experts where needed) gather country-level evidence through a mixed-methods design: legal and desk review; structured online questionnaires targeting three groups (general CSOs, expert CSOs competent in the enabling environment, and public administration); key informant interviews; and focus groups. Evidence is processed through indicator-based scoring and qualitative narratives, verified through national validation meetings in June 2026 and internal Key Expert review, with working-draft consultation where agreed with EUDs. Internal or restricted Commission documents may inform data collection but are not cited.

Türkiye - country-specific approach to the methodology

The 2025 assessment for Türkiye is based on targeted desk review, survey data, specialised CSO input, key informant interviews, a specialised focus group and validation feedback. These sources are read together rather than in isolation. The General CSO Survey provides both quantitative CSO percentages and qualitative CSO input, the Specialised CSO Survey provides qualitative expert input used to confirm,

nuance or challenge wider survey and desk-review findings, and the Public Institutions Survey provides an institutional perspective and a means of triangulation, not a substitute for CSO experience.

Evidence base at a glance

Instrument	Responses	Notes
General CSO Survey	211	211 in final export, used for respondent-level aggregation; denominators vary by question
Specialised CSO Survey	9	Circulated to 17 expert organisations; 9 substantive responses
Public Institutions Survey	7	4 central, 3 local
Key informant interviews	2	Directorate for EU Affairs (4 June 2026); STGM (11 June 2026)
Specialised focus group	1	10 June 2026; 4 expert organisations
Validation meeting	1	Online, 19 June 2026

Survey data

The General CSO Survey, which was publicly available and open to all CSOs, was distributed from 20 May to 5 June 2026 via the Hajde4EU email database and platforms (LinkedIn¹, Facebook²), the Civil Society Resource Centre³, the EU Delegation to Türkiye, independent media organisations and CSO platforms including Bianet and Civil Pages, EU technical assistance programmes and national CSO networks, with targeted outreach to grassroots and local organisations. It was further disseminated to grassroots and local organisations through direct invitations and one-to-one follow-up by the Coordinator for Türkiye. The questionnaire was anonymous and consisted for the most part of closed questions. As not every respondent answered every question, the number of valid answers typically decreases as the questionnaire progresses. Unless stated otherwise, the percentages in this report are calculated against the valid responses to each question rather than the full sample. In total 211 valid responses from general CSOs in Türkiye were recorded and used where respondent-level aggregation was re-quired.

The Specialised CSO Survey was addressed to 17 expert organisations and networks working on capacity development; human rights; freedom of association, expression and assembly; women's rights and gender equality; LGBTIQ+ rights; freedom of journalism and media; youth rights; minority rights; and culture and arts. Its purpose was qualitative: to let expert voices confirm, qualify or push back against what the General CSO Survey and the desk review suggested. The nine substantive responses received were used for triangulation and validation of the General CSO survey findings and desk-review analysis.

The Public Institutions Survey, in turn, went to central, regional or entity-level and local bodies with experience of working with CSOs. The seven responses received (four from central institutions and three from local institutions) offer the institutional side of the picture and a point of triangulation, but it is not a stand-in for the experience of civil society itself.

¹ Hajde4EU, LinkedIn: <https://www.linkedin.com/company/hajde4eu/>

² Hajde4EU, Facebook: <https://www.facebook.com/Hajde4EU>

³ Civil Society Development Centre (STGM): <https://www.stgm.org.tr/en>

Respondent profile and reach

CSO respondents were concentrated in the main metropolitan centres (56%), with the remainder distributed across the country: Hatay (5%); Bursa, Diyarbakır and Van (3% each); Adana, Antalya, Eskişehir, Mardin, Muğla and Urfa (2% each); and other locations (18%). Around 51% of identifiable CSO respondents were women. Outreach intentionally included local institutions; however, the aggregate survey export did not allow systematic cross-tabulation by level of administration for all indicators.

Other relevant respondent information: *(Percentages as reported; totals may not sum to 100 due to rounding or multiple response options.)*

Türkiye	
Type of CSO	78% registered association; 10% registered foundation; 3% unregistered platform/network; 3% vocational, professional organisation or union; 1% not-for-profit cooperative; 5% other
Scope of work	48% national; 23% local; 22% international; 6% regional/sub-national/entity
Position in the CSO	54% President; 10% Executive director; 10% Manager; 5% Project staff; 3% Expert/consultant; 18% other
Thematic fields: top 5	41% human rights; 33% education, research and innovation; 29% youth and youth rights; 29% environment and climate action; 25% gender equality and LGBTIQ+ rights
Thematic fields: bottom 5	4% security; 4% public administration reform; 4% consumer protection; 4% amateur sports; 2% anti-corruption
Age	15% between 18-35; 73% between 36-65; 12% 66+

Key informant interviews and focus group

Two key informant interviews and one specialised focus group were integrated into the report. They were used as qualitative triangulation and are not treated as statistically representative evidence.

The first interview was held with the Directorate for EU Affairs on 4 June 2026. The second was held with the Civil Society Development Centre (STGM), the National Resource Centre, on 11 June 2026. A focus group meeting was held on 10 June 2026 with four specialised organisations: the Human Rights Joint Platform, covering human rights; Kaos GL, covering LGBTIQ+ rights; Women for Women's Human Rights Association, covering women's rights and gender equality; and the Journalists Association, covering freedom of media and journalism.

Validation

A validation meeting was held online on 19 June 2026 with representatives of the Civil Society Development Centre (STGM), Kaos GL, the Truth, Justice and Memory Center, the Human Rights Joint Platform, the Third Sector Foundation of Türkiye (TÜSEV), the Go-For Youth Organisations Forum, the Support Foundation for Civil Society, the Directorate for EU Affairs and the EU Delegation to Türkiye. Participants validated the findings of the country report in general terms. One substantive item of feedback was received, proposing the inclusion of additional information on the 'Year of the Family' announced

by the government in 2025 and its effect in intensifying anti-LGBTIQ+ policies and rhetoric. This was incorporated into the report.

Interpretation and context

Survey results are interpreted as indicative findings and read together with the desk review, CSO reports, reports of international organisations, interview and focus group evidence, and validation feedback. The findings are read in the context of the legal framework analysis concerning 2025.



Executive Summary

This report presents the findings of the 2025 assessment of Türkiye's civil society environment against the DG NEAR Guidelines for EU Support to Civil Society in the Enlargement Region 2021-2027. The reporting period was marked by the largest wave of protests in more than a decade, triggered by the March 2025 detention and arrest of Istanbul Metropolitan Mayor Ekrem İmamoğlu, met with extensive police intervention, mass detentions and allegations of ill-treatment in custody. No substantial legislative reform improved the framework governing the fundamental freedoms, restrictive administrative practices persisted, and the “agents of influence” proposal, though not enacted, remained under active consideration. Against this backdrop, the assessment finds an environment that continued to fall short of international human rights standards across most enabling-environment and cooperation indicators, offset by isolated judicial safeguards and by comparatively resilient organisational capacity within the sector itself.

Specific Objective 1 - Conducive Environment for Civil Society

Specific Objective 1 examines whether the legal, institutional and financial environment enables civil society organisations to operate freely, independently and sustainably. It assesses the protection of the fundamental freedoms of association, peaceful assembly and expression, safeguards against undue interference, the proportionality of regulatory requirements, access to domestic and foreign funding, public financial and non-financial support, taxation, philanthropy and volunteering, as well as the overall enabling environment for both registered organisations and informal civic initiatives.

Türkiye's legal framework governing freedom of association, peaceful assembly and expression saw no substantial reform in 2025, and the core-freedoms score remained at “does not meet standards”. Parliament did not amend the Law on Associations or the Law on Collection of Aid, arbitrary inspections and burdensome reporting obligations persisted, and the one notable judicial safeguard - the Council of State's 28 May 2025 annulment of the risk-based inspection classification system as lacking clarity and foreseeability - had limited practical effect, as intrusive inspections reportedly continued and the matter has not yet reached the Constitutional Court. Freedom of assembly remained severely restricted: following the İmamoğlu arrest, participation reached an estimated two million, while the authorities responded with extensive police intervention, resulting in injuries, hospitalisations, detentions, and allegations of ill-treatment in custody. In addition, the Human Rights Association documented 19 province-wide assembly bans across 13 provinces covering 126 days, affecting more than 40.8 million people in 2025. Freedom of expression stayed under pressure, with Türkiye ranked 159th of 180 in the World Press Freedom Index, CIVICUS maintaining a “repressed” classification, and the withdrawn “agents of influence” proposal reported as likely to re-emerge in a forthcoming judicial package.

Protection and remedies remained weak. The indicator on access to effective remedies stayed at “minimally meets standards”, with a Constitutional Court annulment removing the public-benefit restriction on legal aid but leaving eligibility unclarified, while the indicator on protection from threats, attacks and judicial harassment remained at “does not meet standards”. Some 35% of surveyed CSOs reported that their organisation or members had experienced threats, attacks, unlawful searches, property damage or interference with communications, up sharply from 16% in 2024, with rights-based, gender-equality and LGBTIQ+ organisations disproportionately targeted; the Human Rights Foundation of Türkiye documented at least 290 human rights defenders subjected to pressure, and the dissolution of the Young LGBTIQ+ Association on “obscenity” grounds illustrated continued closure proceedings. Official complaints remained rare, at 4-6%, reflecting low confidence in complaint mechanisms.

The AML/CFT framework continued to constrain legitimate CSO activity and the indicator remained at “does not meet standards.” Although FATF removed Türkiye from its grey list in June 2024, the restrictive amendments introduced under Law No. 7262 remained unrepealed, and rights-based and foreign-funded organisations reported that the concept of “risk” continued to shape inspection practices despite the Council of State ruling. Survey evidence showed reported restrictions doubling to 18%, with 10% reporting funding-related discrimination and 9% difficulties with banking operations.

Equal treatment, small-organisation enablement and access to funding all remained low. The indicator on equal treatment with businesses stayed at “does not meet standards,” as CSOs continued to face disproportionate reporting obligations, particularly on foreign funding, unmatched by any improvement in legal status. Unregistered initiatives could operate but not access funding or acquire legal personality, and the fundraising regime under the Law on Collection of Aid remained bureaucratic and discretionary.

Public financial support was the weakest cluster, with articulation, award criteria and perceived transparency all at “does not meet standards”. No central body plans or discloses total CSO funding, only the Ministry of National Defence published its allocations, and the Ministry of the Interior disbursed TRY 419 million (EUR 8.06 million) to CSO projects against a far larger and opaque aggregate transfer heading. Only 8% of CSOs assessed public funding as transparent and fair, and among unsuccessful applicants 53% believed authorities fund preferred organisations, with gender-equality and LGBTIQ+ organisations notably absent among those funded. Tax incentives remained minimal, with only 369 public-benefit associations and 345 tax-exempt foundations nationwide, and both giving and CSO-income indicators unchanged.

Volunteering remained largely unsupported at the systemic level, with no dedicated volunteering law or strategy and the relevant indicators at “does not meet standards.” Only 3% of CSOs reported benefiting from state employment programmes, and state volunteering programmes had negligible reach.

Specific Objective 2 - Cooperation and Partnership between CSOs and Public Institutions

Specific Objective 2 assesses whether civil society organisations are meaningfully involved in public decision-making processes and whether institutional mechanisms enable regular, transparent and inclusive dialogue between civil society and public authorities. The assessment covers the legal framework governing public consultations, the quality of consultation processes, participation in policy development and EU accession processes, as well as the effectiveness of institutional structures established to support government-civil society cooperation.

Türkiye’s framework for CSO participation in decision-making remained weak and the indicator stayed at “does not meet standards.” Consultation is governed primarily by a 2022 by-law that makes CSO engagement discretionary, does not explicitly mention CSOs, and reduced the minimum comment period from 30 to 15 days, with drafts deemed favourably received if no opinion is submitted. A methodological refinement separating access to drafts from the minimum comment period revealed that while 32% of CSOs reported involvement in at least one consultation, only 2% experienced a process meeting both effectiveness criteria simultaneously, and formal participation in government working groups reached only around 8%. Participants described consultations as largely formalistic, with rights-based organisations frequently excluded and cooperation more constructive at the level of opposition-led municipalities.

Public institutions’ attitude towards civil society deteriorated from “minimally meets standards” to “does not meet standards,” with only 17% of CSOs assessing institutions as supportive, down from 21% in 2024, against a markedly more positive institutional self-assessment.

The cooperation-strategy and dialogue architecture was effectively dormant. No civil society cooperation strategy was in force in 2025, the draft 2023-2027 Strategy prepared by the Directorate General for Civil Society Relations remained inactive, and all associated indicators stood at “does not meet standards.” The Civil Society Consultation Council remained inactive throughout the year, and the indicator on dialogue mechanisms, which had been “minimally meets standards” in 2021 and 2023, stayed at “does not meet standards” with no new institutionalised dialogue mechanism established.

Specific Objective 3 - CSOs’ Capacities and Resilience

Specific Objective 3 assesses the organisational capacity, sustainability and resilience of civil society organisations. It examines internal governance, strategic and financial management, accountability, organisational learning, communication, evidence-based work, stakeholder engagement and financial sustainability, recognising that resilient civil society organisations require not only an enabling legal environment but also sound governance systems, professional management, diversified resources and the capacity to adapt to changing political, economic and social circumstances.

Internal governance indicators showed pronounced apparent improvement, largely driven by revised survey methodology: 97% of CSOs reported having both a governing body and a governing document, up from 23% in 2024, prompting a cautious upgrade to “meets most standards” rather than “fully meets standards,” while regular conflict-of-interest checks rose to 59% under a broadened question formulation. Transparency in sharing governance information (45% via website), an organisational gender-equality policy (50%) and an organisational strategy (72%) were more modestly reported, with scores broadly stable.

Communication and evidence-based practice remained strong. All CSOs reported at least one online communication channel, led by Instagram, though media cooperation through partnerships fell to 15%. Some 86% of CSOs reported research-informed work, up from 78% in 2024, 98% engaged stakeholders through consultation or partnership, and network membership held at 72%, while cross-sectoral partnerships with academia, social partners and the private sector fell to 46%, continuing a multi-year decline.

Funding diversification and human-resource sustainability presented the sharpest structural concerns. Donor-income diversification eased to 54%, while the share of CSOs raising non-donor income rose to 89%. The most severe finding was human resources: the share of CSOs employing paid staff stood at 48%, a marginal recovery from 45% in 2024 but far below the 65-67% of prior years, and comprehensive human-resource policies remained almost entirely absent, with only 2% of organisations reporting the full set of nine listed policies. Public trust data were unchanged from the 2024 STGM survey, in which 36.5% of respondents expressed trust in CSOs, no comparable 2025 study having been conducted.



IPA beneficiary Assessment

Specific Objective 1: A conducive environment for civil society to carry out its activities is in place.

SO 1.1 | All individuals and legal entities in the Enlargement Region can establish, join and participate in non-formal and/or registered organisations, can assemble peacefully and can express themselves freely.

Indicator 1.1.a – Extent to which relevant domestic legislation provides that:

- ➔ Associations can be established or registered without discrimination on any grounds.
- ➔ No unlawful restrictions are placed on the scope of their activities or pursuit of their objectives.
- ➔ Their termination may only occur following a decision by an independent and impartial court.
- ➔ No unlawful restrictions are placed on freedom of peaceful assembly.
- ➔ Freedom of expression is exercised by all, and no unlawful restrictions are imposed.

Year	Compliance
2025	1 – does not meet standards
2024	1 – does not meet standards
2023	1 – does not meet standards
2021	1 – does not meet standards

In 2025, no substantial legislative reforms were adopted to improve the legal environment governing freedom of association, peaceful assembly, and expression in Türkiye. Although the Constitutional Court's 2024 annulment decisions regarding certain restrictive provisions of Law No. 7262 remained significant, Parliament did not introduce amendments to the Law on Associations or the Law on Collection of Aid during 2025.⁴ As a result, the legal and administrative framework applicable to civil society remained unchanged in its main features during the year, and continued to affect the exercise of these freedoms, including for rights-based organisations and organisations receiving international funding. Arbitrary inspections, burdensome reporting obligations, and risk-based audits targeting CSOs persisted throughout the year, contributing to an increasingly restrictive operational environment for CSOs.⁵

An important judicial development nevertheless took place in 2025 regarding administrative oversight mechanisms applicable to associations. On 28 May 2025, the Council of State annulled the regulatory amendments that had enabled associations to be classified into risk categories for inspection purposes, finding that the criteria lacked sufficient clarity and foreseeability.⁶ The Law on Associations merely referenced "risk assessment to be carried out" without regulating how they should be conducted. The

⁴ Constitutional Court of Türkiye, Decision No. 2024/11, 3 April 2024; Law on Associations No. 5253; Law on Collection of Aid No. 2860

⁵ Noted in the CSO surveys, interview and in the focus group meeting.

⁶ Council of State, 10th Chamber, E. 2021/6971, K. 2025/2774, 28.05.2025.

Regulations on Associations, likewise, provided only a superficial framework on this matter, leaving the details to the Directorate General for Civil Society Relations. This left the risk analysis entirely to the discretion of the administration. The Council of State's annulment decision has revoked this broad discretion; the criteria should therefore be directly regulated by the Regulation. Even if so regulated, the phrase 'in accordance with the risk assessments to be carried out', still lacks sufficient clarity and, in terms of regulating, by the Regulation itself, leaves a wide margin of discretion. As such, it constitutes a breach of Articles 7, 13 and 124 of the Constitution. However, as the matter has not yet been brought before the Constitutional Court, the Council of State's ruling does not yet provide full certainty on the matter.

CSOs had previously expressed concern that the risk-based classification system could enable arbitrary and discriminatory practices, particularly in relation to rights-based organisations and organisations receiving foreign funding. While this judgement constituted a notable development, civil society actors continued to report frequent inspections, reporting burdens, and intrusive administrative practices during 2025.⁷

Freedom of peaceful assembly remained severely restricted in 2025. According to several reports, authorities continued to ban, disperse, and intervene in demonstrations, protests, and public gatherings, often citing public order and security concerns; in particular, following the detention and subsequent arrest of Istanbul Metropolitan Mayor Ekrem İmamoğlu in March 2025⁸, Türkiye saw its largest wave of protests in more than a decade, with some estimates placing participation at up to two million people; the authorities responded with extensive police intervention, including the use of tear gas and rubber bullets against largely peaceful, predominantly young demonstrators, resulting in injuries, hospitalisations, detentions, and allegations of ill-treatment in custody, including strip searches of female detainees.⁹ Student protests, women's rights demonstrations, labour protests, and LGBTIQ+ gatherings, including Pride-related events, also faced restrictions and bans in several provinces. According to the Human Rights Association (İHD), in 2025 governorates issued 19 province-wide bans in 13 provinces, covering a total of 126 days, while district governorates issued 11 separate bans in 10 districts, covering an additional 74 days. İHD reported that the province-wide bans alone affected more than 40.8 million people.¹⁰ HRFT likewise documented that at least 46 events organised in six different cities to draw attention to or protest human rights violations were obstructed, and that 59 peaceful assemblies and demonstrations were banned, obstructed, or subject to police intervention during the reporting period.¹¹

Freedom of expression also remained under pressure in 2025. Journalists, human rights defenders, academics, trade union representatives, and political activists continued to face criminal investigations, prosecutions, detentions, and other forms of judicial pressure under provisions of the Turkish Criminal Code and anti-terror legislation that have long been criticised for broad wording and application.¹² Reporters Without Borders ranked Türkiye 159th out of 180 countries and territories in the 2025 World Press Freedom Index.¹³ CIVICUS continued to classify civic space in Türkiye as "repressed",¹⁴ and Freedom House continued to rate Türkiye as "Not Free".¹⁵ In the 2025 Universal Periodic Review process,

⁷ Noted in the CSO surveys, interview and in the focus group meeting.

⁸ Ekrem İmamoğlu was detained on 19 March 2025 as part of investigations involving corruption-related allegations and an accusation of aiding a terrorist organisation, at a time when he was widely seen as the main opposition figure most capable of challenging President Erdoğan. A court later ordered his pre-trial detention in the corruption investigation: Human Rights Watch, 2025a.

⁹ CIVICUS, 2025.

¹⁰ Human Rights Association (İHD), 2026.

¹¹ Human Rights Foundation of Türkiye (HRFT), 2025.

¹² UN Human Rights Council, 2025; International Center for Not-For-Profit Law (ICNL), 2026.

¹³ Reporters Without Borders, 2025.

¹⁴ CIVICUS, 2025.

¹⁵ Freedom House, 2025.

Türkiye received recommendations to ensure a safe and enabling environment for civil society organisations, human rights defenders, journalists, lawyers, and opposition actors, including by safeguarding freedom of expression, peaceful assembly, and association. The recommendations also urged Türkiye to prevent reprisals and intimidation, ensure accountability for violations, and align both legislation and implementation with international human rights standards governing civic space and political participation.¹⁶

International and domestic monitoring further pointed to restrictions affecting the media and digital sphere. During the protest wave in spring 2025 following the detention of the Istanbul mayor, international human rights organisations highlighted the detention of journalists and pressures affecting access to online information.¹⁷ In addition, the EngelliWeb 2025 report, prepared by the Freedom of Expression Association, argues that digital censorship in Türkiye has become broader, more systematic, and more diffuse, evolving from ordinary access blocking into what it describes as a form of “digital martial law.” It finds that censorship is now enforced through overlapping legal and administrative tools - including access blocking, content removal, bandwidth throttling, access ban on social media accounts from within Türkiye, technical infrastructure targeting, and the non-implementation of Constitutional Court rulings - making restrictions more flexible and harder to challenge.¹⁸

In 2025, the European Court of Human Rights (ECtHR) delivered judgments in 72 cases against Türkiye, finding violations of freedom of expression in five of them.¹⁹ During the same period, the Turkish Constitutional Court issued 146 rulings concerning fundamental freedoms, identifying 122 violations of freedom of expression, 22 violations of freedom of assembly, and two violations of freedom of association.²⁰ Despite these judicial findings, a substantial number of cases remain pending before both domestic and international courts. Combined with ongoing concerns raised by rights-based CSOs, these developments indicate that Türkiye’s legal and institutional framework continues to fall short of international human rights standards.

At the same time, although the controversial “agents of influence” proposal introduced in late 2024²¹ was not enacted in 2025, concerns remained among CSOs and international observers regarding the possibility of reintroducing similar legislation targeting CSOs funded by international organisations and human rights defenders. The provision was approved by the Parliamentary Justice Committee but was subsequently removed from the omnibus bill on 13 November 2024 following strong domestic and international civil society advocacy.²² Despite its withdrawal, the Ministry of Justice has signalled that similar legislation remains under consideration, and international CSOs reported in 2026 that the proposal is expected to re-emerge as part of the forthcoming 12th Judicial Package.²³

Overall, despite limited positive judicial developments, the continued use of restrictive administrative practices, recurring limitations on freedom of assembly and expression, and persistent pressure on

¹⁶ UN Human Rights Council, 2025.

¹⁷ Human Rights Watch noted that a dozen journalists were detained and later released while covering the demonstrations. In parallel, the FreeWebTurkey 2024–2025 Internet Censorship Report, prepared by Media and Law Studies Association (MLSA), documented the continued expansion of online censorship and the use of “national security” justifications to restrict access to digital content and platforms. Human Rights Watch, 2025b; Media and Law Studies Association (MLSA), 2025.

¹⁸ According to the EngelliWeb 2025 report, the Constitutional Court’s annulment of Article 9 of Law No. 5651 (Law on Regulation of Publications on the Internet and Combatting Crimes Committed by Means of such Publications) in 2023, did not end censorship based on alleged violations of personality rights; instead, similar restrictions were re-routed through Articles 8/A and 9/A of the same law and through interim injunctions issued by civil courts. In this way, censorship did not disappear after the formal annulment but continued under different legal labels, including national security, public order, protection of private life, and precautionary judicial measures, Freedom of Expression Association, 2025.

¹⁹ European Court of Human Rights, 2025.

²⁰ Constitutional Court of Türkiye, 2025.

²¹ Omnibus bill submitted to the Turkish Grand National Assembly on 18 October 2024.

²² European Federation of Journalists, 2024; Amnesty International Türkiye, 2024; Parliamentary Assembly of the Council of Europe (PACE), 2024.

²³ International Center for Not-For-Profit Law (ICNL), 2026.

rights-based organisations indicate that the legal and operational environment for civil society in Türkiye remained restrictive in 2025 and continued to fall short of international human rights standards.

SO 1.2 | Public authorities protect CSOs from interference and attacks and respect their right to privacy.

Indicator 1.2.a – Extent to which CSOs have access to an effective remedy to challenge or seek review of decisions affecting exercise of their rights.

Year	Compliance
2025	2 – minimally meets standards
2024	2 – minimally meets standards
2023	2 – minimally meets standards
2021	2 – minimally meets standards

No significant progress was made in improving CSOs’ access to effective legal remedies in 2025. Although legal remedies formally exist, persistent concerns regarding judicial independence, the rule of law, lengthy judicial procedures, and limited access to legal aid continued to undermine the effective protection of freedom of association and related rights.

The structural shortcomings identified in previous years also remained unresolved in 2025. The criminal law framework continued to lack specific sanctions and safeguards in cases where the rights of associations and foundations are violated, leaving CSOs without sufficient protection against arbitrary administrative interference or unjust restrictions. At the same time, legal proceedings concerning CSOs and activists continued to be characterised by lengthy procedures, uncertainty, and inconsistent judicial practices.

A significant legal development in 2025 concerned the Constitutional Court’s 2024 annulment decision regarding the “public benefit status” requirement under Article 334/2 of the Code of Civil Procedure. The annulment entered into force on 21 August 2025, removing the previous restriction that only public benefit associations and tax-exempt foundations could apply for legal aid. Despite this positive development removing a significant obstacle to CSOs’ access to legal aid, Parliament did not adopt any new legislation in 2025 to clarify the eligibility of associations and foundations for legal aid as a whole; leaving considerable uncertainty on this matter. Since there is currently no explicit provision clarifying which types of organisation are eligible for such support, even CSOs that were previously eligible may lose access to such assistance unless new provisions are adopted. This situation amounts to a failure to comply with the Constitutional Court’s decision to annul the provision, and to its being implemented in a contrary manner.

While the legal framework does not explicitly prevent CSOs from seeking free legal assistance, legal aid mechanisms operated by bar associations predominantly serve eligible individuals rather than legal entities. With the 2025 legal aid budget set at TRY 691 million (EUR 12.9 million)²⁴, equivalent to approximately TRY 8.03 (EUR 0.15)²⁵ per capita, available resources remain limited. Given the limited resources available and the prioritisation of individual applicants, CSOs face significant challenges in obtaining free legal support in practice. It should be noted that the legal aid service in question is provided by the

²⁴ Union of Turkish Bar Associations, 2025, https://d.barobirlik.org.tr/2025/adli_yardim_dagitim_tablosu.pdf

²⁵ According to the Central Bank of Türkiye exchange rate in June 2026.

bar associations. No disaggregated data are published regarding the individuals or CSOs to whom the bar associations provide legal aid. For this reason, it has not been possible to assess the impact of the Constitutional Court's ruling.

According to the specialised CSO survey, slightly over half of participating CSOs stated that CSOs were only partially or rarely able to challenge government decisions negatively impacting CSOs' ability to exercise their rights through official, legal, judicial and administrative channels. In the general CSO survey, among those who stated that they were unable to challenge such decisions effectively through official, legal, judicial, and administrative channels, a common concern was the lack of confidence in the independence and impartiality of the judiciary and the perception that legal challenges were unlikely to produce meaningful results. Participants cited the high costs of litigation, limited organisational capacity, complex procedures, lengthy proceedings, and the lack of consistent jurisprudence regarding administrative sanctions imposed on associations. Many organisations reported refraining from legal action because they feared retaliation, additional inspections, or further administrative pressure, while others lacked the financial resources necessary to pursue lengthy litigation. Access to legal aid was also considered highly limited in practice.

In addition, participating CSOs in the interview and the focus group meeting acknowledged that some bar associations and lawyers' rights centres continue to support civil society organisations through legal counselling, strategic litigation, training, and legal representation in cases concerning freedom of association, assembly, and expression. However, the availability of such support varies considerably across provinces and remains insufficient to address the broader structural barriers affecting access to justice for CSOs.

Overall, despite the existence of formal legal remedies, access to effective justice for CSOs remained constrained in 2025. The continued lack of judicial safeguards against violations of freedom of association, uncertainty regarding access to legal aid following the Constitutional Court's ruling, limited financial and institutional support for litigation, and persistent concerns over judicial independence and lengthy proceedings undermined the effectiveness of available remedies, leaving the framework only minimally compliant with international standards.

Survey Results

	% CSOs saying the government did not take any decisions that negatively impacted their ability to exercise their rights	% CSOs saying the government took decisions that negatively impacted their ability to exercise their rights
2025	79%	21%
2024	81%	19%
2023	79%	21%
2021	82%	18%

Indicator 1.2.b – Extent to which CSOs are protected by law from threats, attacks, judicial harassment and discriminatory treatment, in particular:

- ➔ threats including intimidation, harassment, defamation, as well as hate speech online and offline
- ➔ attacks including acts of violence, physical abuse, searches and damage to property
- ➔ judicial harassment including arbitrary arrest and detention, unlawful interference with communications, and abuse of criminal, civil and administrative proceedings, or threats thereof
- ➔ discriminatory treatment, including disproportionate reporting requirements for CSOs.

Year	Compliance
2025	1 – does not meet standards
2024	1 – does not meet standards
2023	1 – does not meet standards
2021	1 – does not meet standards

No significant legal reforms were introduced in 2025 to strengthen the protection of CSOs against threats, attacks, judicial harassment, or discriminatory treatment. The legal framework continued to lack specific safeguards protecting associations and foundations from violations related to the exercise of freedom of association, assembly, and expression. As a result, CSOs, journalists, activists, and human rights defenders remained vulnerable to administrative pressure, arbitrary investigations, smear campaigns, and judicial harassment throughout the year.²⁶

Existing legal provisions, including Articles 114, 115, and 118 of the Turkish Criminal Code, continued to provide only limited and indirect protection. These provisions primarily address violations related to political rights, freedom of belief, and trade union rights, but do not explicitly and comprehensively protect associations and foundations against interference, intimidation, or discriminatory treatment linked to their civic activities. No legislative amendments were adopted in 2025 to address these gaps or strengthen legal guarantees for civil society actors.

Furthermore, existing legal safeguards against hate speech such as Article 216 of the Turkish Criminal Code continued to be insufficient. Although certain legal provisions addressing hate speech are in place,²⁷ their implementation remained inconsistent and largely ineffective, thereby undermining protection against discriminatory practices and treatment²⁸.

In Türkiye, CSOs working on gender equality and LGBTIQ+ rights are often targeted by concerted campaigns of defamation. By 2025, pro-government media and conservative social media networks repeatedly referred to these organisations as “threats to traditional Turkish family values.”²⁹ Such purposeful mischaracterisation seeks to delegitimise CSOs in the eyes of the public and alienate local communities from CSOs. According to civil society sources, organisations working on human rights, gender equality,

²⁶ Human Rights Foundation of Türkiye (HRFT), 2025.

²⁷ Although Article 122 of the Turkish Criminal Code regulates the offence of “Hatred and Discrimination”, it criminalises the obstruction of individuals’ rights and freedoms (such as access to employment, the sale or rental of property, or the provision of services) on grounds including language, race, gender, religion, or political opinion. Article 216 of the Turkish Criminal Code addresses hate speech, primarily focusing on the limitation of freedom of expression rather than the prohibition of hate speech itself.

²⁸ European Commission against Racism and Intolerance (ECRI), 2025.

²⁹ E.g. Ministry of Family and Social Services, 2025

LGBTIQ+ rights, minority rights, and freedom of expression continued to face administrative pressure, public targeting, and litigation.³⁰ The continuation of closure-related proceedings and judicial action against certain organisations and activists was another factor that significantly jeopardised CSOs' freedom of association.³¹ Notably, the report published by Kaos GL presents the "Year of the Family" as a central state-backed framework that intensified anti-LGBTIQ+ policies and rhetoric, contributing to what it describes as the most violation-heavy year for LGBTIQ+ people in Türkiye due to a roughly 50% increase in violation-causing incidents compared with the previous year.³² The report argues that this discourse was not merely symbolic, but was translated into censorship, restrictions on expression and assembly, and broader institutional pressure against LGBTIQ+ visibility and rights.

Repeated audits are seen as a type of institutional harassment for CSOs.³³ Human rights CSOs are undergoing constant aggressive financial inspections and judicial probes under the guise of fighting terrorism financing or money laundering. Such administrative methods deplete the limited resources of CSOs and are a strong discouragement to their fundamental activities. Additional evidence is provided by the Human Rights Foundation of Türkiye (HRFT), which documented that at least 290 human rights defenders were subjected to at least one form of pressure, obstacle, or obstruction during the reporting period, while at least seven CSOs were directly or indirectly targeted and subjected to judicial or administrative harassment on the grounds of their human rights activities.³⁴

Physical harassment of CSO activists most often takes place during the heavy-handed dispersal of peaceful public demonstrations. When groups such as the Saturday Mothers, women's rights CSOs or environmental defenders attempt to hold demonstrations, police interventions often involve disproportionate force, resulting in physical injuries, being dragged along the ground and being tightly handcuffed behind the back.³⁵

In addition, many participating CSOs that directly contributed to this assessment online and offline, identified a broad range of government decisions and administrative practices that negatively affected their activities, including burdensome administrative requirements, arbitrary inspections, office-related restrictions, delays in obtaining permits, and limitations on participation in local decision-making.

Several organisations also pointed to the continued non-implementation of Constitutional Court decisions annulling restrictive provisions and noted that sanctions following inspections have created a climate of uncertainty. Participants cited restrictions on the use of virtual offices, limitations on multiple associations sharing the same premises, and difficulties in obtaining permissions for fundraising and public events.

Participants also reported continued restrictions on freedom of peaceful assembly and expression, including bans on demonstrations, investigations following public statements, and restrictions on civic activism. Although courts occasionally annulled assembly bans as unlawful and disproportionate, similar restrictions continued to be imposed by governorates.³⁶ Concerns were also raised about the use of symbols, including rainbow flags, as evidence in criminal investigations.

Organisations working on gender equality and LGBTIQ+ rights reported increasing pressure, referring to anti-LGBTIQ+ rhetoric, discriminatory policy debates, and legislative initiatives targeting LGBTIQ+ communities. Participants highlighted restrictions on gender equality terminology in training materi-

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³⁰ Kaos GL, 2025.

³¹ Such as the Young LGBTIQ+ Association

³² Kaos GL, 2025.

³³ E.g. European Commission, 2025

³⁴ Human Rights Foundation of Türkiye (HRFT), 2025.

³⁵ E.g. Truth, Justice, Memory Center, 2025

³⁶ Haber Sol, 2025

als, concerns over the 10th and 11th Judicial Reform Packages, and ongoing closure cases and criminal proceedings against LGBTIQ+ organisations, including investigations based on social media content and allegations of obscenity, as well as the closure of university-based LGBTIQ+ student clubs.

Indicator 1.2.c – Proportion of CSOs that operate effectively without threats, attacks, judicial harassment in terms of:

- ➔ number of complaints concerning lack of protection of CSOs;
- ➔ number of attacks on CSOs and their members;
- ➔ number of instances of damage to property;
- ➔ number of instances of discriminatory treatment in reporting;
- ➔ number of instances when CSO offices were unlawfully searched, or subjected to inspections;
- ➔ number of instances of interference with the communications of CSOs.

In 2025, the CSO survey detected a remarkable increase in the proportion of CSOs who report verbal threats, physical attacks, unlawful searches, property damage or interference with communications compared with previous years. According to the CSO survey, 35% of participating organisations reported that either their organisation or their members had been subjected to at least one of the following situations: verbal threats, physical attacks, property damage, unlawful searches or interference with communications, while such occurrences were 16% in 2024, 22% in 2023 and 11% in 2021.

Survey Results

	% CSOs saying that their organisation or its members were subject to threats or physical attacks, unlawful searches, property damage or interference with communications	% CSOs that submitted an official complaint	% CSOs saying that the authorities interfered with the communications of their CSO
2025	35%	4%	11%
2024	16%	N/A	N/A
2023	22%	N/A	N/A
2021	11%	N/A	N/A

The most commonly reported forms of pressure experienced by CSOs were unlawful or excessive searches or inspections (18%), interference with communications (11%), funding-related discrimination (10%) and restrictions on banking operations (9%).

These results suggest that the most prevalent challenges faced by CSOs are not physical attacks but rather administrative pressure, inspections, funding-related discrimination, restrictions on financial operations, and various forms of intimidation and harassment. Such findings point to a pattern of indirect constraints on civil society activities through regulatory, administrative, and financial mechanisms.

In addition, in regard to the open-ended questions in both the specialised and general CSO survey, several responding CSOs highlighted a broader environment of pressure, intimidation, and discrimination affecting civil society actors, particularly human rights defenders, migrants' rights advocates, and organisations perceived as critical of public authorities.

Some participating CSOs in the CSO survey reported that, although their organisations had not been directly targeted, persistent attacks and pressure against human rights defenders contributed to a climate of insecurity and self-censorship. Participants also referred to the public stigmatisation of organisations working with refugees, migrants, or international funding. One respondent described being publicly accused of espionage during a meeting attended by public institutions and CSOs because of their work with refugees and internationally funded projects. In addition, several organisations reported inspections of official documents and administrative controls which, even when not resulting in sanctions, were perceived as forms of indirect pressure on civil society.

According to the general CSO survey, only 6% of the participating CSOs submitted an official complaint to the authorities. Among those who stated that they did not submit an official complaint, the most commonly identified obstacle was concern for personal or organisational safety (14%), followed by lack of awareness of the right to complain (9%). Furthermore, 9% of respondents reported that previous complaints had not resulted in an effective response from the authorities, while 3% did not know how to submit a complaint. Some participants in the general CSO survey and the majority of participating CSOs to the specialised survey (86%) expressed a lack of confidence in the effectiveness of complaint mechanisms and the judiciary, stating that they did not believe a complaint would produce a meaningful outcome. Others feared that submitting a complaint could lead to further discrimination, administrative repercussions, or damage to their relations with public institutions. Participating CSOs in the CSO survey also highlighted practical barriers, including uncertainty about complaint procedures and the perception that the authority responsible for handling complaints was also responsible for the alleged violation. One organisation reported refraining from filing a complaint after being publicly accused of espionage, despite having the legal capacity to do so, because it feared challenging a powerful actor. By contrast, three public institutions participating in the public institutions survey rated CSOs' ability to operate without threats, attacks, judicial harassment, or discriminatory treatment as "sufficient" or "very high."

SO 1.3 | Measures used to fight extremism, terrorism, money laundering or corruption are targeted and proportionate in line with the risk-based approach, and respect human rights standards on freedom of association, assembly and expression.

Indicator 1.3.a – Extent to which laws to combat extremism, terrorism, money-laundering and corruption do not unduly restrict legitimate activities of CSOs.

Year	Compliance
2025	1 – does not meet standards
2024	1 – does not meet standards
2023	1 – does not meet standards
2021	1 – does not meet standards

Türkiye does not have a standalone law specifically addressing extremism or corruption. Instead, terrorism-related offences are regulated through various provisions of the Turkish Penal Code, the Law on the Fight Against Terrorism, and the Law on the Prevention of the Financing of Terrorism, while money laundering is governed by the Law on the Prevention of Laundering Proceeds of Crime. Corruption-related offences are addressed through relevant provisions of the Turkish Penal Code. Following

the Financial Action Task Force (FATF)'s 2019 grey-listing of Türkiye,³⁷ Parliament adopted Law No. 7262 on Preventing the Financing of the Proliferation of Weapons of Mass Destruction in 2020. Although intended to strengthen the anti-money laundering and counter-terrorism financing framework, the law also introduced restrictive amendments to the Law on Associations and the Law on Collection of Aid, raising concerns about disproportionate limitations on the legitimate activities of CSOs.³⁸ In 2021, the Ministry of the Interior further introduced a risk-based inspection mechanism classifying CSOs into high-, medium-, and low-risk categories.³⁹ These measures formed part of the reforms assessed by FATF, which removed Türkiye from its grey list on 28 June 2024.⁴⁰

In 2025, no substantial legislative reforms were introduced to prevent laws combating extremism, terrorism, money laundering, and corruption from unduly restricting the legitimate activities of CSOs. Although in 2024 the Constitutional Court annulled several restrictive provisions of the Law on Collection of Aid and the Law on Associations, which had been previously introduced under Law No. 7262 and had granted excessive discretionary powers to public authorities, a positive development,⁴¹ no comprehensive amendments were adopted to align the legal framework with international human rights standards on freedom of association.

At the same time, an important judicial development took place in 2025 concerning administrative oversight practices imposed on associations. A case brought by the Freedom of Expression Association before the Council of State challenging amendments to the relevant Regulation was concluded in 2025. The Council of State annulled the amendments on the grounds that the criteria for classifying associations into risk categories were not clearly defined and could be altered annually, creating legal uncertainty and increasing the risk of arbitrary inspections. The Court held that such provisions violated the principles of legal certainty and predictability, noting that regulations granting the administration broad discretionary powers without clearly defined limits could lead to arbitrary practices and were therefore unlawful.⁴² Although the ruling represented an important judicial safeguard against excessive administrative interference, its practical impact remained limited, as intrusive inspection practices reportedly continued.⁴³ As stated above (Indicator 1.1.a), the phrase 'in accordance with the risk assessments to be carried out', as set out in the Law on Associations, still lacks sufficient clarity and, in terms of incorporating new provisions into the Regulation, leaves a wide margin of discretion; as such, it constitutes a breach of Articles 7, 13 and 124 of the Constitution. Thus, an amendment is needed in the Law on Associations in this respect.

In addition, participating CSOs in the CSO surveys, an interview and in the focus group meeting, indicated that the implementation of anti-terrorism, anti-money laundering, and counter-terrorism financing measures remained a source of concern for both CSOs and international observers throughout 2025. Rights-based organisations, organisations working on gender equality and LGBTIQ+ rights, independent media organisations, and foreign-funded CSOs reported continued administrative pressure, inspections, extensive reporting obligations, and broad discretionary oversight by public authorities, including the Directorate General for Civil Society Relations, the Social Security Institution, and the Ministry of Education. Although the Council of State annulled the risk-based classification system for associations, participants noted that the concept of "risk" - arbitrarily applied by the administration without a clear legal basis under Article 19 of the Law on Associations - continues to shape inspection practices in practice. Several organisations reported repeated inspections shortly after previous audits

37 Bianet, 2021

38 TÜSEV, 2021

39 Ministry of Interior, 2021

40 Ministry of Treasury and Finance, 2024

41 Constitutional Court of Türkiye, 2024/11

42 Council of State, 10th Chamber, E. 2021/6971, K. 2025/2774, 28.05.2025.

43 As reflected in the CSO surveys, interview and in the focus group meeting.

had been completed, while inspection procedures were often described as inconsistent and highly dependent on the discretion of individual inspectors. Some organisations also reported being questioned about their cooperation with or support for LGBTIQ+ organisations. Civil society actors continued to criticise these measures as disproportionate, arguing that they place an excessive burden on independent organisations and contribute to a chilling effect on civic space.

Closure proceedings and judicial actions against associations also continued during 2025. Rights-based organisations working on human rights, gender equality, minority rights, freedom of expression, and LGBTIQ+ rights continued to face investigations, criminal proceedings, and administrative pressure under broadly interpreted anti-terror and national security legislation. In 2025, the Young LGBTIQ+ Association, which operates in İzmir, was dissolved on the grounds of “obscenity”, citing its social media posts, as well as for allegedly carrying out activities inconsistent with the objectives and areas of work set out in its statute and acting in breach of the provisions of the Turkish Civil Code governing associations and the Law on Associations.⁴⁴ In addition, a lawsuit that was filed against Tarlabası Community Centre in 2022, seeking the dissolution of the organisation on the grounds that its activities were allegedly contrary to the law and public morality is still ongoing.⁴⁵

Despite certain positive judicial developments, including Constitutional Court and Council of State rulings limiting aspects of administrative discretion, Türkiye’s legal framework and implementation practices in 2025 continued to fall short of international standards regarding the protection of legitimate CSO activities from disproportionate restrictions linked to extremism, terrorism, money laundering, and corruption measures.

Indicator 1.3.b – Proportion of CSOs whose ability to undertake legitimate activities is not restricted by the implementation of laws to combat extremism, terrorism, money-laundering and corruption, and in particular by:

- ➔ Being judicially harassed for their alleged connections with extremism, terrorism, money-laundering and corruption
- ➔ Discriminatory restrictions placed on funding
- ➔ Authorities or banks preventing them from opening bank accounts, sending or receiving money

The survey results indicate that judicial harassment linked to allegations of extremism, terrorism, money laundering, or corruption affected a relatively small proportion of CSOs but considerably increased in 2025. In 2025, 18% of participating CSOs reported that they faced one of the following situations at least once: judicial harassment for alleged connections with extremism, terrorism, money-laundering or corruption, or their organisation was subjected to discriminatory restrictions as a consequence of receiving funding from a particular source, or their organisation was prevented, by government authorities or banks, from opening a bank account, or sending or receiving money. This is double the percentage seen in 2024 (9%), and in 2021 (8%), while it is considerably higher than 2023 (11%).

Some 10% of participating CSOs reported discriminatory restrictions, 4% judicial harassment related to alleged connections with extremism or terrorism, 9% difficulties in opening bank accounts or receiving/sending money, while 1% reported judicial harassment linked to alleged money laundering or corruption.

Although the percentages are low, these findings remain significant given the potentially severe consequences of such allegations, including reputational damage, legal uncertainty, and operational disruptions. Combined with the broader concerns expressed by CSOs regarding inspections, compliance

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⁴⁴ Bianet, 2025

⁴⁵ The association was sealed on 8 October 2024 and the next hearing will be held on 16 September 2026: Bianet, 2026.

requirements, and administrative scrutiny, the findings suggest that the implementation of laws aimed at combating terrorism, extremism, money laundering, and corruption continues to generate concerns about their potential impact on legitimate civil society activities.

Survey Results

	% CSOs saying their members were subject to judicial harassment	% CSOs saying their organisation had been subjected to discriminatory restrictions	% CSOs saying they could not open a bank account or faced restrictions sending/ receiving money
2025	4%	10%	9%

SO 1.4 | Public authorities treat all CSOs equally with regard to their operations, and equitably with other entities (such as businesses).

Indicator 1.4.a – Extent to which laws:

- ➔ Do not require CSOs to submit more reports and information than businesses.
- ➔ Do not subject CSOs to more inspections and sanctions than business entities, all else being equal.

Year	Compliance
2025	1 – does not meet standards
2024	1 – does not meet standards
2023	1 – does not meet standards
2021	1 – does not meet standards

No legislative changes were adopted in 2025 to reduce the regulatory burdens faced by CSOs, and the existing framework continued to fall short of international standards on freedom of association. The Law on Associations remained unchanged with regard to notification requirements and administrative sanctions.⁴⁶ CSOs continued to be subject to disproportionate reporting obligations, particularly concerning foreign funding, including mandatory notifications before receiving funds from abroad or transferring assistance to other countries.⁴⁷ These requirements imposed additional administrative burdens on CSOs, which, unlike commercial entities, remained subject to extensive reporting obligations without any corresponding improvement in their legal status.

⁴⁶ According to Article 32 of the Law on Associations, a series of administrative fines are envisaged for associations which have failed to fulfil their notification obligations duly, ranging from TRY 2,321 (EUR 43 EUR) to TRY 755,574 (EUR 14,123) in 2025 (Ministry of Interior, 2024).

⁴⁷ Subsequent amendments brought in the Law on Associations together with the Law on Preventing Financing of Proliferation of Weapons of Mass Destruction (Presidency of Administrative Affairs, 2020).

SO 1.5 | Central and/or local public authorities have enabling policies and rules for small community organisations and civic initiatives (grassroots organisations)

Indicator 1.5.a – Small community/local organisations and civic initiatives are allowed to operate by law without registering.

Year	Compliance
2025	2 – minimally meets standards
2024	2 – minimally meets standards
2023	2 – minimally meets standards
2021	2 – minimally meets standards

No legislative reforms were adopted in 2025 to address existing restrictions, and the legal framework governing civil society remained unchanged. As a result, opportunities for organisational diversity within the sector continue to be limited. Although community groups, local initiatives, and informal civic movements are not prohibited, they cannot fully exercise the rights associated with freedom of association - such as access to funds and aids - without obtaining formal legal status. The legal framework continues to recognise only a limited number of non-profit legal forms, including associations, foundations, federations, confederations, trade unions, labour unions, and cooperatives, while excluding alternative models such as non-profit companies. Furthermore, although platforms are recognised under Article 2 of the Law on Associations, they do not possess legal personality.

Indicator 1.5.b – In law, unregistered small community/local organisations and civic initiatives enjoy the same right to participation in decision-making processes as registered CSOs.

Year	Compliance
2025	2 – minimally meets standards
2024	2 – minimally meets standards
2023	2 – minimally meets standards
2021	2 – minimally meets standards

Although there is no explicit restriction for the participation of small community/local organisations and civic initiatives in decision-making processes, participation of CSOs in public decision-making processes is regulated by law only to a limited extent. At the central level, Article 30(2) of the Rules of Procedure of the Grand National Assembly of Türkiye has envisaged that the Committees may invite experts in order to consult them for their views. This provision does not explicitly refer to CSOs and it does not include CSOs in any way. It does not give any place to CSOs and rather seems to enable individual participation. Even if the said article is interpreted broadly, it does not include a requirement to allow CSOs to participate or to consult with them while enacting laws. As to Article 29, the chairperson of the committees may give the floor to the experts invited by the committee as he/she may deem necessary. The most important piece of legislation at the central level is not a law but a by-law.

Article 6(4) of the By-law on the Procedures and Principles of Drafting Legislation, which was issued by the Presidency in 2022 and substitutes for a former by-law that was adopted in 2006, stated that the opinions of CSOs on the drafts may be used. The Article does not make it obligatory to submit to the CSOs the laws, presidential decrees, presidential decisions, by-laws and other regulatory proceedings to be prepared by the Presidency or other administrative bodies.

SO 1.6 | All CSOs are free to solicit and receive funding.

Indicator 1.6.a – Extent to which relevant laws allow CSOs to seek a broad range of funding, including from abroad, without undue restrictions as regards

- ➔ cash and in-kind donations from all sources
- ➔ funding from domestic public bodies
- ➔ funding from institutional, corporate or individual donors
- ➔ funding from foreign governments or multilateral agencies

Year	Compliance
2025	2 – minimally meets standards
2024	2 – minimally meets standards
2023	2 – minimally meets standards
2021	2 – minimally meets standards

The main legislation on collecting donations is the Law on Collection of Aid. The fact that Türkiye uses two different notions, “aid” and “donation”, and that the difference between the two is not clearly specified in the applicable legislation, causes problems in practice. According to the Law on Collection of Aid, associations and foundations may collect aid compatible with the public interest to realise their objectives, provide assistance to people in need, and provide or support the provision of one or more public services. According to the Law on Collection of Aid, the general rule is that persons and institutions may not collect aid without obtaining permission from authorised bodies. Associations and foundations do not have to obtain permission for the donations of their members (such as membership fees) and other people’s donations, or for the income they will generate through their own equity capital. On the other hand, it is mandatory to obtain permission in order to collect aid. Associations and foundations may receive in-kind and cash contributions from individuals, institutions and organisations abroad; however, they have to declare this to the local administrative authority beforehand and are obliged to notify the relevant authorities, such as the Directorate General for Civil Society Relations and the Directorate-General of Foundations, before using these resources. Any income-generating activity (activities in public space, campaigns, collection of donations via SMS) conducted by CSOs in a place other than where their headquarters are located is defined as a fundraising activity, and thus becomes subject to permission under the provisions of the Law on Collection of Aid. Only the associations, institutions and foundations serving for public interest and allowed by the President are entitled to collect aid without obtaining permission. Obtaining public benefit status is subject to special permission which is implemented by a Presidential decision upon a recommendation by the Ministry of the Interior and there are no concrete and accountable criteria which identify the necessary conditions for obtaining public benefit status. As to the Law on Associations, associations may receive monetary or in-kind aid from persons, institutions or organisations abroad, provided they declare this to the local

administrative authority beforehand. It is obligatory to receive monetary funds by means of banks, and fulfil the declaration obligation before using the funds. The same applies for foundations as well. Associations and foundations may also receive donations from persons, institutions or organisations abroad without getting prior permission; however, they have to inform local administrative authority before using the donation received.

Although the Constitutional Court annulled part of Article 10 of the Law on Collection of Aid in 2024⁴⁸ no further legislative action was taken in 2025 to address broader concerns regarding the compatibility of the fundraising framework with international standards on freedom of association. Consequently, existing legal and administrative barriers continued to affect CSOs' financial sustainability and resource mobilisation efforts.

Indicator 1.6.b – Proportion of CSOs that can access a broad range of funding without undue government interference.

In 2025, 11% of participating CSOs in the CSO survey reported experiencing direct institutional interference, such as arbitrary audits or unlawful searches, marking an increase from 5% in 2024, 10% in 2023 and 4% in 2021. Arbitrary audits and inspections constitute a primary share of these interferences. Beyond these direct actions, participating CSOs detailed a deepening of bureaucratic hurdles and a restrictive political atmosphere.

CSOs that participated in the CSO surveys, the interview and in the focus group meeting further reported that public authorities continued to apply restrictive and often unpredictable practices regarding fundraising and alternative funding sources. The Law on Collection of Aid was widely criticised for imposing excessive bureaucratic requirements, lacking transparency and predictability, and granting broad discretionary powers to public authorities. Organisations reported uncertainty regarding the criteria applied when evaluating fundraising applications and noted that access to alternative funding sources remained constrained. Concerns were also raised regarding the lack of publicly available information on the implementation of collection of aid legislation, including the absence of official data on the number of applications submitted, approved, or rejected.

SO 1.7 | Public financial and non-financial support to CSOs is available in IPA beneficiaries, and provided in a transparent, accountable, fair and non-discriminatory manner.

Indicator 1.7.a – The level of public funding available for CSOs and associations is clearly articulated in laws and regulations, and the rights and duties of the state body invested with the ability to set and revise the level of public funding available is clearly defined in law.

Year	Compliance
2025	1 – does not meet standards
2024	1 – does not meet standards
2023	1 – does not meet standards
2021	1 – does not meet standards

The Public Financial Management and Control Law and the By-law on Assistance to Associations, Foundations, Unions, Institutions, Organisations, Provident Funds and Similar Organisations from the Bud-

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⁴⁸ The Constitutional Court annulled the final sentence of Article 10, which restricted the extension of aid collection permits to one year. The provision was deemed unconstitutional (Constitutional Court of Türkiye, 2024/128).

gets of Public Administrations under General Administration provide the legal basis for forms of aid⁴⁹ that are allowed for the organisations cited in the title of the regulation, and leave it to the relevant public authorities to determine the budget to be allocated to the organisations. The law and regulations do not specify clearly the level of public funding available for CSOs in a given year. As there is no state body invested with the ability to set and revise the level of public funding available, there exists no law defining the rights and duties of such a body. Related to this, relevant ministries (such as the Ministry of the Interior, Ministry of Family and Social Services, Ministry of Youth and Sports) issue directives and regulations on providing aid to associations and similar organisations. No legislation or policy paper exists that allows public support for the institutional development of CSOs. Nor is it possible to determine how much funding was transferred specifically to associations and foundations from the central administration budget. All ministries separately identify the total budget they are planning to transfer to CSOs, and there is no central planning or responsible public institution for identifying the total amount of budget to be allocated by ministries to CSOs.

Consequently, public funding for CSOs remained limited and insufficiently transparent, with no notable improvements observed in 2025.

Indicator 1.7.b – Percentage of public budget actually disbursed to CSOs in a year.

No legislative changes were introduced in 2025 regarding public funding for CSOs. Various public institutions, including the Ministry of Treasury and Finance and Ministry of the Interior, continued to provide financial support to CSOs. However, transparency regarding the allocation of public resources remained limited. The only ministry that has publicly disclosed the amounts allocated to CSOs from the 2025 budget is the Ministry of National Defence.⁵⁰

The Ministry of Treasury and Finance's budget under the heading "General Government Budget Expenditures"⁵¹ and "Transfers to Non-Profit Organisations" includes information on transfers made to associations, unions, institutions, organisations, funds, and similar entities. According to the budget, a total of TRY 17.71 billion (EUR 331 million) was allocated to non-profit organisations from the Ministry's budget in 2025. In addition, another budget line under the same heading indicates that a total of TRY 5.28 billion (EUR 98.6 million) was transferred to "other non-profit organisations" in 2025.

Furthermore, under the Ministry of Treasury and Finance's "Local Administration Budget Expenditures"⁵² and "Transfers to Non-Profit Organisations", a total of TRY 13.15 billion (EUR 245.86 million) was allocated to associations, unions, institutions, organisations, funds, and similar entities in 2025. However, none of these budget headings or expenditure items specify which non-profit organisations received the funding, limiting the transparency of public financial support.

While some information on supported projects, such as total number of projects supported, is publicly available, comprehensive data on the total amount of funding allocated to CSOs by public institutions is not systematically disclosed. The legal framework governing public support, including the Directive on Assistance to Associations from the Budget of the Ministry of the Interior, continues to lack clear provisions regarding the level of funding available to CSOs and the criteria governing its allocation. In 2025, the Ministry of the Interior allocated TRY 419 million (EUR 8.06 million)⁵³ to CSO projects. Although funding levels have increased in nominal terms in recent years, concerns persist regarding the adequacy, transparency, and predictability of public funding available to CSOs.

⁴⁹ According to the Art. 4 of the By-law on Assistance to Associations, Foundations, Unions, Institutions, Organisations, Provident Funds and Similar Organisations from the Budgets of Public Administrations under General Administration, "aid" refers to cash aid to be given from administrative budgets to organisations.

⁵⁰ Ministry of National Defence, 2025

⁵¹ Ministry of Treasury and Finance, 2025a

⁵² Ministry of Treasury and Finance, 2025b

⁵³ Ministry of the Interior, 27 February 2026.

Year	Amounts Disbursed to CSOs by the MoI	Amounts Disbursed Under Relevant Public Budget Heading
2025	TRY 419,005,227 (EUR 8,057,800)	TRY 22,986,358,000 (EUR 429,648,339)
2024	TRY 247,315,608 (EUR 6,733,340)	TRY 12,031,683,000 (EUR 224,889,590)
2023	TRY 100,000,000 (EUR 2,722,570)	TRY 7,702,091,000 (EUR 143,963,241)
2022	TRY 69,766,000 (EUR 1,899,428)	TRY 4,523,583,000 (EUR 84,552,321)
2021	TRY 42,000,000 (EUR 1,143,479)	TRY 2,262,068,000 (EUR 42,281,329)

Indicator 1.7.c – Extent to which legal provisions regulating the award of public funding to CSOs ensure that:

- ➔ funding criteria are clearly defined, objective and publicly announced
- ➔ evaluation of proposals is clear and impartial
- ➔ conflict of interest is clearly regulated
- ➔ reporting requirements are clear and proportionate

Year	Compliance
2025	1 – does not meet standards
2024	1 – does not meet standards
2023	1 – does not meet standards
2021	1 – does not meet standards

No legislative amendments were introduced in 2025 regarding the transparency, fairness, and accountability of public funding for CSOs. The legal framework continues to lack clear criteria governing the allocation of public resources, independent evaluation mechanisms, and safeguards against conflicts of interest. Public authorities retain broad discretion in distributing funds, while information on funding opportunities, eligibility requirements, and evaluation procedures remains limited. In 2025, the only ministry that published project calls and application guidelines was the Ministry of the Interior, the Directorate General for Civil Society Relations. Although the Directorate General for Civil Society Relations published project calls and application guidelines, these documents generally provide only broad eligibility and assessment criteria and do not disclose the total amount of funding available.⁵⁴

⁵⁴ Ministry of Interior, 2025a

Indicator 1.7.d – Central governments make the information on awards publicly available and sufficiently detailed to identify individual awards.

Year	Compliance
2025	2 – minimally meets standards
2024	2 – minimally meets standards
2023	2 – minimally meets standards
2021	2 – minimally meets standards

The By-law on Provident Funds from the Budgets of Public Administrations⁵⁵ continues to require public institutions to disclose information on financial support provided to organisations, including the purpose and amount of the assistance. However, implementation remains uneven and does not ensure sufficient transparency. Detailed information on recipient organisations is often not disclosed. As a result, public access to comprehensive information on the allocation of public resources remains limited, making it difficult to assess the fairness, impartiality, and accountability of public funding mechanisms.

Indicator 1.7.e – Proportion of CSOs indicating that the provision of domestic public funds is transparent, fair and non-discriminatory.

Year	Compliance
2025	1 – does not meet standards
2024	1 – does not meet standards
2023	1 – does not meet standards
2021	1 – does not meet standards

No significant change was detected in terms of the proportion of CSOs who indicate that the provision of domestic public funds is transparent, fair and non-discriminatory. In 2025, similarly to the previous years, only a very small portion (8%) of participating CSOs reported that they found the provision of domestic public funds fair and transparent, as compared with 11% in 2024, 6% in 2023 and 9% in 2021. A considerable number of CSOs (71%) stated that they did not find the provision of public funding to CSOs transparent (31%, not transparent and fair at all, and 40%, insufficiently transparent and fair), compared with 63% in 2023 and 49% in 2021. Only 21% of the CSOs stated that they found the provision of public funding to CSOs sufficiently transparent and fair. On the other hand, four of the participating public institutions rated the transparency and fairness of their institution's public funding procedures for CSOs as very and sufficiently transparent and fair. Only one public institution stated that public funding procedures for CSOs are insufficiently transparent.

Participants⁵⁶ also highlighted barriers related to access to funding and financial sustainability. Concerns included the rejection of project applications, the lack of transparent and impartial distribution of public funding, bureaucratic delays, difficulties accessing funding opportunities, and unequal treat-

⁵⁵ By-law on Assistance to Associations, Foundations, Unions, Institutions, Organisations, Provident Funds and Similar Organisations from the Budgets of Public Administrations under General Administration.

⁵⁶ In the CSO surveys, interview and in the focus group meeting.

ment of foundations and associations within tax and public benefit frameworks. Participants criticised the fundraising authorisation regime for being excessively bureaucratic, unpredictable, and dependent on discretionary decision-making. Some organisations reported that fundraising applications remained pending for extended periods or were rejected without clear justification, while others highlighted the absence of publicly available data on fundraising applications and approvals, limiting transparency and accountability.

Several participants further argued that access to public funding is not provided on an equal basis across the sector. They noted that associations and foundations perceived as being close to the government appear to obtain public-benefit status more easily and enjoy greater access to fundraising permissions, public resources, and state support mechanisms. By contrast, organisations working on human rights, democracy, gender equality, and other rights-based issues reported that they are largely excluded from public funding opportunities. Participants also pointed to limited transparency regarding funding decisions, noting that information on successful applicants, evaluation criteria, and the justification for funding allocations is rarely disclosed. Some organisations reported that rights-based CSOs are not systematically informed about available funding opportunities, while others indicated that informal references or endorsements from public institutions are widely perceived as necessary to access certain public funding schemes. These perceptions contributed to concerns that public funding mechanisms lack transparency, fairness, and equal access for all CSOs.

Survey Results

	% CSOs that did not apply for public funding	% CSOs applied for public funding and were not successful	% CSOs applied for funds and were successful
2025	60%	70%	30%

Indicator 1.7.f – Public funding does not exclude CSOs on the basis of constituency representation

Neither Article 10 (project co-financing) of Law No. 5253 on Associations, nor Article 27 (public benefit status) contains any explicit exclusion criterion based on the constituency a CSO represents. On its face, the legal framework does not bar organisations from state funding because of who they serve (LGBTIQ+, minorities, women, refugees, etc.). However, the framework is discretionary rather than entitlement-based: Article 10 support is confined to joint projects within a public institution's own mandate and awarded at its discretion, while public benefit status is granted by Presidential decision on the proposal of the Ministry of the Interior. The reliance on case-by-case administrative judgement rather than clear rules means that the absence of a formal exclusion clause does not guarantee constituency-neutral access in practice. The 2025 assessment, however, indicates that participation in public funding remains restricted, with persistent scepticism regarding the impartiality of allocation processes. In 2025, 40% of participating CSOs applied for public funding, a notable increase from the 24% recorded in 2024. However, of those who applied, 70% reported that their application was unsuccessful, showing a five percentage point increase from 2024 (65%).

Survey Results

	% CSOs that did not apply* for public funding	% CSOs applied for public funding and were not successful	% CSOs applied for funds and were successful
2025	60%	70%	30%

*Did not apply is calculated among all respondents; success rates are among applicants.

The CSO survey indicates that concerns regarding the fairness and inclusiveness of public funding mechanisms persisted in 2025. Among the CSOs whose applications for public funding were unsuccessful, more than half (53%) believed that public authorities primarily fund organisations they prefer, suggesting a continued perception of political bias in the allocation of public resources. In addition, 9% of respondents stated that public authorities were unwilling to support the work carried out with the constituencies they serve and represent, indicating concerns about exclusion based on the nature of their activities or target groups. Organisations successful in receiving public funding were concentrated in youth and youth rights (42%), education (37%), and environment and climate and CSO resilience (both 26%). Among those rejected, education (39%), human rights (30%), environment (30%) and youth (28%) dominated. Gender equality and LGBTIQ+ was notably absent among funded organisations (5%) despite appearing in 20% of rejected organisations, suggesting this area faces particular barriers to public funding access in Türkiye.

SO 1.8 | Individuals and corporations enjoy tax benefits for their donations to CSOs.

Indicator 1.8.a – Tax legislation allows for tax relief as regards:

- ➔ Individual giving
- ➔ Corporate giving

Year	Compliance
2025	2 – minimally meets standards
2024	2 – minimally meets standards
2023	2 – minimally meets standards
2021	2 – minimally meets standards

No legislative reforms were introduced in 2025 to improve the tax treatment of CSOs. The existing tax framework continued to provide only limited incentives for charitable giving and civil society development. Under the Income Tax Law and Corporate Tax Law, donations to public-benefit associations and tax-exempt foundations remain deductible up to 5% of taxable income, or 10% in priority development regions. However, access to these privileged statuses remains restricted, difficult to obtain and highly political,⁵⁷ with only 369 public-benefit associations⁵⁸ and 345 tax-exempt foundations⁵⁹ registered in Türkiye in 2025. While these organisations benefit from certain VAT exemptions for activities in ar-

⁵⁷ As they may only be obtained upon the recommendation of the Ministry of the Interior and with the decision of the President.

⁵⁸ Ministry of Interior 2025b

⁵⁹ Revenue Administration, 2025

eas such as education, culture, science, and social welfare, no comprehensive VAT exemption regime exists for CSOs. Concerns also persist regarding the lack of clear and objective criteria for obtaining public-benefit and tax-exempt status, as well as the transparency and predictability of the application process. Despite repeated recommendations from CSOs to establish a more coherent and enabling taxation framework, no progress was recorded in 2025.

Indicator 1.8.b – Proportion of private individuals who have given money to a CSO.

According to the World Giving Report - Türkiye⁶⁰ partner page, the more recent benchmark is no longer framed through the CAF World Giving Index ranking, but through direct survey findings on giving behaviour in 2025. The report presents data on the proportion of people in Türkiye who gave money by any means during 2025, including giving to charity, to a religious cause, or directly to people in need. It also separately tracks giving specifically to charity, alongside volunteering and giving goods. According to this, 49% of individuals provided support to charities, 54% gave money to a person or family in need and 22% gave money to a religious organisation or for a religious cause. These percentages were 57%, 51% and 30% in 2024 respectively.

Although not totally comparable, in 2024, according to the CAF World Giving Index, Türkiye ranked 122nd in the proportion of private individuals who gave money to a CSO, with the figure of 22%⁶¹. The data according to years are provided in the table below:

Year	Ranks	% of individual donations
2024	122 nd	22%
2023	126 th	18%
2021	75 th	25%

SO 1.9 | Tax benefits are available to CSOs.

Indicator 1.9.a – Extent to which applicable tax laws provide for the following:

- CSO income generated from grants, donations, and membership dues, income from economic activities, investment income, real property, gifts and inheritance is not subject to taxation;
- Any excess revenue or profit generated through economic activity and used for mission-related purposes by CSOs is not subject to corporate income/profit tax.

Year	Compliance
2025	3 – moderately meets standards
2024	3 – moderately meets standards
2023	3 – moderately meets standards
2021	3 – moderately meets standards

⁶⁰ Charities Aid Foundation (CAF), 2025

⁶¹ Charities Aid Foundation (CAF), 2024, p18.

No legislative reforms were introduced in 2025 to improve the tax regime applicable to CSOs, which remained restrictive. Donors continued to benefit from only limited tax incentives, while CSOs and their economic enterprises remained subject to significant taxation on income-generating activities. Amendments introduced at the end of 2024 to General Circular No. 1 on the Granting of Tax Exemption to Foundations⁶² continued to affect tax-exempt foundations throughout 2025. The amendments excluded transfers to economic enterprises and asset-building expenditures from purpose-related spending, making it more difficult for foundations to satisfy the requirement that at least two-thirds of their gross income be spent on public-benefit activities. They also introduced stricter conditions for maintaining tax-exempt status by requiring foundations to continuously meet the asset and income thresholds applicable at the time of application. For 2025, foundations were required to maintain income-generating assets of at least TRY 12.97 million (EUR 250,000) and an annual income of at least TRY 1.17 million (EUR 22,450), with these thresholds increasing annually in line with the revaluation rate. Since donation income is excluded from annual income calculations, many foundations face additional difficulties in meeting these requirements. As a result, concerns persisted that the revised framework places excessive financial and administrative burdens on tax-exempt foundations and increases the risk of losing tax-exempt status, thereby limiting their ability to pursue public-benefit activities.

SO 1.10 | The policies and legal environment provide incentives and facilitate volunteering for and employment in CSOs.

Indicator 1.10.a – Laws regulating volunteering are adopted.

Year	Compliance
2025	1 – does not meet standards
2024	1 – does not meet standards
2023	1 – does not meet standards
2021	1 – does not meet standards

No legislative reforms concerning volunteering were adopted in 2025, and Türkiye continues to lack a comprehensive legal framework governing volunteerism. Although the Directorate General for Civil Society Relations under the Ministry of the Interior launched a consultation process on draft legislation concerning volunteering in 2022 and collected feedback from civil society organisations, no further legislative progress was made during the reporting period. As of 2025, the draft legislation had neither been submitted to Parliament nor enacted, leaving longstanding regulatory gaps regarding the status, rights, and obligations of volunteers unaddressed.

⁶² Official Gazette, 2024

Indicator 1.10.b – Government volunteering strategies and programmes support volunteering for CSOs and have sufficient resources allocated for implementation.

Year	Compliance
2025	1 – does not meet standards
2024	1 – does not meet standards
2023	1 – does not meet standards
2021	1 – does not meet standards

As of 2025, Türkiye still lacked a national strategy or programme dedicated to promoting volunteerism. While no legislative progress was recorded during the reporting period, efforts initiated under the EU-funded and UNDP-implemented “Project on Strengthening Civic Engagement for Enhancing Democratic Local Governance in Türkiye” continued to provide a basis for future reforms. Building on a nationwide assessment of volunteerism, the project produced a “Volunteering Green Book”⁶³ and subsequently a “Volunteering White Book,”⁶⁴ both developed through extensive consultations with public institutions, civil society organisations, volunteers, and academics. These documents identified existing regulatory gaps and proposed policy and legal measures to strengthen volunteering in Türkiye.

Indicator 1.10.c – Proportion of CSOs that benefit from state employment strategies and programmes.

In 2025, only 3% of CSOs stated that their organisation had benefited from government employment programmes, similar to 3% in 2024, 2% in 2023 and 5% in 2021. The CSOs that stated that their organisation had benefited from government employment programmes expressed that the support received primarily consisted of employment and social security incentives rather than dedicated civil society support schemes. Participants referred to wage subsidies provided through Turkish Employment Agency (İŞKUR) employer support programmes, social security premium reductions, and discounts on employer contribution payments. One organisation also reported benefiting from support provided through a Regional Development Agency. Overall, the responses suggest that government employment support for CSOs mainly took the form of general labour market incentives available to employers rather than programmes specifically designed to strengthen civil society organisations.

	% CSOs saying they benefit from state employment strategies and programmes
2025	3%
2024	3%
2023	2%
2021	5%

⁶³ Civic Engagement Project, 2025a

⁶⁴ Civic Engagement Project, 2025b

Indicator 1.10.d – Proportion of CSOs that benefit from state volunteering strategies and programmes.

In 2025, no volunteering strategy or programme was in effect.

Indicator 1.10.e – Proportion of employees in CSOs in relation to the total workforce.

In 2025, the statistics regarding the total number of full-time workers in associations and the total number of paid workers in foundations could not be obtained through publicly available sources.

Indicator 1.10.f – Percentage of people who have volunteered to give their time to an organisation.

According to the World Giving Report - Türkiye⁶⁵ partner page, the more recent benchmark is no longer framed through the CAF World Giving Index ranking, but through direct survey findings on giving behaviour in 2025. According to this, 14% of individuals did unpaid, voluntary work either in their community or further afield, while this was 16% in 2024.

Although not totally comparable, the data according to CAF World Giving Index, for Türkiye and for previous years, are provided in the table below:

Year	Ranks	% of individuals who volunteered
2024	122 nd	10%
2023	126 th	9%
2021	99 th	10%

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⁶⁵ Charities Aid Foundation (CAF), 2025

Specific Objective 2: Strengthened cooperation and partnership between CSOs and public institutions.

SO 2.1 | Public authorities and institutions include CSOs in decision and policy-making processes.

Indicator 2.1.a – Laws, by-laws, strategies, other acts of public interest and policy reforms are effectively consulted with CSOs in that:

- ➔ CSOs have access to the draft document from the beginning of the drafting process to the end of the adoption procedure;
- ➔ At least 15 days are allowed for commenting before the draft document enters the adoption procedure;
- ➔ The use of extraordinary/expedited procedures to adopt legislation without allowing for consultation is an exception and duly justified;
- ➔ Reports on results of public consultations, including reasons for rejection of comments, are published in a timely fashion;
- ➔ Working groups members from CSOs are selected based on a public call, clear criteria and in line with equal treatment;
- ➔ Working group members from CSOs include representatives of society as a whole, including women's groups, LGBTIQ groups, migrant groups, minorities, disability groups, and others as appropriate, in line with the Human Rights Based Approach.

Year	Compliance
2025	1 – does not meet standards
2024	1 – does not meet standards
2023	1 – does not meet standards
2021	1 – does not meet standards

No legislative or institutional reforms were introduced in 2025 to strengthen CSO participation in decision- and policy-making processes. The existing legal framework governing public consultations remained largely unchanged and continued to provide public authorities with broad discretion over whether and how to engage civil society. The By-law on the Procedures and Principles of Drafting Legislation, which remains the primary legal basis for consultations, does not require the involvement of CSOs and lacks clear procedures, participation criteria, and safeguards to ensure meaningful and inclusive consultation processes. Under Article 6 of the By-law on the Procedures and Principles of Drafting Legislation, consultation with CSOs remains discretionary, while consultation with certain public institutions is mandatory only where required by presidential decrees. Article 7 further provides that, where the opinions of CSOs are requested, they are expected to submit their comments within 15 days. The minimum period for public institutions and CSOs to submit comments on draft legislation was reduced from 30 days to 15 days following the adoption of the 2022 By-law on the Procedures and Principles of Drafting Legislation.⁶⁶ If no opinion is submitted within the prescribed period, the draft

⁶⁶ Official Gazette, 2022; STGM 2022

is deemed to have received a favourable opinion. In practice, some public institutions do open draft laws and secondary legislation to CSOs for consultation and provide at least 15 days for submitting comments. However, the decision to consult CSOs and circulate draft legislation remains entirely at the discretion of the competent public authority, as there is no legal obligation to do so. As a result, existing legislation only regulates CSO participation in law- and policy-making “to a limited extent” and mainly through general consultation rules that do not even explicitly mention CSOs.

With regard to the CSO survey, the question used to assess CSOs’ involvement in effective consultation processes was revised this year to provide a more nuanced and detailed picture. The methodological change, dividing between whether or not CSOs had access to drafts and whether they had at least 15 days to respond, reveals a significant gap between participation and quality: while 32% of responding CSOs reported being involved in at least one consultation process either with full access to draft documents or 15 days to respond, this figure drops sharply to just 2% when the consultation process met both criteria simultaneously; indicating that meaningful, effective consultation is nearly non-existent.

Among the CSOs that reported involvement in consultation processes, 61% stated that this concerned civil society strategy-related issues, 47% government level, 47% municipal level, 44% EU accession-related issues and 40% parliamentary level.

Regarding the quality of these interactions, 10% of participating CSOs reported having had access to draft documents from the beginning of the drafting process to the end of the adoption procedure when dealing with governmental bodies. At the same time, 6% of participating CSOs stated that they had at least 15 days available for commenting on draft documents, a slight decrease from the 8% recorded in 2024.

Furthermore, participation in formal decision-making bodies remains low; approximately 8% of CSOs stated that a representative of their organisation was an active member of a government working group tasked with the development of laws, bylaws, strategies, or acts of public interest and policy reforms. While municipal-level engagement was slightly higher, with 14% of organisations participating in municipal working groups, the overall data suggest that systemic inclusion in high-level policy drafting has not seen substantial structural growth.

A deeper analysis of the thematic fields of responding CSOs holding seats in working groups shows that the clearest pattern concerns organisations working on public participation: not a single one holds a seat in a government working group (0%), yet they are the most represented group at the municipal level (19%). Gender equality and LGBTIQ+ organisations show a similar pattern: while nearly non-existent at the government level (2%, one of 53 organisations), comparatively well-represented in municipal working groups (13%). Some thematic areas find no access at either level: responding CSOs that work on humanitarian aid have zero seats at both government and municipal level working groups. Participating CSOs working on media and information are non-existent at government level and barely represented at municipal level (5%). Labour rights organisations have no government working group membership whatsoever (with 9% at municipal level), while CSOs working on public administration reform are similarly absent from government tables while comparably well represented at municipal levels (11%).

Survey Results

	% CSOs saying they were effectively consulted by authorities
2025	32% (only 2% when both effective consultation criteria are met)
2024	11%
2023	11%
2021	10%

In addition, CSOs participating in the focus group meetings and the interview confirmed that opportunities for CSO participation in decision- and policy-making processes remained limited and largely dependent on the discretion of public authorities. Participants noted that consultations often lacked meaningful follow-up, transparency, and accountability, with little information provided on how civil society input was considered. Several participants described consultation processes as largely formalistic, noting that authorities often collected opinions without providing responses or incorporating recommendations into policy outcomes.

Participants⁶⁷ also highlighted the limited effectiveness of existing consultation and dialogue mechanisms. While some ministries and public institutions continued to collect opinions through online platforms or consultation meetings, participants questioned whether these mechanisms had any real influence on policy outcomes. For example, participants referred to the Human Rights Action Plan consultation process prepared by the Ministry of Justice, noting that although a platform exists for CSOs to submit views, policies are often developed without meaningful civil society involvement. Similarly, participants reported that institutions such as the Turkish Human Rights and Equality Institution (TİHEK) regularly request information on CSO activities but are perceived as having limited independence and insufficient influence over government policies. One participant described raising concerns regarding child labour in vocational education programmes (MESEM) during a meeting with TİHEK, but was informed that the issue did not fall within the institution's priorities. Some participants referred to the Universal Periodic Review (UPR) process, noting that representatives of the permanent Delegation of Türkiye showed limited engagement with civil society organisations during preparatory meetings.

At the local level, participating CSOs in the focus group meeting reported relatively more positive experiences, particularly with municipalities led by opposition parties. Examples included cooperation protocols, participation in Local Equality Action Plans, and collaboration with municipal councils on gender equality initiatives. However, some participating CSOs in the same meeting noted that cooperation with local authorities has become more difficult following investigations targeting certain municipalities, with some reportedly avoiding engagement on politically sensitive issues, particularly LGBTIQ+ rights, due to concerns about administrative repercussions.

CSOs who participated in the focus group meeting also emphasised that consultation processes remained selective and lacked transparency. Although some ministries, including the Ministry of Family and Social Services, continued to hold meetings with CSOs, participants questioned the criteria for selecting invitees and reported that rights-based organisations were frequently excluded. They further noted that participation in parliamentary commissions and advisory bodies often depended on informal networks rather than transparent procedures. Concerns were also raised about the limited effectiveness of accountability mechanisms, including difficulties obtaining information through freedom of information requests and parliamentary petitions. One participant cited unsuccessful attempts

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⁶⁷ In the interview and in the focus group meeting.

to obtain data on the number of inspections of associations due to incomplete and uninformative responses from public authorities.

Moreover, the public institution representatives⁶⁸ acknowledged that structured consultation between public authorities and CSOs remains limited and largely dependent on individual initiatives rather than institutionalised mechanisms. In the public officials survey, while one participating public institution rated the effective consultation with civil society as “very effective”, two other organisations stated that it was “insufficiently effective” and “not at all effective”, while acknowledging the critical role of CSOs. Some participants noted that no consultations were conducted within the framework of the Ministry of the Interior’s civil society strategy and action plan in 2025. Participants highlighted shortcomings in fairness, equal access, communication, inclusiveness, and participation, noting that existing consultation and cooperation processes often fail to ensure meaningful involvement of diverse civil society actors. Several respondents also pointed to insufficient financial resources as a barrier to effective engagement. In addition, participants identified legal and administrative obstacles, including restrictive legislation, lengthy and complex approval procedures, and burdensome bureaucratic requirements, which hinder cooperation between public institutions and CSOs. One participating public institution stated that the lack of commitment and the highly politicised nature of public institutions are among the biggest obstacles to effective cooperation between public institutions and CSOs.

At the same time, some positive examples were highlighted, including consultation meetings organised under the Civic Participation Project implemented by UNDP, in seven pilot provinces, which were described as effective platforms for dialogue between public institutions and civil society. However, it was also emphasised that public-CSO cooperation continues to lack a stable and institutionalised framework and remains vulnerable to changes in leadership, political priorities, and personnel. In addition, particularly at the municipal level, public institutions employed a multi-channel approach - including digital platforms, workshops, and direct outreach - to involve CSOs in legislative and strategic planning processes. Key successes, such as the “Budget-It” gender equality project and the Tactical Urbanism Program, demonstrated that early stakeholder inclusion and field-based feedback effectively shape inclusive urban policies. To further enhance this participatory governance, institutions recommend establishing regular feedback loops on how CSO contributions are evaluated, expanding digital participation tools, and increasing support for organisations representing disadvantaged groups.

Indicator 2.1.b – CSOs are effectively included in oversight mechanisms.

This indicator was not assessed.

Indicator 2.1.c – Proportion of CSOs that have participated in consultations during preparation of state reports under international human rights and other legal obligations, and the implementation of treaty body recommendations.

This indicator was not assessed.

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⁶⁸ Participating in the public institutions survey and interview.

SO 2.2 | Public authorities and institutions acknowledge the importance of civil society in societal policy debate and EU integration processes.

Indicator 2.2.a – Extent to which CSOs assess the attitude of public officials towards civil society as supportive.

Year	Compliance
2025	1 – does not meet standards
2024	2 – minimally meets standards
2023	2 – minimally meets standards
2021	1 – does not meet standards

Over the years, the percentage of CSOs that have assessed the attitude of public officials towards civil society as supportive has remained low. In 2025, 17% of participating CSOs reported that they found the attitude of public officials towards civil society sufficiently supportive or very supportive, while it was 21% in 2024, 25% in 2023 and 18% in 2021.

It is important to note that comparisons with previous years should be interpreted carefully, as the indicator measured attitudes of public institutions towards CSOs in 2025, whereas earlier assessments focused on public officials' attitudes. In addition, in previous years the 'neutral' option was not offered to respondents, and its addition in the 2025 survey decreased the share of CSOs describing the approach of public officials as not supportive.

In addition, in the public institutions survey, while one participating public institution rated the attitude of public officials towards civil society as "very supportive", two other organisations stated that it was "insufficiently supportive" and "not at all supportive".

Survey Results

	% CSOs that assess the attitude of public institutions as supportive	% CSOs that assess the attitude of public institutions as not supportive
2025	17%	63% (+ 20% neutral)
2024	21%	79%
2023	25%	75%
2021	18%	82%

SO 2.3 | Public authorities contribute to civil society strengthening by cooperating with civil society through strategic policy frameworks and relevant institutional mechanisms.

Indicator 2.3.a – Proportion of CSOs that were effectively consulted in the preparation of civil society cooperation strategies.

As of 2025, no civil society cooperation strategy was in force. Although the Directorate General for Civil Society Relations (DGCSR) under the Ministry of the Interior had prepared a draft Civil Society Strategy Document and Action Plan covering the period 2023–2027⁶⁹ and opened it for public consultation in 2022, no further progress was reported regarding its adoption or implementation. Consequently, the draft strategy remained inactive throughout 2025, and no new policy framework or action plan was introduced to strengthen structured cooperation between public institutions and civil society organisations.

Indicator 2.3.b – IPA beneficiaries have adopted currently valid civil society cooperation strategies.

Year	Compliance
2025	1 – does not meet standards
2024	1 – does not meet standards
2023	1 – does not meet standards
2021	1 – does not meet standards

In 2025, there was no civil society cooperation strategy in effect.

Indicator 2.3.c – Civil society cooperation strategies are accompanied by adopted budgeted action plans.

Year	Compliance
2025	1 – does not meet standards
2024	1 – does not meet standards
2023	1 – does not meet standards
2021	1 – does not meet standards

In 2025, there was no civil society cooperation strategy in effect.

Indicator 2.3.d – Proportion of CSOs that rate civil society cooperation strategies as relevant and effective.

In 2025, there was no civil society cooperation strategy in effect.

Indicator 2.3.e – Public structures responsible for the implementation of civil society cooperation strategies are appropriately resourced.

In 2025, there was no civil society cooperation strategy in effect.

⁶⁹ Ministry of Interior, 2022

Indicator 2.3.f – Mechanisms for dialogue between civil society cooperation councils and central governments meaningfully include CSOs in that:

- ➔ they have an agreed programme of work
- ➔ they have agreed rules of procedure
- ➔ they meet regularly
- ➔ rules allow CSOs to call the meetings and contribute to agenda setting
- ➔ there is adequate follow-up to conclusions and recommendations

Year	Compliance
2025	1 – does not meet standards
2024	1 – does not meet standards
2023	2 – minimally meets standards
2021	2 – minimally meets standards

The Civil Society Consultation Council⁷⁰, established by the Directorate General for Civil Society Relations under the Ministry of the Interior, in accordance with the 11th Development Plan (2019–2023), remained inactive throughout 2025, with no concrete activities or outputs reported. Although the 12th Development Plan (2024–2028) continues to include references to strengthening civil society and public participation, no new institutional mechanisms were established during the reporting period to facilitate structured dialogue between CSOs and public authorities.

⁷⁰ Ministry of Interior, 2019

Specific Objective 3: CSOs' capacities and resilience to carry out their activities are reinforced.

SO 3.1 | CSOs' internal governance structures follow the principles of good governance.

Indicator 3.1.a – Proportion of CSOs that have an independent and effective governing body, with clear terms of reference to oversee the organisation's strategic goals, impact, management, legal compliance, and accountability.

Year		Compliance	%CSOs
2025		4 – meets most standards	97%
2024		2 – minimally meets standards	23%
2023		3 – moderately meets standards	56%
2021		2 – minimally meets standards	31%

This indicator was assessed differently in 2025. In previous years, the relevant question in the CSO surveys required that the effective governing body is appointed by the assembly, with no executive director or any other paid staff member of their organisation as a voting member of the governing body, and also that their organisation has a governing document, a statute, articles of association or similar founding document. This interpretation is a rather narrow and limited interpretation of an effective governing body, not only because it leaves out unregistered or small organisations or those with no paid staff, but also because organisations may have different means and methods of their own to select/appoint/decide their governing bodies, as well as conflict of interest measures. Therefore, in 2025, the question was formulated differently and inquired about the existence of a governing body (e.g. assembly, board or council responsible for oversight, legal compliance and accountability) together with a governing document (e.g. statute).

Consequently, the percentage of CSOs that responded positively to this question in 2025 was considerably higher than in previous years, with 97% of participating CSOs reporting an independent and effective governing body. According to the 2025 survey, 97% of participating organisations reported having both a governing body and a governing document.

Although the 2025 finding would justify a score of 5, considering the limitations of the survey and the new interpretation of the question this year, the compliance score is raised to 4 – meets most standards.

Survey Results

% CSOs saying they have an independent and effective governing body	
2025	97%
2024	23%
2023	56%
2021	31%

Indicator 3.1.b – Proportion of CSOs that regularly check potential conflicts of interest with regard to the political, economic and personal relationships of their governing body.

Year		Compliance	%CSOs
2025		3 – moderately meets standards	59%
2024		1 – does not meet standards	8%
2023		1 – does not meet standards	7%
2021		1 – does not meet standards	6%

This indicator was assessed differently in 2025. In previous years, the relevant question in the CSO surveys asked how often governing body members were signing a conflict-of-interest declaration, which is a rather narrow interpretation of the indicator standard, not only because it would leave out unregistered CSOs, but also because organisations may have different ways and means for assessing conflict of interest. Therefore, in 2025, the survey question asked how often organisations check for potential conflicts of interest in general. On this basis, the 2025 survey shows an improvement in regular conflict-of-interest screening, with the management of potential conflicts of interest within CSOs improving considerably in 2025 compared with previous years.

Some 56% of responding CSOs reported that they check potential conflicts of interest every year, 11% every two years and 3% more often than annually. This means that a total of 70% of CSOs periodically conduct such checks, while 59% of them do this annually or more often. A further 16% of responding CSOs conducted such checks only once upon a member's entry into the role. Nevertheless, 15% of organisations reported that they never assess potential conflicts of interest.

Overall, the findings suggest that a majority of CSOs with governing bodies have introduced at least some form of conflict-of-interest monitoring mechanism. At the same time, responses to the open-ended survey questions continued to reveal significant variation in organisational practices. While some organisations reported formal internal policies, ethical rules, and collective decision-making procedures aimed at preventing conflicts of interest, others indicated that such mechanisms remain informal or are not systematically applied.

Based on the respective change in interpreting the applicability of this indicator, the compliance score is now raised to 3.

Indicator 3.1.c – Proportion of CSOs that share relevant information on their organisation, using the means and channels that are accessible to all stakeholders in terms of publishing.

Year		Compliance	%CSOs
2025	➤	3 – moderately meets standards	45%
2024	➤	3 – moderately meets standards	41%
2023	➤	3 – moderately meets standards	42%
2021	➤	3 – moderately meets standards	44%

According to the 2025 assessment, the proportion of CSOs that share organisational information (governing document, governing body structure and the names of their governing body members) through their website is slightly above previous years. In 2025, the survey also asked CSOs if they publish this information on their social media channels, which is also an increasingly used publicly accessible medium. An additional 9% of CSOs reported that they use social media to publish all three types of information. This means a total of 54% of CSOs are actually providing relevant information about their organisation that is accessible to all stakeholders. However, to be exactly comparable, the compliance score takes into consideration only the percentage of CSOs doing this via website.

When examining individual transparency indicators, 62% of the CSOs stated that their organisation published their governing document (such as a statute) on their website, while 59% confirmed the publication of their governing structure. Furthermore, 59% of the CSOs explicitly stated that the names of the members of their governing body were made available on their website. These results indicate a positive shift towards digital transparency and a commitment to making foundational organisational data more accessible to stakeholders and the general public, however, as the share of CSOs publishing all three types of information via the website is used to interpret the indicator's compliance score, the 45% finding does not justify an increase; hence the score remains 3 – moderately meets standards.

Indicator 3.1.d – Proportion of CSOs that have an organisational gender equality policy.

Year		Compliance	%CSOs
2025	➤	3 – moderately meets standards	50%
2024	➤	3 – moderately meets standards	43%
2023	➤	3 – moderately meets standards	56%
2021	➤	3 – moderately meets standards	46%

In 2025, the proportion of CSOs with an organisational gender equality policy did not show any significant change compared with previous years. According to the CSO survey, 50% of participating CSOs reported having an organisational gender equality policy, compared with 43% in 2024, 56% in 2023, and 46% in 2021. The findings suggest that awareness of gender equality within organisational governance and internal policies remains relatively widespread among participating CSOs, although a significant proportion of organisations still operate without a formal gender equality policy.

Indicator 3.1.e – Proportion of CSOs that have an organisational strategy, including vision, mission and goals.

Year		Compliance	%CSOs
2025		4 – meets most standards	72%
2024		3 – moderately meets standards	60%
2023		4 – meets most standards	71%
2021		3 – moderately meets standards	59%

In 2025, there is a slight increase in terms of the percentage of CSOs that had an organisational strategy, strategic plan or similar strategy document of CSOs. According to the CSO survey, in 2025, 72% of the participating CSOs stated that they had an organisational strategy, a strategic plan or similar strategy document. The figure was 60% in 2024, 71% in 2023, and 59% in 2021.

SO 3.2 | CSOs are able to communicate the results of their activities to the public.

Indicator 3.2.a – Proportion of CSOs that have at least one online channel of communication.

Year		Compliance	%CSOs
2025		5 – fully meets standards	100%
2024		5 – fully meets standards	96%
2023		5 – fully meets standards	99%
2021		5 – fully meets standards	99%

In 2025, participating CSOs continued to demonstrate a strong online presence. According to the CSO survey, Instagram remained the most widely used communication channel, with 100% of organisations reporting that they used it regularly (at least once a month) to communicate about their work. This was followed by websites (74%), Facebook (73%), messaging applications such as WhatsApp, Signal, Viber, and Telegram (60%), and X (formerly Twitter) (54%). Other frequently used channels included LinkedIn (48%) and YouTube (40%). By contrast, Bluesky and TikTok were each used by 5% of participating organisations, while Spotify was used by 7% and Discord by only 1%. None of the participating CSOs reported using Mastodon, Threads, Reddit, or Snapchat as regular communication channels. Overall, the findings indicate that CSOs in Türkiye continue to rely heavily on digital communication tools, particularly social media platforms and websites, to engage with their constituencies and communicate their activities.

Indicator 3.2.b – Proportion of CSOs that have specialised communication staff.

This indicator was not assessed.

Indicator 3.2.c – Proportion of CSOs that cooperate with the media.

In 2025, the percentage of CSOs reporting partnerships with the media was lower than in the previous year, although the finding is not significantly different from the four-year average. In the 2025 CSO survey, 15% of CSOs reported partnerships with the media, compared with 19% in 2024, 16% in 2023 and 21% in 2021.

In previous years, the question related to this indicator asked only about partnerships with the media. This year, however, in addition to partnership, CSOs were also asked whether they consulted with the media. When this is also included, 58% of responding CSOs either consulted with or had partnerships with the media. While 15% of this was by way of partnerships, 42% was through consultation with the sector. However, this still means that 42% of participating CSOs had no such engagement with the media.

Survey Results

	% CSOs saying they cooperate with the media
2025	15%
2024	19%
2023	16%
2021	21%

SO 3.3 | CSOs are transparent about their programme activities and sources of funding.**Indicator 3.3.a** – Proportion of CSOs that publish their annual reports and financial statements.

Year		Compliance	%CSOs
2025	➤	3 – moderately meets standards	41%
2024	➤	2 – minimally meets standards	21%
2023	➤	2 – minimally meets standards	28%
2021	➤	2 – minimally meets standards	33%

The proportion of CSOs that publish their annual reports and financial statements on their organisation's website or in hard copy has shown an increase in 2025. According to the CSO survey, 41% of the CSOs stated that they published their annual reports and financial statements on their organisation's website or in hard copy. This figure was 21% in 2024, 28% in 2023 and 33% in the baseline assessment. In 2025, the survey also asked CSOs whether they publish these documents on their social media channels, an increasingly used publicly accessible medium. A further 2% reported that they use only social media to publish these two documents. When combined, the percentage rises to 43%; however, the compliance score is assessed only on the percentage of CSOs that publish these documents via website or hard copy.

The 2025 survey findings indicate that CSOs continue to publish and share organisational information through a variety of channels, although transparency practices vary considerably depending on the type of document. Among participating organisations, 43% reported publishing their annual activity reports on their websites, while 29% published their annual financial reports or statements online. In addition, 22% of CSOs shared annual activity reports with members in hard copy and 22% shared annual financial reports with members. Official government registers remained an important disclosure mechanism, with 52% of organisations reporting annual activity reports and 69% reporting annual financial statements through these channels.

More broadly, governance-related documents were the most frequently disclosed information. Some 62% of participating CSOs published their governing documents on their websites, 59% published information on their governing structures, and 59% disclosed the names of governing body members. By comparison, information relating to funding sources (28%), amounts received from each source (16%), and evaluation reports (32%) was published less frequently online. Research reports (42%), organisational policies (43%), and strategic documents (40%) were among the other commonly published materials.

The survey findings and focus group discussions suggest that many organisations continue to balance transparency considerations with concerns relating to security, political pressure, and administrative scrutiny. While a number of CSOs make annual reports and organisational documents publicly available through websites and social media, others prefer to share financial information primarily with members, donors, partners, or public authorities through official reporting systems. Participants noted that organisations working on human rights, gender equality, and LGBTIQ+ rights remain particularly cautious about publishing detailed financial information due to concerns about public targeting, harassment, and misuse of disclosed information. As a result, transparency practices often reflect efforts to comply with legal reporting obligations while managing security and reputational risks. Some other participating organisations noted that smaller organisations operating primarily through membership fees often have limited budgets, few or no paid staff, and may lack the capacity to prepare and publish detailed financial reports. Others reported publishing reports only periodically, for example every few years, or focusing their communication efforts on social media and outreach activities rather than formal reporting.

Indicator 3.3.b – Proportion of CSOs that publish information on their sources of funding and amounts received in the previous year.

Year		Compliance	%CSOs
2025		2 – minimally meets standards	24%
2024		2 – minimally meets standards	20%
2023		2 – minimally meets standards	27%
2021		2 – minimally meets standards	22%

Compared with previous years, there has been a slight increase in the proportion of CSOs that publish both information on their sources of funding and the amounts received via their website or in hard copy. In 2025, 24% of participating CSOs stated that they published both, while this percentage was 20% in 2024, 27% in 2023 and 22% in 2021. In 2025, the survey also asked CSOs whether they publish this information on their social media channels. A further 3% reported that they use only social media to publish these two types of information. When combined, the percentage rises to 27%; however, the compliance score is assessed only on the percentage of CSOs that publish this information via website or hard copy.

At the same time, 28% of participating CSOs reported publishing information on their sources of funding through at least one communication channel, while only 16% published information on the amounts received from each funding source. Some 36% of participating organisations stated that they did not publish information on either their funding sources or the amounts received. Participants identified several reasons for not publicly disclosing information on funding sources and amounts received and many of these reasons are quite similar to the reasons expressed under Indicator 3.3.a. In addition to concerns related to security, public targeting, and administrative scrutiny, some organisations noted that their limited budgets and reliance on membership fees or self-generated income made detailed financial disclosure less relevant. Others cited limited technical capacity and resources to prepare and publish financial reports. Some organisations reported sharing financial information only periodically, such as during general assemblies or with members, rather than making it publicly available on an ongoing basis.

Indicator 3.3.c – Degree of public trust in CSOs.

There has been no recent study conducted in 2025 on the level of public trust in CSOs. The only available source of information remains the 2024 Civil Society Perception in Türkiye Report⁷¹ that was prepared and published by the Civil Society Development Centre (STGM). The report presents a nuanced picture of public attitudes towards civil society in Türkiye. Based on a nationally representative survey of 3,040 respondents, the findings suggest that while public engagement with civil society organisations (CSOs) remains limited, perceptions of their role and contribution are generally positive.

The study indicates that CSOs enjoy a moderate level of public trust. According to the survey, 36.5% of respondents stated that they trust or strongly trust CSOs. In addition, 50% of respondents reported a positive perception of the overall trustworthiness and reputation of CSOs, while 64% considered them competent organisations. Perceptions of organisational capacity were also relatively favourable, with 58% expressing confidence in CSOs' management capacity and 57% in their communication capacity. Although the military emerged as the most trusted institution in the country, CSOs ranked comparatively well among public institutions and social actors.

Public understanding of civil society, however, remains relatively limited. Around 60% of respondents reported having either no knowledge or only limited knowledge of CSOs. Awareness was concentrated around a small number of highly visible organisations, particularly Kızılay (40%), AHBAP (19%), LÖSEV (19%), and Yeşilay (17%). When asked what civil society represents, respondents most frequently associated it with volunteering (33%), solidarity (32%), donations (29.5%), and assistance (26%), while concepts such as advocacy, democracy, and activism were mentioned far less frequently.

The report also highlights the weak level of civic participation. Approximately 77% of respondents stated that they had no relationship with any CSO, while only 4.1% reported being members of a civil society organisation and 7.7% reported being either members or volunteers. Participation was strongly correlated with education and income levels, suggesting that socioeconomic status remains a key determinant of civic engagement.

A notable finding concerns the impact of the February 2023 earthquakes. The survey indicates that the extensive involvement of CSOs in disaster response positively influenced public perceptions of civil society. Many respondents reported that the earthquakes helped them better appreciate the importance of CSOs and view their work more favourably.

71 STGM, 2024

SO 3.4 | CSOs monitor and evaluate the results and impact of their work.

Indicator 3.4.a – Proportion of CSOs that have carried out an evaluation of their work in the last year.

Year		Compliance	%CSOs
2025		5 – fully meets standards	82%
2024		4 – meets most standards	75%
2023		5 – fully meets standards	88%
2021		5 – fully meets standards	85%

The 2025 CSO survey indicates a continued commitment among participating organisations to assessing and reviewing their work. According to the survey, 82% of CSOs reported conducting at least one evaluation of a project, strategy, internal process, or similar activity during the reporting period, representing an increase compared with 2024 (75%), though remaining slightly below the levels recorded in 2023 (88%) and 2021 (85%). Project-level evaluations were the most common form of assessment, followed by reviews of internal processes and organisational strategies. The findings suggest that evaluation practices are relatively widespread among participating CSOs, particularly among organisations implementing donor-funded projects, which often require monitoring and evaluation mechanisms. At the same time, some organisations reported relying on informal self-assessment processes, including regular team meetings, activity reviews, and strategic discussions that are not always formally documented. A smaller group of CSOs indicated that they had not conducted any evaluation during 2025, most commonly due to limited organisational capacity, the absence of project-based activities, or financial constraints.

SO 3.5 | CSOs use research and evidence to underpin their work.

Indicator 3.5.a – Proportion of CSOs whose work is based on evidence generated through research.

Year		Compliance	%CSOs
2025		5 – fully meets standards	86%
2024		4 – meets most standards	78%
2023		5 – fully meets standards	91%
2021		5 – fully meets standards	88%

In 2025, 86% of participating CSOs reported that they undertook at least one type of research to inform their work, representing an increase compared with 2024 (78%) and approaching the levels recorded in 2023 (91%) and 2021 (88%). The most common research methods were field research (50%), surveys with specific groups (48%), desk research (48%), and focus group discussions (44%). Public opinion surveys were less common (16%), while randomised controlled trials were used by only 7% of organisations. Meanwhile, 14% of participating CSOs stated that they did not carry out any research in 2025. Overall, the findings suggest that evidence-based work remained relatively widespread among

participating CSOs, with organisations relying mainly on field-based, survey-based, desk-based, and qualitative research methods.

Indicator 3.5.b – Proportion of CSOs whose work is informed through consultation with people who have a stake in their current or future work.

Year		Compliance	%CSOs
2025		5 – fully meets standards	96%
2024		5 – fully meets standards	96%
2023		5 – fully meets standards	98%
2021		5 – fully meets standards	95%

This year, the relevant question for this indicator was designed differently from previous years, with a view to obtaining a more detailed understanding of CSOs' engagement practices. In the 2025 survey, the question asked about engagement in two separate forms, consultation and partnership, whereas previous years covered consultation only.

According to the CSO survey, the proportion of CSOs whose work was informed through consultation with the stakeholders covered for this indicator remained consistently high in 2025. Overall, 96% of participating CSOs reported consulting at least one of the seven stakeholder groups, a figure largely in line with previous years (96% in 2024, 98% in 2023, and 95% in 2021). An additional 2% of responding CSOs stated that they engaged with these stakeholders through partnerships only. When consultation and partnership practices are combined, nearly all (98%) of responding CSOs were engaged with people and groups who have a stake in their work.

The most frequently consulted stakeholders were members (89%), followed by local communities or constituencies (77%), local authorities and academic institutions (63% each). Consultation with public institutions (48%), private sector actors (44%) and national authorities (41%) was less common. The findings suggest that participating CSOs continue to rely primarily on their members, constituencies, and peer organisations to inform their work, while consultation with national-level authorities remains comparatively limited.

In addition, this year's survey included a question on CSOs' engagement practices with other CSOs: 73% of responding CSOs reported consulting other CSOs working in the same thematic area, and 68% CSOs working in different thematic areas.

SO 3.6 | CSOs work in fair and respectful partnership to achieve shared goals.

Indicator 3.6.a – Proportion of CSOs taking part in local, central and international CSO networks.

According to the 2025 CSO survey, 72% of participating CSOs reported being members of at least one civil society network, which is broadly in line with 2024 (73%), lower than 2023 (87%), and slightly higher than the 2021 baseline (71%). National networks remained the most common form of affiliation, with 55% of participating CSOs reporting membership in a national network. This was followed by international networks (40%) and local networks (33%). At the same time, 28% of CSOs stated that they were not members of any network. Overall, the findings suggest that network participation remained relatively stable compared with 2024, with national-level networking continuing to be the most common form of CSO cooperation.

Survey Results

	% CSOs taking part in local, central and international networks.
2025	72%
2024	73%
2023	87%
2021	71%

A further relevant finding on networking concerns partnership practices with other CSOs in Türkiye: 48% of respondents to the 2025 CSO Survey reported partnerships with CSOs working in the same thematic field, while 32% stated that they acted in partnership with CSOs from other thematic fields.

Indicator 3.6.b – Proportion of CSOs engaged in cross-sectoral partnerships with academia, social partners and private sector.

This year, the relevant question for this indicator was designed differently from previous years, with a view to obtaining a more detailed understanding of CSOs' engagement practices. In the 2025 survey, the question asked about engagement in two separate forms, consultation and partnership, whereas previous years covered consultation only. For this indicator, the data below provide statistics on partnership only.

Compared with previous years, the proportion of CSOs engaged in cross-sectoral partnerships with academia, social partners or the private sector decreased in 2025. According to the CSO survey, 46% of participating CSOs reported engaging in partnership with at least one of the three stakeholders: academic institutions, social partners, or private sector, compared with 60% in 2024, 64% in 2023, and 65% in 2021. However, with the addition of consultation as a separate category, an additional 45% of responding CSOs reported that they consulted with at least one of these stakeholders. When partnership and consultation are combined, the 2025 CSO survey shows that 90% of CSOs engaged in one way or another with academic institutions, the private sector or social partners.

When specific groups are concerned, academic institutions remained the most common cross-sectoral partners, with 34% of participating CSOs reporting such partnerships, followed by private sector actors (20%) and social partners, including trade unions and employer organisations (10%).

Survey Results

	% CSOs engaged in cross-sectoral partnerships
2025	46%
2024	60%
2023	64%
2021	65%

SO 3.7 | CSOs have a diversified funding base.

Indicator 3.7.a – Proportion of CSOs whose sources of donor income are diversified.

Year		Compliance	%CSOs
2025		3 – moderately meets standards	54%
2024		3 – moderately meets standards	57%
2023		4 – meets most standards	63%
2021		3 – moderately meets standards	53%

The 2025 assessment reveals a significant shift towards higher concentration in CSO funding sources compared with previous years. According to the data, 65% of participating CSOs reported receiving donor funding. 54% of these CSOs reported a diversified funding base, defined as having no single donor contributing more than 50% of their total budget. This represents a decrease from the 57% reported in 2024 and 63% in 2023 while remaining similar to 2021 with 53%. Conversely, 46% of CSOs relied on a single donor type for more than half of their annual budget, indicating an increased dependence on specific financial resources. Regarding organisations operating without donor funding, 35% of responding CSOs reported receiving no donor contributions in 2025.

In terms of specific donor types, the European Commission remains the most prominent source of funding, supporting 40% of the surveyed CSOs. This was followed by international CSOs (31%), the United Nations (23%), foreign private foundations (17%), and bilateral donors/foreign governments (15%). Domestic support levels were lower, with domestic private foundations (18%) and local government support (16%). National government funding was reported by 10% of organisations. Furthermore, several CSOs highlighted the importance of in-kind and technical support provided through EU-funded mechanisms, illustrating a continued reliance on international frameworks for both financial stability and institutional capacity building.

Indicator 3.7.b – Proportion of CSOs raising funds from sources other than donors (e.g. membership fees, corporate/individual giving and income generating activities)

Year		Compliance	%CSOs
2025		5 – fully meets standards	89%
2024		4 – meets most standards	80%
2023		5 – fully meets standards	86%
2021		5 – fully meets standards	89%

The 2025 assessment indicates an increase in the percentage of CSOs raising funds from sources other than donors. This year 89% of responding CSOs reported raising funds from sources other than donors; this was 80% in 2024, 86% in 2023 and the same percentage (89%) in 2021. Some 12% of CSOs reported that they do not raise funds from sources other than donors. In addition, 6% of CSOs stated that they do not raise funds from donors or alternative sources, and act only on a voluntary basis and in-kind donations/support.

According to the 2025 survey results, the most common source of non-donor funding remains membership fees, utilised by 63% of respondent CSOs. This is followed by individual donations (60%) and income generated from the organisation's own business, social enterprise, or service provision (29%). Furthermore, 20% of CSOs secured funding from private businesses, while income from assets was reported by 20%. Crowdfunding remains the least common method of self-financing, reported by 9% of organisations.

Overall, these findings highlight that while donor support remains critical, the vast majority of CSOs continue to sustain operations through a mix of community-based and internal resource mobilisation.

SO 3.8 | CSOs have effective, empowered and developed human resources.

Indicator 3.8.a – Proportion of CSOs that employ staff.

The 2025 assessment indicates a slight stabilisation in the employment trends of the sector following a sharp decline in previous years. In 2025, 48% of participating CSOs stated that they employed paid staff, categorised by ranges of 1-5, 6-10, or 11 or more employees. This represents a marginal increase from the 45% reported in 2024, though it remains significantly below the levels of 65% in 2023 and 67% in 2021.

According to the specific staffing distributions for 2025, 27% of surveyed CSOs stated that they had 1-5 paid staff members. Furthermore, 12% of the CSOs reported having a workforce of 11 or more paid staff, while 9% of the organisations employed between 6 and 10 staff members.

Participating CSOs that employ paid staff typically work with very small teams: most organisations rely primarily on volunteers and operate on extremely tight budgets. Older, established organisations are far better resourced: those founded before 2000 are roughly twice as likely to have paid staff compared with those set up after 2015. Istanbul-based organisations are the most likely to have salaried employees, while organisations outside the three major cities tend to run almost entirely on volunteer labour. Thematically, gender equality, LGBTIQ+ rights, and human rights organisations seem more able to recruit paid staff, while CSOs working on environment and climate are among the least likely to have paid staff but with nearly 97% volunteer engagement and large volunteer pools. Labour rights is the only area that remains weak on both dimensions, sitting below average on both paid staff and volunteer engagement.

These figures suggest that while the sector's overall employment capacity remains constrained, there has been a minor recovery in the proportion of organisations maintaining formal paid positions.

Survey Results

	% CSOs that employ staff
2025	48%
2024	45%
2023	65%
2021	67%

Indicator 3.8.b – Proportion of CSOs that have organisational human resources policies.

Year		Compliance	%CSOs
2025	➤	1 – does not meet standards	2%
2024	➤	1 – does not meet standards	0%
2023	➤	1 – does not meet standards	3%
2021	➤	1 – does not meet standards	0%

The 2025 assessment indicates a slight progress in the formalisation of internal governance and human resources standards compared with the previous year (0%). In 2025, 2% of participating CSOs reported having adopted all nine tracked policies (recruitment, diversity, equality and inclusion, gender equality, disciplinary, complaints, performance appraisal, redundancy, bullying and harassment, and safeguarding).

Among the specific internal policies reported in 2025, the diversity equality and inclusion policy was the most prevalent at 33%, followed by the safeguarding of children and vulnerable adults policy with 29% (24% in 2024) and the bullying and harassment policy with 27% (15% in 2024). Other implemented policies included grievance/complaints procedures with 25% (13% in 2024), recruitment policies with 24% (22% in 2024), and disciplinary policies with 21% (14% in 2024). Performance appraisal policies were adopted by 18% of the organisations (15% in 2024), while the adoption rate for redundancy policies remained consistent with 2024 at 7%. These findings suggest that while comprehensive adoption remains a challenge for the majority of the sector, there is an upward trend in organisations formalising protective and inclusive workplace standards.

Indicator 3.8.c – Proportion of CSOs that have advertised publicly their staff and volunteering vacancies in the last year.

This indicator was not assessed.

Indicator 3.8.d – Proportion of CSOs that have organisational policies encouraging recruitment of a diverse workforce.

This indicator was not assessed.

Indicator 3.8.e – Proportion of CSOs whose staff and volunteers have attended a training course in the past year.

This indicator was not assessed.



Bibliography

Short reference	Long reference
Amnesty International Türkiye, 2024	https://www.amnesty.org/en/latest/news/2024/11/turkiye-proposed-agents-of-influence-law-is-attack-on-civil-society-and-must-be-rejected/
Bianet, 2021	https://bianet.org/haber/fatf-turkiye-yi-gri-liste-ye-aldi-252180
Bianet, 2025	News coverage, https://bianet.org/haber/genc-lgbti-dernegi-mustehcenlik-id-diasıyla-kapatildi-314467
Bianet, 2026	https://bianet.org/haber/tarlabasi-toplum-merkezine-acilan-fesih-davasi-er-telendi-315847
Charities Aid Foundation (CAF), 2024	“CAF World Giving Index 2024”, https://www.cafonline.org/docs/default-source/inside-giving/wgi/wgi_2024_report.pdf
Charities Aid Foundation (CAF), 2025	World Giving Report, 2025, https://www.worldgivingreport.org/partners/turkey
Civic Engagement Project, 2025a	“Volunteering Green Book”, Prof. Dr. Murat Şentürk and Baran Can Karadoğan, Ankara, 2025: https://www.sivilkatilim.org.tr/wp-content/uploads/2025/02/Yesil-Kitap-R-6.pdf
Civic Engagement Project, 2025b	“Volunteering White Book”, Prof. Dr. Murat Şentürk and Baran Can Karadoğan, Ankara, 2025: https://www.sivilkatilim.org.tr/wp-content/uploads/2025/02/Beyaz-Kitap-R-8.pdf
CIVICUS, 2025	CIVICUS Monitor Watchlist, 2025, https://monitor.civicus.org/watchlist-july-2025/turkey/
Constitutional Court of Türkiye 2024/128	The ruling of the Constitutional Court annulling the final sentence of Article 10 of the Law on Collection of Aid, Rule No: 2024/128, Ankara, 2024: https://normkararlarbilgibankasi.anayasa.gov.tr/ND/2024/128?EsasNo=2023%2F181
Constitutional Court of Türkiye, 2024/11	The ruling of the Constitutional Court annulling the amendments made in the Law on Associations and Law on Collection of Aid in accordance with the Law on Preventing Financing of Proliferation of Weapons of Mass Destruction (Law No. 7262), Rule No: 2024/11, Ankara, 2024: https://normkararlarbilgibankasi.anayasa.gov.tr/ND/2024/11
European Commission against Racism and Intolerance (ECRI), 2025	ECRI Report on Türkiye (Sixth Monitoring Cycle), 2025, pp. 15-21, https://rm.coe.int/sixth-report-on-turkiye/1680b65698
European Commission, 2025	Türkiye 2025 Report, p.37: https://enlargement.ec.europa.eu/document/download/4bb4ddd1-4f20-4ee0-92db-926996ec8dd1_en?filename=t%C3%B-Crkiye-report-2025.pdf
European Federation of Journalists, 2024	https://europeanjournalists.org/blog/2024/11/07/turkey-efj-calls-for-withdrawal-of-foreign-agent-bill/
Freedom House, 2025	https://freedomhouse.org/country/turkey/freedom-world/2025

Short reference	Long reference
Freedom of Expression Association, 2025	The EngelliWeb 2025 report, https://ifade.org.tr/reports/EngelliWeb_2025.pdf
Haber Sol, 2025	https://haber.sol.org.tr/haber/mahkeme-valiligin-eylem-yasagini-iptal-et-ti-sarachane-gozalti-ve-tutuklamalarinin-dayanagi
Human Rights Association (İHD), 2026	Freedom of Assembly in Türkiye, 2026, https://www.ihd.org.tr/wp-content/uploads/2026/04/turkiye-de-toplanti-gosteri-ozgurlugu-raporu-2026.pdf
Human Rights Foundation of Türkiye (HRFT), 2025	Repression, Obstacles and Challenges Faced by Human Rights Defenders in Turkey in 2025, https://en.tihv.org.tr/wp-content/uploads/2026/01/2025-Yearly-Report_HRD.pdf
Human Rights Watch, 2025a	News coverage, https://www.hrw.org/news/2025/03/19/turkiye-istanbul-mayor-detained
Human Rights Watch, 2025b	News coverage, https://www.hrw.org/news/2025/05/08/joint-open-letter-social-media-companies-censorship-turkiye
ICNL, 2026	Türkiye Civic Freedom Monitor, updated June 2026, https://www.icnl.org/resources/civic-freedom-monitor/turkiye
International Center for Not-For-Profit Law (ICNL), 2026.	Türkiye Civic Freedom Monitor, updated in June 2026: https://www.icnl.org/resources/civic-freedom-monitor/turkiye
Kaos GL, 2025	Year of the Family: A Great Siege Against LGBTIQ+ People: LGBTIQ+ Human Rights Report 2025, https://kaosgl.org/haber/2025-te-lgbti-lara-buyuk-kusatma-dusmanlik-devlet-politikasina-donustu
Media and Law Studies Association (MLSA), 2025	FreeWebTurkey 2024–2025 Internet Censorship Report, https://mlsaturkey.com/images/RAPORLAR/ENG%20-%202025%20FREEWEBTURKEY%20INTERNET%20CENSORSHIP%20REPORT.pdf
Ministry of Family and Social Services, 2025	Presidential Council for Culture and Arts Policies, Family and Culture-Art Symposium, p.8: https://www.aile.gov.tr/media/316964/aile-ve-kultur-sanat-sempozyumu-bildiri-kitabi.pdf
Ministry of Interior, 2019	Civil Society Consultation Council: https://www.siviltoplum.gov.tr/sivil-toplum-istisare-kurulu
Ministry of Interior, 2021	Regulation on Amendments to the Associations Regulation, Official Gazette, No.31635, Ankara, 21 October 2021: https://www.resmigazete.gov.tr/eskiler/2021/10/20211021-3.htm
Ministry of Interior, 2022	Draft Civil Society Strategy Document and Action Plan (2023-2027), Ankara, 2022: https://www.siviltoplum.gov.tr/kurumlar/siviltoplum.gov.tr/PromoSlider/STKStr-ve-eylem-pln2022/Ek_1_Taslak_Sivil_Toplum_Strateji_Belgesi_ve_Eylem_Plani.pdf
Ministry of Interior, 2025a	Directorate General for Civil Society Relations, project calls and application guidelines: https://www.siviltoplum.gov.tr/kirsehir/2025-yili-proje-basvurulari
Ministry of Interior, 2025b	Associations With Public Benefit Status: https://www.siviltoplum.gov.tr/kurumlar/siviltoplum.gov.tr/istatistikler/Kamu-Yarari/KAMU-YARARI-STATUSU.pdf
Ministry of National Defence, 2025	List of CSOs supported from the 2025 budget of the Ministry of National Defence: https://www.msb.gov.tr/Content/Upload/Docs/Dernekler.pdf

Short reference	Long reference
Ministry of Treasury and Finance, 2024	“Press Release on Türkiye’s Removal from the Grey List”, Ankara, 28 June 2024: https://en.hmb.gov.tr/haberler/press-release-on-turkiyes-removal-from-the-grey-list
Ministry of Treasury and Finance, 2025a	General Government Budget Statistics: https://muhasebat.hmb.gov.tr/genel-yonetim-butce-istatistikleri
Ministry of Treasury and Finance, 2025b	Local Government Budget Statistics: https://muhasebat.hmb.gov.tr/mahal-li-idareler-butce-istatistikleri
Official Gazette, 2022	https://www.resmigazete.gov.tr/eskiler/2022/02/20220224-30.pdf
Official Gazette, 2024	https://www.resmigazete.gov.tr/28.12.2024
Parliamentary Assembly of the Council of Europe (PACE), 2024	https://pace.coe.int/en/news/9672/turkiye-pace-monitor-expresses-concern-at-dismissals-of-mayors-and-calls-for-dropping-of-foreign-agents-of-influence-bill
Reporters Without Borders, 2025	2025 World Press Freedom Index, https://rsf.org/en/index?year=2025
Revenue Administration, 2025	List of Foundations Granted Tax Exemption: https://cdn.gib.gov.tr/api/gibportal-file/file/getFileResources?objectKey=arsiv/yarlim-kaynaklar/yararli-bilgiler/vergi-muafiyeti-taninan-vakiflarin-listesi.pdf
STGM, 2022	Amendment of the "Regulation on Legislation Preparation Procedures and Principles" and Participation of Non-Governmental Organisations in Decision-Making Processes: https://www.stgm.org.tr/en/amendment-regulation-legislation-preparation-procedures-and-principles-and-participation-non
STGM, 2024	Civil Society Perception in Türkiye Report: https://www.stgm.org.tr/sites/default/files/2024-10/civil-society-perception-in-turkiye-2024.pdf
Truth, Justice, Memory Center, 2025	Freedom of Assembly in Türkiye, Fundamental Problems and Proposed Solutions: https://www.hakikatadaletihafiza.org/sites/default/files/2025-08/Tu%CC%88rkiye%E2%80%99de%20Toplanma%20O%CC%88zgu%CC%88r-lu%CC%88g%CC%86u%CC%88ne%20Dair%20Temel%20Sorunlar%20ve%20C%CC%A7o%CC%88zu%CC%88m%20O%CC%88nerileri%20Politika%20Belgesi_indexed_13.3.2025.pdf
TÜSEV, 2021	Implementation of Financial Action Task Force Recommendations and Their Impacts on Civil Society in Türkiye: https://tusev.org.tr/wp-content/uploads/2024/02/MaliEylemGorevGucuSivilToplum_26022021.pdf
UN Human Rights Council, 2025	Universal Periodic Review, Türkiye, 2025 recommendations, https://www.ecoi.net/en/file/local/2129659/g2508545.pdf
Union of Turkish Bar Associations, 2025	https://d.barobirlik.org.tr/2025/adli_yarlim_dagitim_tablosu.pdf



List of Laws Consulted

1.	Constitution
2.	Turkish Civil Code
3.	Turkish Penal Code
4.	Criminal Procedure Code
5.	Civil Procedure Code
6.	Law on Associations
7.	Law on Foundations
8.	Law on Meetings and Demonstrations
9.	Law on Collection of Aid
10.	Law on Relations of Associations and Foundations with Public Institutions
11.	Law on Amending Some Laws and Granting Tax Exemptions to Foundations
12.	Corporate Tax Law
13.	Income Tax Law
14.	Labour Law
15.	Law on Regulation of Publications on the Internet and Combatting Crimes Committed by Means of such Publications
16.	Law on Combatting Terrorism
17.	Press Law
18.	Law on the Establishment of Radio and Television Enterprises and Their Media Services
19.	Law on Prevention of Laundering Proceeds of Crime
20.	Law on Prevention of Financing of Terrorism
21.	Law on Preventing the Proliferation of Financing Weapons of Mass Destruction
22.	Greater City Law
23.	Special Provincial Administration Law
24.	Municipal Law
25.	By-law on Legislation Study Commissions
26.	The Rules of Procedure of the Grand National Assembly of Türkiye
27.	By-law on the Procedures and Principles of Drafting Legislation
28.	The Directive on Assistance to Associations from the Budget of the Ministry of the Interior
29.	Public Financial Management and Control Law
30.	By-law on Assistance to Associations, Foundations, Unions, Institutions, Organisations, Provident Funds and Similar Organisations from the Budgets of Public Administrations under General Administration



Comparative Scores Table per Indicator 2021-2025

		2025							2024							2023							2021						
		AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR
		SO1 - Enabling Environment for CSOs																											
1.1.a	Extent to which relevant domestic legislation provides for freedoms of association, assembly and expression	3	3	4	4	4	2	1	3	3	4	4	4	2	1	3	3	4	4	4	2	1	3	4	4	4	4	3	1
1.2.a	Extent to which CSOs have access to an effective remedy to challenge or seek review of decisions affecting exercise of their rights	3	4	4	3	4	2	2	3	4	4	4	4	3	2	3	4	4	4	4	3	2	3	4	3	4	4	3	2
1.2.b	Extent to which CSOs are protected by law from threats, attacks, judicial harassment and discriminatory treatment	3	2	4	3	4	2	1	4	2	4	4	4	3	1	5	2	4	4	4	3	1	5	3	4	4	4	3	1
1.3.a	Extent to which laws to combat extremism, terrorism, money laundering and corruption do not unduly restrict legitimate activities of CSOs	4	3	4	4	4	3	1	4	3	4	5	4	3	1	4	2	4	5	4	3	1	4	2	4	5	4	3	1

		2025							2024							2023							2021						
		AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR
1.4.a	Extent to which laws (1) do not require CSOs to submit more reports and information, and (2) do not submit CSOs to more inspections and sanctions, than business entities	5	5	5	5	5	3	1	5	4	5	5	5	4	1	5	4	5	5	5	4	1	5	5	5	5	5	4	1
1.5.a	Small community/local organisations and civic initiatives are allowed to operate by law without registering	5	4	5	5	5	5	2	5	4	5	5	5	5	2	5	4	5	5	5	5	2	5	4	5	5	5	5	2
1.5.b	In law, unregistered small community/local organisations and civic initiatives enjoy the same right to participation in decision making processes as registered CSOs	4	4	4	3	4	4	2	4	4	4	3	4	4	2	4	4	4	3	4	5	2	4	4	4	3	4	5	2
1.6.a	Extent to which relevant laws allow CSOs to seek a broad range of funding, including from abroad, without undue restrictions	5	3	5	5	5	4	2	5	3	5	5	5	5	2	5	3	5	5	4	5	2	5	4	5	5	4	5	2

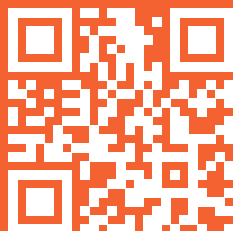
		2025							2024							2023							2021						
		AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR
1.7.a	The level of public funding available for CSOs and associations is clearly articulated in laws and regulations, and the rights and duties of the state body invested with the ability to set and revise the level of public funding available is clearly defined in law	1	2	4	5	2	2	1	1	1	4	5	2	2	1	1	1	4	5	2	2	1	1	1	4	5	1	2	1
1.7.c	Extent to which legal provisions regulating the award of public funding to CSOs ensure that it is clear, impartial and well regulated	4	2	4	3	2	2	1	4	3	4	3	2	2	1	4	3	4	3	2	2	1	3	3	4	3	2	2	1
1.7.d	Central governments make the information on awards publicly available and sufficiently detailed to identify individual awards	2	2	4	5	2	2	2	2	2	4	5	2	3	2	1	2	4	5	2	2	2	1	2	4	5	2	2	2
1.7.e	Proportion of CSOs indicating that the provision of domestic public funds is transparent, fair, and non-discriminatory	2	1	3	2	2	1	1	1	2	2	1	1	1	1	1	1	2	1	1	1	1	2	1	1	1	1	1	1
1.8.a	Tax legislation allows for tax relief as regards individual and corporate giving	2	3	5	5	3	3	2	2	3	5	3	3	3	2	2	3	5	4	3	3	2	2	3	5	4	3	3	2

		2025							2024							2023							2021						
		AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR
1.9.a	Extent to which applicable tax laws provide for appropriate tax benefits for CSOs	3	3	3	4	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3
1.10.a	Laws regulating volunteering are adopted	3	4	1	2	3	2	1	2	4	1	2	3	2	1	2	4	1	2	3	2	1	2	4	1	2	3	2	1
1.10.b	Government volunteering strategies and programmes support volunteering for CSOs and have sufficient resources allocated for implementation	1	1	2	3	3	3	1	1	1	2	1	3	3	1	1	3	2	1	3	3	1	1	3	2	1	3	2	1
SO 2 - Cooperation Between Government and CSOs																													
2.1.a	Laws, bylaws, strategies, other acts of public interest and policy reforms are effectively consulted with CSOs	3	2	3	3	2	2	1	3	2	3	4	2	2	1	3	2	3	4	2	1	1	3	2	3	4	2	2	1
2.2.a	Extent to which CSOs assess the attitude of public officials towards civil society as supportive	1	1	2	3	1	1	1	3	1	2	1	1	1	2	2	2	2	1	2	1	2	2	1	2	1	1	1	1
2.3.b	Currently valid civil society cooperation strategies are adopted	1	2	1	5	5	5	1	1	1	1	5	5	5	1	5	1	5	5	5	5	1	5	1	5	1	1	1	1
2.3.c	Civil society cooperation strategies are accompanied by adopted budgeted action plans	1	2	1	5	4	4	1	1	1	1	5	3	1	1	1	1	5	5	3	5	1	1	1	5	1	1	1	1

		2025							2024							2023							2021							
		AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR	
2.3.f	Mechanisms for dialogue between civil society cooperation councils and central governments meaningfully include CSOs:	2	1	1	3	5	2	1	3	4	1	1	1	3	1	4	4	3	1	1	4	2	4	4	3	3	5	1	2	
SO 3 - Capacity and Accountability of CSOs																														
3.1.a	Proportion of CSOs that have an independent and effective governing body with clear terms of reference	3	4	4	4	4	4	4	3	3	3	2	3	3	2	4	3	3	3	3	3	3	3	3	3	3	3	2	3	2
3.1.b	Proportion of CSOs that regularly check potential conflicts of interest with regard to the political, economic and personal relationships of their governing body	3	2	3	3	2	2	3	2	1	2	1	1	1	1	2	1	2	1	1	1	1	1	1	1	2	1	2	1	1
3.1.c	Proportion of CSOs that share relevant information on their organisation using means and channels that are accessible to all stakeholders	2	1	2	3	2	1	3	1	2	1	2	2	1	3	1	1	1	1	3	1	3	2	2	2	2	2	1	3	
3.1.d	Proportion of CSOs that have an organisational gender equality policy	3	3	3	2	3	3	3	3	2	3	2	2	3	3	3	2	3	2	2	2	3	3	2	3	2	2	3	3	

		2025							2024							2023							2021						
		AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR
3.1.e	Proportion of CSOs that have an organisational strategy, including vision, mission, and goals	4	4	4	3	5	4	4	4	4	4	4	4	4	3	4	4	4	3	4	3	4	4	3	4	3	5	4	3
3.2.a	Proportion of CSOs that have at least one on-line channel of communication	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5
3.3.a	Proportion of CSOs that publish their annual reports and financial statements	3	3	2	4	4	3	3	2	2	1	2	3	2	2	2	3	2	2	3	2	2	3	3	3	3	4	3	3
3.3.b	Proportion of CSOs that publish information on their sources of funding and amounts received in the previous year	3	3	2	3	3	2	2	2	2	2	2	2	2	1	2	2	1	2	2	1	2	2	2	2	2	2	2	2
3.4.a	Proportion of CSOs that have carried out an evaluation of their work in the last year	5	5	4	4	5	5	5	5	5	4	5	4	4	4	5	5	4	4	5	4	5	5	4	4	4	4	5	5
3.5.a	Proportion of CSOs whose work is based on evidence generated through research	4	5	4	4	4	4	5	5	4	5	4	4	4	4	5	5	4	5	4	4	5	5	4	5	4	4	5	5
3.5.b	Proportion of CSOs whose work is informed through consultation with people who have a stake in their current or future work	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5

		2025							2024							2023							2021						
		AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR
3.7.a	Proportion of CSOs whose sources of donor income are diversified	4	4	3	3	3	4	3	3	3	3	3	3	3	3	3	3	3	4	3	4	4	4	4	3	3	3	3	4
3.7.b	Proportion of CSOs raising funds from sources other than donors	3	5	3	3	4	4	5	3	4	3	3	4	4	4	4	4	3	3	4	4	5	4	4	4	3	5	4	5
3.8.b	Proportion of CSOs that have organisational human resources policies	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1



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