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Civic Space Report
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Civic Space Report Poland

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Civic Space Report 2025/2026

Poland

Country Score: **Enabling**

Country Trend: ↗

3.50



Cluster A: 3.60
A1 Equal treatment: 4
A2 Political recognition as partners: 3
A3 Refrained authorities from smearing: 4
A4 No weaponization of state powers: 4
A5 Transparent and open public institutions: 3



Cluster B: 3.80
B1 Free establishment and operation: 4
B2 CSOs enjoy a safe space: 4
B3 Liberty of resourcing: 4
B4 Enabling fiscal environment: 3
B5 Free expression of criticism: 4



Cluster C: 3.60
C1 Citizens trust: 3
C2 Present in media: 4
C3 Free engagement: 4
C4 CSOs embedded in communities: 3
C5 Freedom of assembly: 4



Cluster D: 3.00
D1 Decision-making participation: 3
D2 Timely consultations: 3
D3 Policies for cooperation: 3
D4 Free advocacy: 3
D5 Government listens: 3

Civic Space Report – Poland

Introduction

This report assesses the enabling environment for civil society organisations (CSOs) in Poland during 2025–2026. The reporting period follows the change of government in late 2023, which ended a period in which independent CSOs were often marginalised, stigmatised and pressured by public authorities. The assessment therefore describes an environment that is markedly more open than before, but one in which many reforms promised by the government remain unfinished. Each standard is described in terms of its legal framework, its application in practice and its material consequences for CSOs, followed by a trend assessment and a score. The scores are summarised in a table at the end of the narrative, followed by concluding remarks.



Cluster A – Institutional and Political Environment and Narratives of CSOs

How do political institutions interact with and portray CSOs?

A1 – Equal treatment

Standard. *The state treats all CSOs equally with regard to their establishment, registration and activities, and does not restrict organizations because they express views critical of officials or policy without privileging loyal or government-organized/funded entities (GONGOs).*

Poland's legal framework provides for equal treatment of CSOs. The Constitution guarantees freedom of association, while the rules governing the establishment, registration and operation of associations and foundations are generally applied without discrimination based on political views or advocacy activities.

The situation has improved markedly since the change of government in late 2023. Under the previous government, public institutions frequently favoured government-aligned organisations, including GONGOs, in the allocation of public funding, access to decision-makers and participation in consultative mechanisms. Independent and government-critical organisations reported discriminatory treatment and exclusion from public support. During 2025–2026, this pattern largely ceased. Public authorities generally abandoned the previous practice of privileging

politically loyal organisations, and there were no comparable reports of systematic discrimination against CSOs because of their criticism of government policies.

The change has contributed to a more level playing field for civil society. Individual controversies over grant decisions or cooperation with public authorities continue to occur, but they do not appear to constitute a systemic pattern of discrimination. The broader improvement is consistent with the V-Dem Democracy Report 2025 (Varieties of Democracy Institute, 2025), which identified Poland among the countries in which democratic decline was reversed and classified it among the democratizing countries, although the report's assessment was based on data through 2024.

Trend. Improving – the favouritism towards government-aligned organisations that marked the previous period has largely ceased.

Score 4 – Enabling: Equal treatment is broadly ensured in law and practice, with only isolated controversies and no systemic discrimination.

A2 – Political recognition as partners

> ***Standard.*** *Public institutions and officeholders recognize CSOs as legitimate, independent democratic actors and engage them as partners rather than adversaries.*

Following the 2023 parliamentary elections, Prime Minister D. Tusk repeatedly presented a strong and independent civil society as a cornerstone of liberal democracy and pledged to rebuild trust between the state and CSOs after years of confrontation. The new government created the office of the Minister for Civil Society and established thematic working groups bringing together public administration and NGOs to develop proposals for reform. It also established a Government Commission

for Investigating Repression against Civil Society under the previous administration. Its chair, S. Gregorczyk-Abram, was subsequently elected Commissioner for Human Rights.

Relations between public authorities and CSOs have consequently become more cooperative. Independent organisations are once again treated as legitimate interlocutors rather than political adversaries, and government rhetoric towards the sector has become markedly more respectful. The 2026 Civil Society Organizations Resilience Index (Pazderski, 2026) also points to growing recognition of the importance of CSOs by public institutions, while stressing the need to strengthen partnerships with local authorities, business and communities.

The change in political recognition has not, however, been matched by the full implementation of the government's earlier commitments. As F. Pazderski noted in 2026 (Pazderski, 2026), many of the pledges made before the 2023 elections—including reforms to civic dialogue, public consultations and the financing framework—remain unfulfilled. The dedicated ministerial position was also abolished in the 2025 government reshuffle. CSOs therefore have substantially greater political recognition than under the previous government, but this recognition is not yet fully embedded in durable institutional and legislative arrangements.

Trend. Improving – political recognition has grown markedly, but it is not yet embedded in durable institutional arrangements.

Score 3 – Mostly enabling: Recognition is substantially stronger than before, but unfulfilled pledges and the abolished ministerial post keep it from being fully secured.

A3 – Refrained authorities from smearing

> ***Standard.*** *Officials and state bodies refrain from stigmatizing, vilifying, or delegitimizing rhetoric and smear campaigns against CSOs (e.g., "foreign agents," "enemies"), including in state-supported media.*

Poland's legal framework does not provide a basis for public authorities to stigmatise or discriminate against CSOs because of their activities or sources of funding. International cooperation and foreign funding remain lawful.

The most significant change during 2025–2026 has been in official political rhetoric. Under the previous government, independent organisations, particularly those working on the rule of law, human rights, migration, women's rights and LGBTQI+ equality, were regularly portrayed by senior politicians and state-controlled media as politically biased, acting against the national interest or serving foreign agendas (Raport Komisji ds. represji..., 2025), and some abstained from advocacy being afraid of losing funds (Gumkowska, Charycka, Bednarek, 2022). This pattern has largely disappeared from government communication. The reform of public media also removed much of the sustained anti-CSO rhetoric that had characterised parts of public broadcasting.

Hostile rhetoric towards CSOs remains present in political debate, particularly among opposition politicians and in some partisan media. Organisations working on migration, LGBTQI+ rights, reproductive rights and other politically contentious issues continue to face criticism and online attacks. These attacks, however, are not promoted by state institutions and there have been no systematic attempts by the government to portray international cooperation by Polish CSOs as illegitimate foreign interference.

Trend. Improving significantly – smearing has largely disappeared from government communication, while hostile rhetoric persists in opposition politics and partisan media.

Score 4 – Enabling: State authorities no longer stigmatise CSOs, and the remaining hostile rhetoric is not promoted by state institutions.

A4 – No weaponization of state powers and good governance principles

> ***Standard.*** *The state does not deploy institutional powers — audits, inspections, tax, security or law-enforcement bodies, emergency measures, or principles such as transparency and fiscal due diligence — selectively or disproportionately to pressure CSOs because of their activities or views.*

Poland's legal framework provides safeguards against arbitrary state interference with CSOs, including constitutional guarantees of freedom of association and judicial review of administrative decisions. During 2025–2026, the government's approach to civil society differed substantially from that of the previous administration.

The most significant institutional development was the establishment in 2025 of the Commission for Investigating Mechanisms of Repression against Civil Society Organizations and Civic Activists in 2015–2023. Its work documented the use of legal and administrative instruments under the previous government to discourage civic activism and create a chilling effect. During the assessment period, there was no evidence that comparable practices were being systematically employed against organisations critical of public authorities.

The restructuring of the National Institute of Freedom[1] and changes to public funding mechanisms also reduced opportunities for politically motivated administrative interference. At the same time, institutional safeguards against future abuse remain incomplete. The Civil Society

Organizations Resilience Index (Pazderski, 2026) stresses the importance of stronger structural guarantees to prevent legal and administrative instruments from again being used to create uncertainty or pressure for CSOs.

Trend. Improving – past repressive practices have been documented and are no longer applied systematically, though safeguards against their return remain incomplete.

Score 4 – Enabling: No systematic weaponization of state powers was observed, but structural guarantees against future abuse are still lacking.

A5 – Transparent and open public institutions

> ***Standard.*** *Public institutions operate transparently and proactively provide access to information, enabling CSOs and citizens to scrutinize decisions and/or access to decision-making and hold authorities accountable.*

Poland has a well-established legal framework guaranteeing transparency of public administration. The Constitution guarantees the right to obtain information on the activities of public authorities, while the Act on Access to Public Information provides broad access to official documents and information held by public institutions. CSOs make extensive use of these provisions in advocacy, monitoring and litigation.

During 2025–2026, the framework remained stable and several developments strengthened institutional transparency. The implementation of the Central Register of Public Contracts improved access to information on government spending, while digital publication of information and interventions by the Commissioner for Human Rights supported transparency. Another definite point in the current administration's favor is its openness to holding public hearings for candidates to senior state positions. Thanks to the persistence of CSOs, hearings were held for,

among others, candidates for head of the Supreme Audit Office (NIK), the Office of Electronic Communications (UKE) and the state commission on AI. A meeting between CSOs and candidates for the Commissioner for Human Rights (RPO) was also organized.

In practice, however, access to information continues to fall short of the legal standard. Watchdog Poland's 2025 report (Sieć Obywatelska Watchdog Polska, 2025) found no systemic breakthrough, pointing to inconsistent application of access-to-information rules, lengthy proceedings and continued reliance on broad interpretations of concepts such as "processed information" to refuse disclosure. The organisation also identified shortcomings in legislative transparency, access to environmental information and rules governing the transparency of official social-media accounts. Poland has not ratified the Tromsø Convention and has not joined the Open Government Partnership (European Commission, 2025).

Trend. Stable, with some progress – legal guarantees are unchanged and new transparency measures have been introduced, but implementation problems persist.

Score 3 – Mostly enabling: A strong legal framework is undermined by inconsistent practice, lengthy proceedings and refusals to disclose information.



Cluster B – Legal and Financial Framework for CSOs

What formal conditions shape CSO operations and sustainability?

B1 – Free establishment and operation

> ***Standard.*** *Everyone can freely establish, join or participate in a CSO; CSOs determine their own objectives; registration is clear, simple, quick and inexpensive. The state does not interfere in internal governance, and monitoring or reporting is defined by law, proportionate and not onerous.*

Poland provides a strong legal basis for the establishment and operation of CSOs. Freedom of association is guaranteed by the Constitution and implemented primarily through the Law on Associations and the Foundations Act. Individuals are generally free to establish, join and participate in associations and foundations, define their objectives, determine their internal governance and cooperate with domestic and international partners. Foreign nationals residing in Poland may form and join associations under the same provisions as Polish citizens, while non-residents may join associations where their statutes permit it.

Registration procedures are generally accessible and inexpensive and are subject to judicial oversight. The state does not interfere in the internal governance of CSOs beyond supervisory mechanisms provided by law. The European Commission's 2025 Rule of Law Report (European Commission, 2025) noted further progress in improving the framework in which civil society operates.

Practical obstacles nevertheless remain. The Civic Space Report 2026 (European Civic Forum, 2026) identifies registration procedures, reporting obligations and other administrative requirements as a disproportionate burden for some smaller organisations. Routine supervision is generally conducted within the legal framework, but organisations continue to report bureaucratic complexity and inconsistent administrative practice. The report also identifies specific barriers affecting some groups: transgender people whose legal documents do not reflect their gender identity may be required to disclose personal data during registration, creating risks to privacy and exposing them to discrimination.

Trend. Stable, with some incremental improvements – the strong legal basis is unchanged, and the European Commission noted further progress in the framework for civil society.

Score 4 – Enabling: Establishment and operation are well protected in law and practice, and the remaining administrative burdens mainly affect smaller organisations and specific groups.

B2 – CSOs enjoy a safe space and protection from arbitrariness

> ***Standard.*** *CSOs are protected against arbitrary or politically motivated suspension, dissolution or sanction; such measures rest on clear legal grounds, proportionality and independent judicial review.*

The operating environment for CSOs improved significantly during 2025–2026. The Civic Space Report 2026 concludes that the systematic political pressure experienced by many organisations under the previous government substantially diminished. CSOs were no longer exposed to comparable politically motivated administrative measures or systematic misuse of public institutions aimed at restricting their activities. The European Commission likewise noted progress (European Commission, 2025) in the framework for civil society, including reforms to public funding mechanisms and renewed dialogue between public authorities and CSOs.

This improvement is also reflected in Freedom House's Freedom in the World 2026 (Freedom House, 2026), which rates Poland as "Free" with a score of 82/100. At the same time, Freedom House assigns Poland 3/4 for freedom of NGOs, noting that organisations generally operate freely but that restrictions affecting migration-related groups and humanitarian activists remain a concern.

Some proceedings initiated under the previous administration remained pending, and civil society experts continue to call for stronger institutional safeguards against future abuses. Organisations working on migration and humanitarian assistance also continue to face operational difficulties, although these arise primarily from the wider legal and political context rather than arbitrary interference with their legal status.

Trend. Improving significantly – systematic political pressure on CSOs has substantially diminished.

Score 4 – Enabling: CSOs generally operate freely and safely, with remaining difficulties limited to migration-related and humanitarian organisations and to unresolved legacy proceedings.

B3 – Liberty of resourcing

> ***Standard.*** *CSOs are free to seek, receive and use financial and material resources from domestic, foreign and international sources, public or private, with no distinction in treatment between foreign/international and domestic resources, and without stigmatization.*

Polish CSOs enjoy broad legal freedom to seek, receive and use financial resources from domestic, European and international sources, including foreign private donors. Receiving foreign funding does not entail additional registration or reporting requirements. CSOs participate extensively in EU programmes and cross-border partnerships and may generate income through economic activities within the limits established by law.

The political environment surrounding public funding has nevertheless changed significantly since 2023. The National Institute of Freedom was reformed, including the replacement of its previous leadership through an open recruitment process and the creation of a new council with greater representation of civil society. Funding procedures became more transparent and merit-based. These changes addressed concerns that, under the previous government, state resources had disproportionately benefited organisations aligned with the governing majority.

The principal remaining challenge is financial sustainability rather than formal access to resources. The Civil Society Organizations Resilience Index (Pazderski, 2026) finds that only around one quarter of Polish organisations have financial reserves sufficient to withstand periods of crisis. Many remain dependent on short-term public project funding, while philanthropy and income from economic activity remain relatively underdeveloped. Funding mechanisms provide limited support for institutional development and core operating costs, particularly affecting smaller organisations and those outside major urban centres.

Trend. Improving – public funding mechanisms have become more transparent and merit-based, while financial sustainability remains a challenge.

Score 4 – Enabling: Access to resources is legally unrestricted and fairer than before, although weak financial sustainability remains a persistent concern.

B4 – Enabling fiscal environment

Standard. *CSOs and their donors enjoy a favorable and stable tax environment that supports CSO resourcing and encourages philanthropy. Anti-money laundering and counter-terrorism measures, and sanction regimes, are applied to CSOs proportionately and on a risk basis.*

Polish CSOs operate within a generally favourable fiscal framework. They can benefit from the 1.5% personal income tax designation and exemptions from certain taxes for statutory activities. Individuals and businesses can claim tax deductions for charitable donations, while CSOs are generally exempt from corporate income tax on income used for statutory purposes. During 2025–2026, there were no indications that AML, CFT or sanctions regimes were systematically misused to restrict CSOs or their access to banking services.

The government nevertheless continued to address legal and administrative complexity affecting the sector. The Working Group on Legal Simplification for NGOs worked on reforms intended to modernise the legal and fiscal framework and reduce unnecessary administrative burdens. Proposals included clarification of the CIT exemption for CSOs, more flexible rules concerning own contributions to publicly funded projects and simplified reporting requirements for smaller organisations. Several of these reforms remained at the proposal stage during the assessment period.

The fiscal environment also remains insufficiently supportive of long-term financial sustainability. Existing tax incentives have not generated a strong culture of private philanthropy, while many organisations remain dependent on public project grants and lack stable institutional funding. CSOs and sector experts have called for broader measures supporting individual and corporate giving and simplifying tax rules applicable to CSOs (Schimanek, T., 2025).

Trend. Stable – the favourable framework is unchanged, and simplification reforms have so far remained at the proposal stage.

Score 3 – Mostly enabling: The fiscal framework is generally favourable, but pending reforms and weak incentives for private giving limit its enabling effect.

B5 – Free expressions of criticism

> ***Standard.*** *CSOs, activists and journalists can express opinions and criticism freely, online and offline, and are protected from SLAPPs, legal intimidation and disproportionate sanctions.*

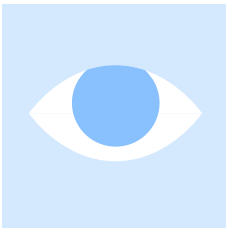
The Constitution guarantees freedom of expression, including the right of CSOs, activists and journalists to criticise public authorities and participate in public debate. During 2025–2026, organisations remained free to conduct campaigns, publish reports, participate in demonstrations and cooperate with domestic and international media.

The Civic Space Report 2026 (European Civic Forum, 2026) notes that the hostile climate experienced by many organisations under the previous government diminished considerably. Public debate remains highly polarised, however, and organisations working on migration, women's rights and LGBTQI+ equality continue to face criticism from political actors and online harassment. Such attacks no longer form part of a systematic government strategy to delegitimise civil society. Freedom House's Freedom in the World 2026 (Freedom House, 2026) similarly assesses freedom of expression in Poland at 3/4 and media freedom at 3/4, indicating that the improvement has not removed all structural problems affecting the wider environment for public criticism and independent media.

An important legal development was the adoption of legislation implementing the EU Anti-SLAPP Directive. The new framework introduces procedural safeguards against manifestly unfounded lawsuits intended to silence public participation.

Trend. Improving – the hostile climate of the previous period has diminished considerably, and new anti-SLAPP safeguards have been introduced.

Score 4 – Enabling: Freedom to criticise is protected and no longer subject to systematic state pressure, despite polarisation and online harassment.



Cluster C – Public Engagement and Perceptions towards the Work of CSOs

How are CSOs perceived, and how do citizens engage with them?

C1 – Citizens' trust

> ***Standard.*** *Citizens broadly trust CSOs and regard them as legitimate, valuable contributors to public life.*

CSOs are generally recognised in Poland as legitimate contributors to public life. Their role during successive crises, including the humanitarian response following Russia's full-scale invasion of Ukraine and responses to natural disasters, has strengthened recognition of their social importance.

The Civil Society Organizations Resilience Index identifies social trust and public recognition as one of the weaker dimensions of Polish civil society's resilience (Pazderski, 2026). Many organisations enjoy strong legitimacy within the communities and groups they serve, but the sector as a whole continues to face limited public visibility, relatively weak engagement with citizens and political polarisation. The report identifies stronger communication, greater transparency and longer-term relationships with communities as important for building public confidence.

Trend. Stable – CSOs are broadly recognised as legitimate, but public trust continues to be uneven.

Score 3 – Mostly enabling: CSOs enjoy legitimacy, but limited public visibility and weak engagement with citizens hold trust back.

C2 – Pluralistic presentation in media

> ***Standard.*** *CSOs are represented in the media fairly and pluralistically, with access to diverse, independent outlets that report on their work without systemic bias.*

CSOs have broad access to a diverse media environment, including independent national, regional and local outlets as well as specialised civic and non-profit media. During 2025–2026, organisations continued to participate in public debate through traditional media, online platforms and social media without legal or administrative restrictions.

The environment for media representation improved following the change of government. The Civic Space Report 2026 (European Civic Forum, 2026) notes that systematic delegitimisation of independent CSOs in public discourse has largely ceased. The reform of public media ended the sustained anti-CSO narratives that had characterised parts of public broadcasting under the previous government, allowing civil society actors to regain visibility in mainstream debate.

Media pluralism remains affected by broader political polarisation. Issues such as migration, LGBTQI+ rights and reproductive rights continue to generate strongly polarised coverage, particularly in partisan media. CSOs active in these areas remain targets of criticism from some commentators and opposition-aligned outlets. These attacks reflect continuing political and editorial polarisation rather than coordinated state efforts to marginalise independent CSOs.

Trend. Improving – systematic delegitimisation of CSOs in public media has largely ceased, although polarised coverage persists in partisan outlets.

Score 4 – Enabling: CSOs have broad access to a diverse media environment, and the remaining negative coverage reflects political polarisation rather than state action.

C3 – Free engagement

Standard. *Citizens can engage freely and safely in civic activities — volunteering, activism, donating, protest — and such participation is socially accepted and not penalized.*

Citizens in Poland are free to engage in civic activities, including volunteering, charitable giving, public advocacy, peaceful protest and participation in CSOs. The legal framework protects freedom of association, assembly and expression, and there were no legislative measures during 2025–2026 restricting citizens' ability to participate in civic life or support CSOs.

Civic participation nevertheless continues to be affected by political and social polarisation. Individuals active on migration, women's rights and LGBTQI+ equality may encounter hostile public debate, online harassment or criticism from political actors and partisan media. These pressures do not amount to systematic restrictions imposed by public authorities and have not prevented citizens from participating freely in civic activities.

Trend. Stable – there were no restrictive measures on civic participation, and polarisation remains the main pressure.

Score 4 – Enabling: Citizens engage freely, and pressures on those active on contentious issues do not amount to restrictions imposed by public authorities.

C4 – CSOs embedded in communities

Standard. *CSOs are embedded in their communities and able to mobilize grassroots support, public solidarity and cross-sector backing in defense of civic space.*

CSOs remain deeply involved in addressing local social needs and continue to mobilise volunteers and grassroots support through community-based activities. Their role during the humanitarian response to Russia's invasion of Ukraine and in responses to natural disasters demonstrated their capacity to mobilise citizens, volunteers and local communities (Mikołajczak, P., 2025). Cooperation between NGOs, local governments, businesses and informal civic initiatives remains an important feature of Poland's civic landscape.

Conditions for cooperation with public institutions improved during 2025–2026 as political pressure on civil society diminished and dialogue with public authorities was restored. At the same time, the Civil Society Organizations Resilience Index (Pazderski, 2026) identifies community embeddedness and social connectedness as among the weaker dimensions of Polish civil society. Many CSOs rely on narrow groups of supporters, have limited long-term relationships with local communities and businesses, and remain insufficiently integrated into broader cross-sector networks. The report therefore stresses the importance of strengthening local partnerships and volunteer engagement and improving communication with citizens.

Trend. Stable overall – conditions for cooperation with public institutions have improved, but community embeddedness remains one of the weaker dimensions.

Score 3 – Mostly enabling: CSOs demonstrate strong mobilisation capacity, but narrow support bases and limited long-term links with communities restrain their embeddedness.

C5 – Freedom of assembly

> ***Standard.*** *Everyone can freely enjoy the right to freedom of peaceful assembly, organizing and participating in assemblies (including online), without unwarranted interference.*

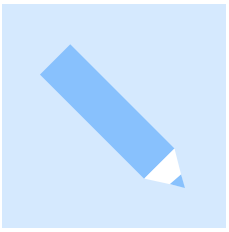
The right to freedom of peaceful assembly is guaranteed by the Constitution and protected by the Law on Assemblies. During 2025–2026, individuals and CSOs were able to organise and participate in demonstrations, protests and public gatherings without undue legal or administrative restrictions. Organisations continued to mobilise publicly around issues including the rule of law, migration, women's rights, environmental protection and European integration. Large-scale demonstrations took place throughout the period without evidence of systematic interference by public authorities.

The overall environment for exercising freedom of assembly improved following the change of government. The Civic Space Report 2026 (European Civic Forum, 2026) describes Polish civic space as significantly more open than under the previous government, while CIVICUS (CIVICUS, 2026) upgraded Poland's civic-space rating from "Obstructed" to "Narrowed" in recognition of progress in civic freedoms. Freedom House's Freedom in the World 2026 (Freedom House, 2026) also rates freedom of assembly at 3/4, confirming that the right is generally respected while indicating that some restrictions and concerns remain.

Some structural concerns remain. CSOs continue to advocate amendments to the Law on Assemblies, particularly provisions concerning so-called cyclical assemblies, which have long been criticised for granting preferential treatment to certain recurring demonstrations.

Trend. Improving – civic space has become significantly more open, as reflected in the upgraded CIVICUS rating.

Score 4 – Enabling: The right of assembly is generally respected in practice, with the remaining concerns limited to specific provisions of the Law on Assemblies.



Cluster D – CSOs as Policy Makers

To what extent do CSOs influence and shape public policy?

D1 – Right to participate in decision-making including in the policy cycle

> ***Standard.*** *Everyone has the right to participate in decision-making, and authorities use mechanisms ensuring meaningful public and CSO participation, with redress for non-compliance, across the whole policy cycle and without discrimination.*

Poland provides a solid legal basis for CSO participation in public decision-making. Freedom of association and participation in public affairs are constitutionally protected, while reforms adopted under the EU Recovery and Resilience Facility strengthened consultation requirements in the Council of Ministers and the Sejm. Since late 2024, a dedicated parliamentary consultation platform has made legislative proposals and consultations more accessible. The European Commission's 2025 Rule of Law Report (European Commission, 2025) noted strengthened consultation rules and further progress in improving the framework for civil society.

During 2025–2026, CSOs participated in policy development through parliamentary committees, ministerial working groups, advisory bodies and public consultations, and continued to engage in European and international advocacy without retaliation. The institutional framework therefore provides multiple channels through which organisations can participate in the policy cycle.

The effectiveness of participation remains uneven, particularly beyond the initial stage of policy development. CSOs report significant differences between ministries and policy areas in their opportunities to influence implementation and monitoring. Access to public information also remains an obstacle to effective participation, as noted repeatedly by Watchdog Poland (Sieć Obywatelska Watchdog Polska, 2025).

Trend. Improving, mainly thanks to procedural and institutional reforms.

Score 3 – Mostly enabling: Multiple channels of participation exist, but the influence of CSOs is uneven beyond the initial stage of policy development.

D2 – Timely consultations and equal participation

> ***Standard.*** *Consultations are launched early, allow adequate time, and supply the information needed for substantive input. Participation is adequately resourced and accessible, so that grassroots and under-resourced CSOs are not excluded due to limited means.*

The legal framework for public consultation improved during the assessment period. Amendments to the Rules of Procedure of the Council of Ministers and the Sejm strengthened consultation requirements and limited the possibility of adopting legislation without prior consultation, subject to defined exceptions. Digital consultation tools have also improved access to legislative processes.

In practice, however, consultations remain inconsistent. Civil society monitoring (Batory Foundation, 2025) shows that some draft legislation continues to bypass public consultation, while other consultations are launched late, provide insufficient time for substantive input or fail to provide stakeholders with the information needed to participate effectively.

Smaller and regional CSOs face additional constraints because they often lack the resources to engage in multiple parallel consultations, and there is no comprehensive mechanism to support their participation.

The government's migration policy provides a particularly clear example of the gap between formal consultation and meaningful participation. CSOs criticised the 2025–2030 Migration Strategy and subsequent asylum legislation for being prepared without meaningful consultation with organisations working on migration, refugee protection and human rights. Public hearings took place only after key policy decisions had already been taken, leading organisations to describe the process as tokenistic. Similar concerns were raised about consultations concerning the Civil Protection Programme (NGO.pl, 2026; OFOP, 2025; OKO.press, 2024).

Trend. Mixed – the legal framework for consultation has improved, while practice remains inconsistent.

Score 3 – Mostly enabling: Stronger rules and digital tools are undermined by late, bypassed or tokenistic consultations, particularly on migration.

D3 – Policies encourage cooperation with CSOs

> ***Standard.*** *State policies actively facilitate cooperation with CSOs: there is a strategy/policy on cooperation, and transparent consultative bodies that genuinely feed into decision-making.*

The current government entered office with commitments to rebuild civic dialogue, strengthen public participation and improve cooperation with CSOs. The institutional framework for dialogue consequently improved: CSOs are represented in advisory bodies and participate in discussions on legislative and policy reforms, including through the Committee

for Public Benefit. The government also established thematic working groups to develop proposals concerning civil dialogue, volunteering and legal simplification.

The institutional expansion has not consistently translated into policy influence. As noted by F. Pazderski (Pazderski, 2025) and other sector representatives, many recommendations developed by government working groups have not resulted in legislative or policy changes. The 2025 government reshuffle also abolished the dedicated Minister for Civil Society position, raising questions about the long-term political priority attached to the sector. CSOs therefore have more institutional opportunities for dialogue than under the previous government, but the influence of these mechanisms on final decisions remains limited.

Trend. Stable – institutional channels for dialogue have expanded, but their impact on policy outcomes remains limited.

Score 3 – Mostly enabling: More institutional opportunities exist than before, but the influence of these mechanisms on final decisions is limited.

D4 – Free advocacy and watchdogging

> ***Standard.*** *CSOs can freely conduct advocacy, watchdog and campaigning activities to influence policy and opinion, without these being restricted, taxed or reclassified as prohibited "political" activity.*

Polish CSOs enjoy broad legal freedom to engage in advocacy, public campaigning, strategic litigation and watchdog activities. The environment for such work improved significantly following the change of government. The Civic Space Report 2026 (European Civic Forum, 2026) notes that independent organisations no longer face the systematic hostility from public authorities experienced under the previous administration. Watchdog organisations, human rights groups and public-interest

organisations continued to publish reports, monitor public institutions, conduct strategic litigation and advocate for reforms without evidence of systematic state retaliation.

Access to public information remains an important constraint on effective watchdog activity. In 2024, the European Court of Human Rights ruled in *Sieć Obywatelska Watchdog Polska vs. Poland* that refusal to disclose the Constitutional Tribunal President's meeting calendar violated Article 10 of the ECHR. One year after the judgment, Watchdog Poland (Sieć Obywatelska Watchdog Polska, 2025) noted that, although the ruling affirmed the role of watchdog organisations, broader systemic problems in the implementation of the Access to Public Information Act remained unresolved. Its 2025 transparency report similarly identified inconsistent administrative practice and prolonged proceedings as continuing obstacles to effective civic oversight.

Trend. Improving – the environment for advocacy has become considerably more open, although access to public information remains a constraint.

Score 3 – Mostly enabling: Advocacy and watchdog work are free from state retaliation, but persistent access-to-information problems limit their effectiveness.

D5 – Government listens

> ***Standard.*** *Public authorities give CSO and public input genuine consideration and provide reasoned, traceable feedback on how contributions affected the final decision.*

Poland has a formal framework intended to ensure that public consultations result in reasoned consideration of civil society input. Under the Rules of Procedure of the Council of Ministers, ministries conducting public consultations are required to prepare a consultation

report explaining which comments were received, whether they were accepted or rejected and the reasons for the decisions. Government consultation guidelines further emphasise openness, responsiveness and accountability.

There are examples of this mechanism working as intended. The consultation report for the Strategy for Poland's Development 2030+, for example, presents responses to individual comments and identifies changes introduced as a result of stakeholder input. Similar approaches have been used in consultations conducted by the National Institute of Freedom, enabling participating organisations to identify how their recommendations were treated.

Independent monitoring nevertheless indicates substantial variation in practice. The Citizens' Legislation Forum (Schimanek, T., 2025) has identified differences in the quality and structure of consultation reports, including the absence of a uniform methodology for responding to comments, limited use of reconciliation meetings with stakeholders and, in some cases, cursory or insufficient explanations for rejecting proposals. More fundamentally, the feedback mechanism cannot provide meaningful influence where consultations are launched too late or after key political decisions have already been taken. The problems identified in the consultation of the migration strategy and in other high-profile legislative processes therefore concern not only whether authorities formally respond to comments, but whether CSO input reaches decision-makers while there is still an opportunity to affect the outcome.

Trend. Stable – the formal mechanisms for feedback are in place, but their application varies considerably.

Score 3 – Mostly enabling: Formal responsiveness mechanisms exist and work in some cases, but inconsistent practice and late consultations limit real influence.

Conclusion

The most important feature of the Polish picture in 2025–2026 is the shift from confrontation to cooperation. Poland's legal framework for civil society was never dismantled, and the main change has been in the way public authorities behave: stigmatising rhetoric has largely disappeared from government communication, favouritism towards loyal organisations has ceased, politically motivated administrative pressure has diminished, and the funding system has become more transparent. This is reflected in the highest scores for the standards concerning smearing, the safe space for CSOs, free expression of criticism and freedom of assembly, and in external assessments such as the upgraded CIVICUS rating. The composite result of 3.5 places Poland between mostly enabling and enabling.

At the same time, the findings show that the improvement rests more on political will than on lasting institutional guarantees. The scores are lowest where the environment depends on the quality of day-to-day implementation: access to public information, the effectiveness of consultations, the influence of CSOs on final decisions and the fiscal and financial sustainability of the sector. Many pledges made before the 2023 elections, including reforms of civic dialogue, consultations and financing, remain unfulfilled, the dedicated ministerial post has been abolished, and the migration policy shows that formal consultation may still fall short of meaningful participation. Hostile narratives have not disappeared but have moved to opposition politics and partisan media, and organisations working on migration, LGBTQI+ and reproductive rights remain most exposed.

For future monitoring, the key question is whether the current gains will be consolidated in legislation and durable institutions, and whether they will withstand political change. Particular attention should be paid to the adoption of the pending legal simplification and fiscal reforms, the implementation of the access-to-information framework, the quality and

timing of consultations on politically sensitive issues, the situation of organisations working with migrants and other contested groups, and the financial resilience of smaller and local CSOs.

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Endnotes

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