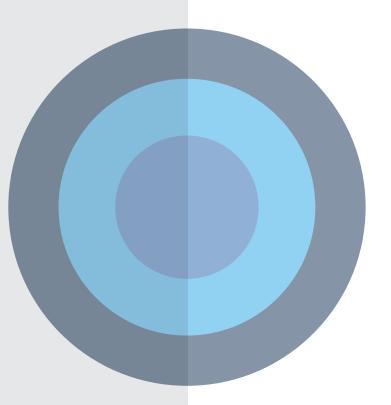
A case study of the European Fund for the Balkans PONDS, FUNDING POENGTHS STREN

European Fund for the Balkans



Authored by Lisa Marie Salley (Kumquat Consult) for the Network of European Foundations.

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Methodology

To effectively and independently gather data for this case study, consultants carried out 10 interviews with the partner foundations, management staff, supporting organisations and grantees. They also thoroughly reviewed internal and public documents concerning the EFB.

1. EXECUTIVE SUMMARY

The European Fund for the Balkans (EFB) was created in 2008 as a direct outcome of the International Commission on the Balkans. Set up to provide flexible funds to pro-European constituents, the EFB supports reforms across the region on the road to European accession.



At that time, as US foundations shifted their focus away from Eastern Europe, European foundations began building an entry gate for further support to the region through the EFB. Led by four foundations (Compagnia di San Paolo, ERSTE Foundation, the King Baudouin Foundation and Robert Bosch Stiftung), the EFB is a long-term European effort to bring Western Balkans countries closer to the European Union.

Now ten years later, the EFB's vision and work for a united Europe are alive and strong. In a political context that no longer prioritises EU accession, the EFB upholds the long-term prospect of the Western Balkans at the heart of a thriving and coherent Europe.

Working in a regional collaborative fund has allowed the foundations involved to create a rich partnership, strengthening each other's reach and impact. Thanks to a team working consistently on the ground, the foundations enjoy grassroots access to a vast regional network, benefiting their work beyond even the EFB. By pooling funds for a common mission, the EFB successfully built bridges between Western Balkans societies and Europe.

This case study shows what made the EFB work: from its strong beginning and unique position to its extensive community, and its ability to adapt to the complex context of the region. It draws key lessons from the fund's 10 years of work, and will inspire others to do the same. The keys to the EFB's success were its ability to create a strong core partnership and positive personal relationships from the start; making a long-term investment; openness to further collaboration; flexibility; and empowering local people.

The "Pooling funds, pooling strengths" series shows the benefits of collaborative funding. This case study will inspire readers with the power of European collaboration in a complex geopolitical context.

2. FOREWORD

When European foundations set up the European Fund for the Balkans ten years ago, Europe was a very different place than it is today. Then, we were optimistic about the accession of the Western Balkans countries to the European Union.
We had confidence that the wounds and division left by the Yugoslav Wars would be overcome and the benefits of democracy would spread throughout the region.
We set up the EFB to support these developments, to reconnect people torn apart and separated by borders between the countries in the region and the rest of Europe.



The work of the EFB over the last ten years has contributed to building a strong regionwide group of committed democrats, working in think tanks, government offices and civil society organisations. A strong regional team works in the Secretariat, drawing from a wide network in and outside the region and collaborating with a wide range of EU and regional decision-makers. And yet, we see the forces of nationalism, autocracy, illiberalism on the rise, and the region again becoming a playground for geo-political interests with the influence of progressive and democratic forces receding.

It is timely and important to reflect on the benefits, achievements and lessons learnt from a European collaborative effort such as the EFB. This case study looks at the strengths but also challenges of our common effort. It presents key lessons learnt for others to take note and to be inspired to join efforts of community, society and spirit-building not just in the Western Balkans, but anywhere in the world where the freedom of people and the growth of a strong and resilient civil society is threatened.

Hedvig Morvai Executive Director European Fund for the Balkans **Franz Karl Prueller** Chair European Fund for the Balkans

The Network of European Foundations (NEF)

NEF is an association of leading European foundations dedicated to strengthening philanthropic cooperation.

We fund and support civil society in its work for social inclusion, democracy and international development – at the European and global level.

We work in partnership with foundations, non-profit organisations, government institutions, and more.

We aim at better and more strategic collaboration between foundations, and our mission is to realise European solidarity through philanthropy for social inclusion, international development and democracy.

The "Pooling funds, pulling strengths" series

To celebrate NEF's 40th anniversary, this case study series will illustrate European philanthropies at their best: joining forces to grow their impact and deliver unique results. Each case study will show how collaborations between foundations were developed and incubated with NEF's support. By reading about the design, approach, advantages and challenges of each collaborative, foundations will discover how they too can benefit from working more closely together.



Source: EFB/Jovo Marjanovic

3. A BRIEF HISTORY AND OVERVIEW



THE CONTEXT OF THE EFB'S BIRTH

In 2008, almost 10 years after the Yugoslav Wars – which saw the worst political and humanitarian violence Europe had seen since World War II –, the European Union was moving towards further enlargement. Western Balkans nations were largely optimistic about joining the EU.

Despite significant efforts by international foundations and NGOs, a large gap remained in preparing the region to reach the Copenhagen Criteria and become part of the EU. Meanwhile, the United States had largely shifted their focus to the Middle East, and were preparing to withdraw a large part of their support from the region.

SETTING UP THE EFB

The EFB was born in 2008 as a direct outcome of the International Commission on the Balkans (2004-2006): a gathering of senior decision-makers, international foundations and policy experts set up to create a vision for the integration of countries from South-East Europe into the European Union. The commission's 2005 report outlined a series of recommendations to both governments from the region and the international community. The EFB was established to implement these recommendations, including to provide flexible funds to pro-European constituents and support various reforms within the region.

This initiated a major drive by European foundations (Compagnia di San Paolo, ERSTE Foundation, the King Baudouin Foundation and Robert Bosch Stiftung) to work together and fund work in the region under one name. While American foundations were preparing to exit the region, European foundations started building an entry gate for further support.

The EFB's vision and work for a united Europe are alive and strong. In a political context that no longer prioritises EU accession, the EFB upholds the long-term prospect of the Western Balkans at the heart of a thriving and coherent Europe.

"The guiding idea for developing the fund was a full commitment to bring the Western Balkans closer to the EU, and bring the EU closer to the Western Balkans, building bridges between them to communicate, create dialogue and exchange." HEDVIG MORVAI, EXECUTIVE DIRECTOR, EFB

Strategic objectives: Three complementary pillars

Capacity development To develop the Western Balkans' social capacity focused on the regions' democratisation and EU accession process by working with public administration, government ministries and policy-orientated civil society organisations (CSOs).

Policy development To develop a knowledge base with the aim of improving policy making to strengthen democratic institutions and civil society, while also developing evidence to show the benefits of Europeanisation to the region and to the EU.

Regional development To develop a culture of regional cooperation, supporting key political infrastructures in the process of democratic consolidation, and encourage innovative networking in the region.



Source: EFB

4. THE ADDED VALUE OF A POOLED FUND

The European Fund for the Balkans provides great value to all involved. For member foundations, it's a rich partnership giving them greater access to the region and a way to communicate differently. For civil society, experts, governments and institutions in the Western Balkans and across Europe, it builds bridges to share information and coordinate action.



A RICH PARTNERSHIP FOR MEMBERS

Historically, European foundations had focused on a particular issue or niche. Each foundation also had its own cultural background, area of focus, and approach to its work. This diversity made pooling their efforts unlikely.

Yet member foundations recognised the potential value of joining forces under a single entity with one mission: it would strengthen one another's regional reach and impact. Through intentional and continuous deliberation and compromise, founders built mutual trust and created a smooth and complementary operating system: foundations would have a clearly-defined strategic role, while the Secretariat, the experts on the ground, would have the independence to make quick decisions and adapt to a challenging and evolving context.

This way, foundations not only benefited from pooling their financial resources but also their knowledge, expertise and analysis networks, enriching their work in the region and beyond.

"The cooperation between our foundations involved the pooling of networks and experiences — not just financial resources. We each approached it from a different point of view, and by combining these we were more effective in reaching our goal to bring the Western Balkans countries closer to the European Union" FRANZ KARL PRUELLER, ERSTE FOUNDATION

Challenge

While it was essential to create a strong core partnership, the involvement of four prestigious foundations gave an impression of exclusivity to other funders potentially interested in the region. Some have reported that this limited the option of expansion. The EFB still works to rectify this aspect today, and hopes to involve a wider range of funders in the future.

ACCESS AND COMMUNICATING DIFFERENTLY IN THE REGION

A pooled regional fund enables member foundations to access a highly experienced knowledge network in a complex environment. The EFB employs highly skilled, trusted, and nonpartisan staff members. They come from the region, work at the EFB's office in Serbia, and provide tailored expertise to member foundations – often beyond the work of the EFB alone.

In addition, the EFB generated a notable community across the entire region: its former staff, as well as a network of supporters in public administrations, ministries and across civil society. This regional support network provides unhindered access to knowledge, analysis and contacts. This provides local expertise to all foundations (especially those with no regional office), helping them respond to real needs.

Working in the EFB, partners were able to access this region-wide community and communicate a new, dynamic and positive message to the region.

"At one point, I joked that they were the KBF office in Belgrade and we were the EFB office in Brussels" FABRICE DE KERCHOVE, KING BAUDOUIN FOUNDATION

BUILDING BRIDGES

Previously, no dynamic and inclusive regional actor existed in the Western Balkans. The EFB was the first cross-cutting community and policy actor in the region. Its programmes and initiatives built three sorts of bridges: between Western Balkans experts and EU decision-makers; between the Western Balkans and Member States' capitals; and between Western Balkans citizens and the European ideal.

Bridging Western Balkans experts and EU decision-makers

The EFB started linking networks of EU-level experts and decision-makers with experts in the Western Balkans. This creates an effective link of knowledge and analysis between the European institutions and Brussels policy circles on the one hand, and their counterparts in Western Balkans States on the other hand.

At first, this process was supported by the partner foundations. The EFB quickly cultivated a strong presence in Brussels, and today its events easily welcome over 100 attendees regularly – in addition to having cultivated a true policy and decision-making community.

Through the "Balkans in Europe" TV debate, broadcast from the European Parliament, the EFB brings together Members of the European Parliament, EU Commission officials, and experts/analysts from the Western Balkans to discuss pressing policy issues. Constantly finding more innovative ways to communicate about the realities of the Western Balkans, the EFB has effectively reminded the EU of the Western Balkans' relevance to the continent, and promoted a continued effort towards EU accession.

"The EFB symbolises an awareness among European actors of the need — and what's more, the responsibility — to contribute to the completion of the unfinished European project" IVAN VEJVODA, FORMER EXECUTIVE DIRECTOR OF THE BALKAN TRUST FOR DEMOCRACY, THE GERMAN MARSHAL FUND OF THE UNITED STATES

Bridging the Western Balkans and Member States' capitals

As the context evolved, the EFB realised it also had to work directly with national governments. Through its extensive network of foundations, the EFB spread the word across Europe about their goals and work. The EFB organised events in capitals such as Vienna and Berlin, focusing on the Western Balkans, their European identity and future EU integration.

This way, the EFB enriched their "market" of people and ideas, building support for their work. By presenting strategic policy research on issues related to EU accession, carrying out extensive networking activities and advocacy visits and connecting civil society actors with national decision-makers, relevant actors in Member States have come to know the reality of public opinion, local policy and challenges in Western Balkans States.

Bridging Western Balkans citizens and the European ideal

Finally, the EFB supported and strengthened pro-EU constituencies in the region. The EFB worked hard to maintain national public opinions' interest in the EU across the region, despite the challenges related to accession.

A strong appetite for European values has been – and remains – critical for Western Balkans States' path towards EU accession, as does public knowledge that the EU has not "abandoned" the region. The EFB made significant efforts to strengthen and maintain this bilateral relationship from both perspectives.

Challenge

In recent years, surveys of public attitudes towards EU accession in the Western Balkans showed decreasing support for EU membership. This is unsurprising, considering that accession has become a moving political target. The EFB has continued its efforts to promote a positive and hopeful attitude towards Europe through various outreach initiatives, including TV debates and grants to civil society.

5. WHAT MADE THE EFB WORK?

In 10 years, the European Fund for the Balkans has become a well-known and trusted actor in the region. It grew beyond expectations with three prestigious flagship programmes, several innovative initiatives, a community of over
220 young leaders and 190 skilled government officials, over 100 international events and 95 supported think tanks. Its success positively impacted many, including in the region, in national capitals and in Brussels.



What made the EFB work was its privileged beginning, its position as a regional actor, its strong support network and its flexibility and ability to adapt to the context.

A PRIVILEGED BEGINNING

From the very beginning, the EFB received precious support from member foundations and the staff it hired.

The involvement of powerful European foundations, each with recognised expertise and large networks spread across Europe, gave the EFB instant access to European institutions and their decision-makers. Member foundations also had previous experience working in the region. They brought their deep understanding of the region, its culture and its specific needs to the EFB.

Founding staff were activists from across the region, who had worked towards EU integration and gave the EFB access to a large network of local expertise from the outset.

This uniquely strong combination – local knowledge and international backing from passionate, motivated experts and activists – shaped the EFB's success.

"The EFB wasn't a brand, but it had big brands behind them. It had a privileged position to start with, as EU players knew the founding foundations. Therefore, they immediately had access to decision-makers in Brussels" NENAD ŠEBEK, FORMER EXECUTIVE DIRECTOR OF THE CDRSEE

Challenge

The exit of Compagnia di San Paolo from the EFB had a significant impact. The Italian foundation had brought resources and experience, the loss of which was evident. In response, the EFB streamlined and adapted its activities to ensure continued results with a more limited partnership.

A UNIQUE POSITION

The EFB took on a unique shape as a regional actor (very few of which existed, or indeed exist today) benefiting from a relatively narrow focus. The EFB avoided identifying with any particular country, ensuring that each country could be represented in every initiative.

As a branch of NEF, the EFB is viewed by regional actors as a neutral body with strong regional connections. **This pricelessly allows navigating disputes and national politics with relative ease.** While the EFB is based in Serbia, staff travel regularly around the region and are clearly non-partisan, ensuring that foundations and staff involved remain independent in regional disputes. In a complex and dispute-prone environment, this is vital to maintain good relationships with all actors.

The EFB has a **strong grassroots pulse**, with a staff of former regional activists who have a strong understanding of the history and complexity of governments and civil society in the region. From the early days, the EFB used this rich knowledge to develop its understanding of each country's specific needs, political context, challenges, and learnt how to support each country's unique journey towards EU accession.

The EFB could be considered as a **non-governmental regional cooperation tool**. Equally focused on each country, the EFB prides itself on being open to all those in the region in the very same way, acting as a bridge for all countries, promoting regional cooperation while facilitating dialogue with the EU institutions and Member States.

These three elements – deep connections but neutrality, grassroots pulse, and a nongovernmental cooperation tool – made the EFB the unique actor it is, and allowed it to sculpt programmes and initiatives that continue to have a strong impact on the region's own internal collaboration and relationship with the European Union.

Challenge

It proved particularly challenging to work across borders in a region with persistent bilateral disputes and a partly violent history. However, the EFB's unique position as a trusted go-between for many different sides of those conflicts allowed it to navigate these disputes, and create bridges between the region's countries.

The Balkans in Europe Policy Advisory Group (BiEPAG)

In 2013, the EFB and the Centre for South-Eastern European Studies at the University of Graz set up BiEPAG: the first informal regional think tank in/about the Western Balkans to publish papers and analysis addressing regional issues.

The group was a response to the EU's clear disengagement from the region, and the resulting silence from civil society and existing think tanks. BiEPAG filled a gap in research on topics such as democratic standards and economic development.

Several stakeholders interviewed for this report feel BiEPAG has become an influential policy voice at the EU level, in the Western Balkans region, and in individual Western Balkans States. Their analysis primarily targets EU institutions and Member States, and to a lesser extent the region's own national governments.

Up to 20 members meet quarterly to determine what issues the group should address. Former members include Nikola Dimitrov, Macedonia's current Minister of Foreign Affairs, and advisors to the Prime Minister of Albania and to the Prime Minister of Macedonia. The research produced by the group is seen as highly credible due to the reputation of those involved and that of the EFB itself. BiEPAG research informs decision-makers about the process of EU accession, its latest developments, and how it can be taken forward to achieve real change in the region.

One achievement of BiEPAG's is its penetration of the Berlin Process: the Member State-led initiative to continue Western Balkans States' EU integration. Through the Berlin Process, the group introduced a study on bilateral issues and conflicts and how they were hindering EU accession. Following this study, the Austrian government led foreign affairs ministers from each Western Balkans State to pledge that they would not allow the disputes to hinder EU accession for any country. As a result, the Western Balkans six Ministers of Foreign Affairs signed the declaration drafted by BiEPAG at the Western Balkans Summit in Vienna in 2015.

"The real benefit of BiEPAG is that instead of the many international experts looking at the region through a geopolitical lens or with a wartime paradigm, those involved in the group are from the region. They know the nitty gritty of what's happening on the ground, and why" SRDJAN CVIJIĆ, OPEN SOCIETY EUROPEAN POLICY INSTITUTE

Think & Link Programme

The flagship Think & Link Programme has supported 150 researchers and 95 organisations and projects on topics of importance to EU accession.

Previously, the programme focused on capacity-building at the national level; now, it supports cross-border projects involving two or three organisations. Projects must not be specific to any one country, and must produce added value for other, connected issues too.

The programme also offers grantees an advocacy platform to present their findings, both in the region and in Brussels.

Stakeholders report that as a donor, the EFB is flexible and willing to learn from the experience of grantees.

Through the programme, the EFB is able to connect with and build a strong community of civil society actors.

THE EFB COMMUNITY

The EFB focused on relationship-building and strengthening the fund's human capital. By recognising the work of specific individuals from both civil society and the civil service, the EFB shaped a community of actors from across the region who continue to support the fund throughout their career. Through the Fellowship and Think and Link Programmes (among others), the EFB gathers alumni and harnesses their support to shape its own future direction.

"The EFB Founders believed and likely still do that fundamental change begins with individuals being inspired, challenged, and allowed to pursue and push their own efforts for reform in their respective countries" KRISTIE D EVENSON, EFB EVALUATION 2013



Source: EFB/Jovo Marjanovic

The Fellowship Programme

The fellowship targets up-and-coming mid-level officials working in public administration across the Western Balkans. The year-long programme provides fellows with training, including in language skills, and a three-month placement in government ministries across Europe.

In a perspective of reconciliation, fellows are asked to produce a team project based on their experience and present it in one of the countries of the region. This experience contributes to breaking down cultural boundaries as participants create and work across borders.

The development of public administration capabilities is a strict requirement in the EU accession process, but most remain underdeveloped in the region as civil service staff suffer from a lack of training. Therefore, this experience is priceless for young fellows to understand what constitutes an effective political and administrative environment.

The Fellowship Programme's alumni network has been highly effective. Fellows report that they can find contacts in any institution throughout the region, something that has supported their work far beyond the fellowship. The EFB works to cultivate these networks through events and trainings on the rule of law, political negotiation, and integration – which alumni seem to find very helpful.

Many alumni have continued working within the EFB as members of BiEPAG, or are supported through the Think and Link Programme.

STAYING FLEXIBLE AND RELEVANT

The EFB demonstrated its sense of innovation and adaptability over the last 10 years. It managed to keep making its vision and work relevant, despite the complex – and at times stagnant – environment around EU accession. The EFB's flexibility and adaptability stem from its on-the-ground network, its unique position, and can be seen in its grant-making work.

"At any given moment, the EFB can act. They are flexible. Donors are often too big to do this while civil society don't have the remit, working instead from project to project. But the EFB is elastic." SRDJAN CVIJIĆ, OPEN SOCIETY EUROPEAN POLICY INSTITUTE

Challenge

In 2014, the European Commission announced that no further EU accession would take place before 2019. This dealt a serious blow to the optimism felt across the region since 2008. From 2014 onwards, the EFB focused and adapted its work to continue building a European constituency in the Western Balkans, despite a vastly different political context.

Refocusing the mission

As the Western Balkans completely dropped off the EU agenda, many actors lost motivation across the region. In response, the EFB refocused and reorganised its attention to increase its impact in this new environment.

Also dealing with a loss of resources (which curtailed its freedom to experiment), the EFB refocused on learning from what had been achieved so far, and strategically refocused its activities.

To influence policy-making from within the region, the EFB sought to empower regional actors and experts, notably by strengthening the BiEPAG, through advocacy activities, and aligning advocacy with capacity development activities through the Fellowship and T&L Programmes.

The EFB "went back to the basics", and worked to bolster and reaffirm real European interest and perspective across the region.

The EFB's network of policy-makers, experts, civil servants and civil society in the region allow it to be constantly aware of what is going on "on the ground", identifying gaps and opportunities for further work as they arise.

Civil society and the Berlin Process

The Berlin Process, initiated by Germany in 2014, was a response to the European Commission's announcement that the EU would welcome no new Member State before 2019. The initiative brings together a select group of Member States to continue working towards EU accession for Western Balkans countries.

On request by the Austrian government and the ERSTE Foundation in 2015, the EFB brought the voice of civil society organisations into the Berlin Process by organising a CSO forum during the Berlin Process summit in Austria. Since then, the EFB has coordinated civil society during summits in France and Italy.

Involving CSOs ensured regional politicians would recognise the importance of including diverse voices in the EU accession process.

By bringing civil society into the process, the EFB helped create civil society connections within the region and improved the fund's ability to gather civil society support for other areas of its work, including shaping policy recommendations.

The EFB's unique position allows it to be innovative and grasp opportunities. The Vicinities initiative is a good example of how the EFB has been able to take risks and innovate in a way that others could not. This unique position has also given the EFB access to an international network which opened opportunities for new work, for example in contributing to the Berlin Process.

Vicinities

The EFB set up the first current affairs regional TV talk-show in 2012, in cooperation with the Center for Democracy and Reconciliation in South East Europe (CDRSEE). Vicinities gathers experts, journalists and policy-makers to talk about challenging issues facing the region, including the brain drain, war crimes, economic crises and EU accession, in a classic journalistic model.

While other actors suggested that such a concept would never be successful given the complex environment of the Western Balkans, the show has broadcast six seasons, initially in five countries. It is now broadcast in eight countries across the region.

Importantly, all those involved in the show speak their own language, respecting political and cultural difference in order to bring people of the region together and enhance cross-border cooperation.

Above all, the show was aimed at gaining a quality viewership interested in the topics – not to reach as many people as possible. It sought to show people that their regional neighbours face the same struggles as their own.

While Vicinities has a political role, it also shows what standards of journalism should be at the very time these standards are eroding in the region and beyond. Vicinities brings journalism back to what it should be: to inform, to educate and to entertain.

"The EFB is unique. They believe in something and reach parts of civil society that others simply cannot" NENAD ŠEBEK, FORMER EXECUTIVE DIRECTOR OF THE CDRSEE

As a donor, grantees report that the EFB is easy to work with, giving them the liberty to introduce new work, and is constantly willing to learn. Based on feedback from grantees, the EFB constantly develops its programmes in terms of what focus it should take, how it could be more visible in specific contexts, and how it could have a bigger impact.

"The EFB has modest funds, but their action goes a long way. They do not shy away, they find inventive ways to produce impact. They consult intensely with other donors in the region, and that coordination has been very positive"

IVAN VEJVODA, FORMER EXECUTIVE DIRECTOR OF THE BALKAN TRUST FOR DEMOCRACY, THE GERMAN MARSHAL FUND OF THE UNITED STATES

6. KEY LESSONS

What lessons from the experience of the European Fund for the Balkans can be drawn for the benefit of funders interested in collaborative funds?

What's key to a successful pooled fund: create a strong and trusted core partnership from the beginning, make an investment of time and money, and ensure that those involved have a substantial understanding of the needs on the ground.



STARTING

- Have a solid base to guide your mission in the early days. It's vital to have authoritative data or a strong policy document which can inspire and orient efforts in a common direction.
- **Be frank with partners from the start**. When collaborating in a pooled fund, funders must be clear about their own interests, their strategy, what they can do, and how much they can contribute.
- **Create positive personal relationships between the main players**. In addressing challenging issues, it is essential that core funders find common ground, cultivating this positive relationship intentionally from the beginning.
- A long-term monetary investment. Social and political conditions will always change, and not just in the Western Balkans. Foundations need to have a long-term vision and the financial breadth to continue impactful work.

STEERING

- **Expertise and continuity are important**. Funders with prior experience are critical to a pooled fund's success. In addition, continuity within the partnership helps build the trust and understanding required.
- **Be open to new partnerships**. From an early stage, and in addition to enriching relationships among founding partners, it is also important to remain open to the possibility of growing the partnership to ensure long-term sustainability.
- **Review the work**. As time goes on, it is important to take a step back and look at the work done, the structures in place, and the pathways for decision-making to reflect on whether they all work as intended. In short, to hold the partnership accountable early and regularly.

STRATEGISING

- **Don't work from scratch**. It is important to look at what already exists before investing in a strategy. Grasping onto existing work helps to be more economical, relevant, and effective.
- Flexibility is key. A pooled fund must be able to adapt to changes in the field, be flexible, be unconventional, and seize new opportunities as they arise.
- Let the locals be heard. As foundations are in a position of power with their own interests, it can be easy to overlook the local voices. Instead, the work must seek to strengthen them.



Source: EFB



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