

# Country Focus Report

**Bhutan**

**July 2025**

## A) Introduction to the Enabling Environment

What we understand by an Enabling Environment is the combination of laws, rules and social attitudes that support and promote the work of civil society. Within such an environment, civil society can engage in political and public life without fear of reprisals, openly express its views, and actively participate in shaping its context. This includes a supportive legal and regulatory framework for civil society, ensuring access to information and resources that are sustainable and flexible to pursue their goals unhindered, in safe physical and digital spaces. In an enabling environment, the state demonstrates openness and responsiveness in governance, promoting transparency, accountability, and inclusive decision-making. Positive values, norms, attitudes, and practices towards civil society from state and non-state actors further underscore the supportive environment.

To capture the state of the Enabling Environment, we use the following six principles:

Six key enabling principles:

1. Respect and protection of fundamental freedoms
2. Supportive legal and regulatory framework
3. Accessible and sustainable resources
4. Open and responsive State
5. Supportive public culture and discourses on civil society
6. Access to a secure digital environment

In this Country Focus Report, each enabling principle is assessed with a quantitative score and complemented by an analysis and recommendations written by our Network Members. Rather than offering a singular index to rank countries, the report aims to measure the enabling environment for civil society across the 6 principles, discerning dimensions of strength and those requiring attention.

The findings presented in this report are grounded in the insights and diverse perspectives of civil society actors who came together in a dedicated panel with representatives from civil society to discuss and evaluate the state of the Enabling Environment. Their collective input enriches the report with a grounded, participatory assessment. This primary input is further supported by secondary sources of information, which provide additional context and strengthen the analysis.

### Brief overview of the country context

Bhutan transitioned to a Democratic Constitutional Monarchy in 2008. Since then, the country has held four parliamentary elections, the [most recent one being in 2024](#), which brought the People's Democratic Party (PDP) back into power. The elections have seen peaceful transitions of power from incumbent governments to opposition or new parties, with no reported electoral violence. A written [constitution](#) was adopted in 2008 as part of transitioning into a democracy. Article 7 of the constitution guarantees the protection of civic freedoms such as freedom of association, expression, and assembly.

A precursor to the transition was the passing of the [Civil Society Organizations Act](#) in 2007, the umbrella legal framework for the formation, registration, and operation of Civil Society Organisations (CSOs) in the country. Today, there are more than 50 formal CSOs, and many community-based organisations, informal groups, and associations in the country. CSOs are engaged in topics of poverty reduction, empowerment of vulnerable groups, environment

conservation, targeted health services, governance, and culture. [Public awareness](#) of the work of CSOs has increased and there is a growing frequency of genuine consultations with CSOs by the State on national policies and international commitments related to [women](#), [Persons with Disabilities](#), and the Universal Periodic Report ([UPR national Report](#)), and expressed intentions to collaborate (e.g. [Parliament-CSO Collaboration strategy](#); draft guideline for Government-CSO collaboration). Their role in the country, however, is limited by a still evolving democratic culture and a highly cautious approach towards civil society development which finds expression in, for example, recent administrative and financial requirements placed on CSOs. On their part, CSOs are limited by inadequate capacities, lack of coordinated strategic engagement within the sector itself and with the state, inadequate platforms for collective voice, and a critical shortage of diverse, sustainable resources.

At the global level, Bhutan's democratic performance [shows stable, mid-range](#) performance and has moved from 'partly free' to 'free' on the [Freedom House index](#). The number and diversity of media has grown; however, the media in general is faced with sustainability issues, challenges in accessing timely information, high attrition rate, and self-censorship, which resulted in the country falling from 147<sup>th</sup> to 150<sup>th</sup> place on the [World Press Freedom Index](#). The country has ratified three international human rights treaties and two optional protocols. There are [calls to ratify](#) other core international human rights treaties, including the International Covenant on Civil and Political Rights.

## B) Assessment of the Enabling Environment

### Principle 1: Respect and protection of fundamental freedoms

#### Score: 3<sup>1</sup> (Obstructed)

An enabling environment for civil society is contingent upon the effective protection of three core freedoms: association, peaceful assembly, and expression. While Bhutan's legal framework formally recognises these rights in article 7 of the Constitution, their practical application reveals restrictive interpretation and enforcement, which undermines the operational space for civil society actors.

#### 1.1 | Freedom of Association

Within the legal framework provided by the Constitution and the [CSO Act](#) of Bhutan, individuals have the right to form or join civil society organisations. In addition, various other policies enable the formation and registration of farmers' groups, cooperatives, and associations. Within communities, there are informal groups and associations formed to take collective action, largely focused on bettering the livelihood of members, networking, and offering support during times of need. Although the legal framework of Bhutan provides a legal basis for individuals to form or join civil society organisations, the mandatory registration process imposes cumbersome administrative and personal disclosure requirements. These include citizenship, income and asset declarations, and criminal records (Article 25, of the CSO Act), which may deter participation and limit inclusivity. Moreover, the discretionary power granted to authorities to deny or cancel registration based on broad criteria (e.g., contravention of laws or inactivity) introduces legal uncertainty. In addition, the [National Security Act of 1992](#) prohibits membership in associations that are deemed to be harmful to the peace and unity of the country.

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<sup>1</sup>This is a rebased score derived from the CIVICUS Monitor rating published in December 2024. The country is rated as Obstructed in the Monitor, with a score of 50/100, which has been converted to fit our 1–5 scale.

The [dissolution](#) of the Bhutan Civil Society Network and the [imposition](#) of financial sustainability requirements (e.g., setting up endowment funds) have been [flagged](#) internationally as regressive measures that constrain the autonomy and viability of CSOs. These developments suggest a shrinking civic space, where formal recognition is conditional and subject to increasing requirements.

## 1.2 | Freedom of Peaceful Assembly

While the Constitution guarantees the right to peaceful assembly, its implementation is qualified by the [National Security Act of 1992](#). The requirement for prior permission for public assembly, restrictions on assembly locations such as government buildings or military installations, or by declaring curfew, and the broad authority to disperse gatherings deemed unlawful or disruptive, collectively limit spontaneous or dissenting public expression. These provisions are to prevent breaches of peace but may risk being applied in a disproportionate or politically motivated manner.

## 1.3 | Freedom of Expression

The legal environment permits expression and advocacy, but practical constraints exist. The [Penal Code's](#) provisions on incitement, defamation, and public disorder—though intended to preserve harmony—may contribute to self-censorship, particularly among CSOs engaging in policy critique. There are growing instances of CSOs [advocating on specific thematic topics](#) or calling for changes to the general legislative environment (e.g. on the Civil Society Act 2007) and some few CSOs have introduced social accountability mechanisms to exact accountability from local government officials.

Journalistic freedom is [constrained](#). Although physical threats are rare, access to information remains a [challenge](#), with bureaucratic red tape and centralised communication protocols impeding transparency. The fragility of media institutions, marked by high attrition and financial instability, further weakens the ecosystem for independent reporting.

Despite formal guarantees, the operational reality for civic actors in Bhutan reflects a challenging environment. Administrative burdens, and discretionary enforcement mechanisms may collectively undermine the full realisation of civic freedoms. The country's "[obstructed](#)" rating on the CIVICUS Monitor is consistent with these findings, highlighting the need for legal reform, institutional safeguards, and greater transparency to foster a genuinely enabling environment for civil society.

# Principle 2: Supportive legal and regulatory framework

## Score: 3

### 2.1 | Registration

The legal framework in Bhutan provides a formal pathway for CSO registration through the [CSO Act](#) and the [CSO Rules and Regulations](#). Since the passing of the Act, there were robust developments in the numbers and diversity of CSOs. However, while the law is clear, its implementation presents practical and procedural barriers that disproportionately affect smaller CSOs. The requirement for citizenship, extensive documentation (15 documents), and multiple in-person visits to the CSO Authority create a high entry threshold. Although the registration fee (Nu. 3000) is relatively affordable, the administrative burden and slow decision-making process discourage new registrations—evidenced by the [absence of new CSOs registered](#) since December 2023.

The requirement for endowment and operational reserves further limits access for under-resourced CSOs, potentially reinforcing inequality in civic participation. The annual registration certificate renewal requirement, with penalties for late submission and risk of cancellation, adds to the compliance pressure. On 6 January 2025, a CSO [voluntarily dissolved](#), bringing the number of CSOs who chose to dissolve to three since 2022. Reasons for their voluntary dissolution are not clear, and could be attributed to a combination of financial sustainability challenges and growing administrative requirements. In addition, two CSOs have not renewed their certificate of registration, including a CSO that works in the area of protecting the rights of highly vulnerable children, and youth in conflict with the law.

For community-based groups, the process of certification is simple and can be done at the local government level. There are various legal frameworks depending on the mandate of the groups (e.g. farmers' groups and cooperatives operate within the [Cooperatives Act of Bhutan](#), community forestry management groups under the [Forest and Nature Conservation Rules and Regulations](#), and women or youth groups based on certificates received from local government administration). These frameworks are seen to provide adequate protection, in addition to constitutional rights to civic freedoms extended to all citizens by the constitution.

There is no clear or transparent appeal mechanism for denied registrations, and the lack of public information on such processes suggests limited accountability and redress. While community-based groups benefit from simpler certification processes at the local level, the national registration system remains bureaucratically intensive in practice.

## 2.2 | Operational Environment

The CSO Act of Bhutan (as amended in 2022) provides a legal framework that grants CSOs the autonomy to define their internal governance, objectives, and activities (Article 43). CSOs are permitted to engage in lawful undertakings, enter into contracts, and receive funding from domestic and international sources, subject to compliance with applicable laws. These provisions reflect a formally enabling operational environment. However, the Act also imposes significant administrative and procedural obligations. Article 44 outlines extensive documentation requirements, including a three-year programme of activities, annual work plans, a code of ethics, and declarations of compliance. These are prerequisites for registration and must be updated annually for renewal. The uniform application of these requirements, regardless of organizational size or capacity, creates a disproportionate burden on smaller CSOs, potentially diverting resources from programmatic work to compliance.

Additionally, Section 61 of the CSO Act requires CSOs to seek prior approval from the CSO Authority before employing any non-Bhutanese individuals, whether as paid staff or volunteers. While this is framed as a compliance measure with immigration and labour laws, it introduces a layer of bureaucratic control that may limit CSOs' ability to access specialised skills or international expertise. Articles 48–50 of the same law requires foreign CSOs to have a government agency partner and a detailed three-year plan to obtain accreditation. While these requirements aim to align foreign CSO activities with national priorities, they also function as gatekeeping mechanisms that may limit operational independence. In practice, while the legal framework allows for operational autonomy, it is tempered by procedural requirements and compliance expectations. The absence of differentiated reporting thresholds or simplified procedures for smaller or grassroots CSOs reinforces a one-size-fits-all regulatory approach, which may inhibit innovation, responsiveness, and sustainability within the sector.

On financial sustainability, the Act does not impose direct restrictions on funding sources, but the requirement to maintain endowment and operational reserves, enforced through

regulatory practice, functions as a structural barrier, especially for new or grassroots organisations. However, the Act does provide certain financial relief: registered CSOs are exempt from income tax on investment gains (Section 38), and Public Benefit Organisations (PBOs) may be granted exemptions from customs duties and other taxes on a case-by-case basis (Section 39). Mutual Benefit Organisations (MBOs), however, are not automatically entitled to these exemptions (Section 40). In addition, the absence of broader enabling provisions—such as simplified grant procedures, or tiered compliance frameworks—limits the ability of CSOs to diversify funding sources and scale operations.

Sections 71 and 72 of the CSO Act introduce restrictions on public fundraising, requiring CSOs to obtain a public collections certificate from the CSO Authority before conducting collections in public places or door-to-door. While intended to ensure accountability, these provisions may limit spontaneous or community-driven fundraising efforts, particularly for smaller organisations without the capacity to navigate formal certification processes. Section 73 further requires CSOs to seek permission from the Authority before altering their stated purpose.

### 2.3 | Protection from Interference

The CSO Act of Bhutan outlines procedures for registration, cancellation, and oversight of civil society organisations, but it does not contain a dedicated clause that explicitly protects CSOs from state interference. Instead, the legal framework relies on procedural conditions that, while intended to ensure accountability, may also expose CSOs to discretionary control. The dissolution of the Bhutan Civil Society Network through a written formal letter, raises concerns about the practical enforceability of legal protections. On their part, CSOs did not seek recourse in legal enforcement either. Instead, CSOs sought to fill the vacuum created by the absence of a network by strengthening thematic alliances through [quarterly meetings and Summits](#), and other [platforms](#). Notably, CSOs working on the thematic area of protecting the rights of Persons with Disabilities were active in providing policy feedback and in collaborating with government and UN agencies. Possibly as a repercussion of the dissolution of the network and a cultural context of regard for authority, there are plans to seek the endorsement of the CSO Authority for a guideline drafted by CSOs for quarterly meetings among themselves. Views on this are divided, with some CSOs expressing support for seeking the Authority's buy-in and endorsement while others voiced that it could entrench State involvement in CSO networking. Although there is no evidence of systematic inspections or surveillance, the absence of clear legal limits on state oversight leaves room for discretionary interference.

Section 32 of the CSO Act allows for the cancellation of a CSO's registration if it has ceased to carry out its stated purposes for a period of at least two years. Similarly, Section 33 permits cancellation if a CSO uses its funds or property for purposes not aligned with its registered objectives. While these provisions aim to uphold organisational integrity, they also create broad grounds for deregistration, particularly where operational delays or strategic shifts may be misinterpreted as inactivity or deviation. Section 41 of the Act further grants the Authority the power to refuse registration based on subjective criteria, such as whether a CSO's name is "offensive to good morals or national symbols" or if its objectives are deemed contrary to national laws. These vague and potentially broadly interpreted standards increase the risk of arbitrary denial of registration, particularly for organisations working on sensitive or rights-based issues.

The Act does not explicitly provide for independent appeal mechanisms or judicial review and oversight in cases of deregistration or dissolution, leaving CSOs vulnerable to discretionary decisions by the Authority. CSOs may take legal recourse under other laws such as the [Civil](#)



[and Criminal Procedure Code of Bhutan, 2001](#), Chapter 1, which applies the concept of equal protection for all individuals and prevents discriminatory practices although the CSO Act as the dedicated law governing CSOs should preferably have these provisions. Although Section 37 requires the CSO Authority to provide three months' written notice before cancellation and allows the organisation to respond, this does not constitute a formal appeal mechanism.

Overall, while the CSO Act provides procedural steps for registration and cancellation, it lacks explicit legal protections against undue interference. The combination of broad regulatory powers, the absence of appeal mechanisms, and discretionary authority and oversight powers creates a vulnerable operating environment where state interference—whether direct or indirect—remains a credible risk for CSOs, particularly those engaged in advocacy or working with marginalised communities. Strengthening legal safeguards—such as independent oversight, clearer definitions of non-compliance, clearer limits on administrative discretion, and guaranteed rights to appeal—would be essential to ensure genuine protection from interference.

## Principle 3: Accessible and Sustainable Resources

Score: 3.25

### 3.1 | Accessibility of Resources

CSOs in Bhutan operate in a resource environment that is partially enabling but constrained by structural and regulatory limitations. Funding is largely from international donors and foundations and therefore a cause for concern for the overall sustainability of CSOs. While there are no explicit legal restrictions on receiving domestic or international funding, the CSO Act imposes procedural requirements that could influence the emergence and continuity of smaller CSOs. For instance, the requirement to maintain endowment and operational reserves, enforced through regulatory practice, poses a significant barrier—particularly for smaller or newly established CSOs. This structural constraint is compounded by the phasing out of traditional international donors, raising concerns about long-term sustainability.

Access to funding is further shaped by public social and thematic preferences. [Charitable and spiritual causes](#) tend to attract more local support, while those focused on policy advocacy or civic engagement face greater difficulty mobilising resources. Although the CSO Authority has taken a positive step by allowing CSOs to operate [social enterprises](#), this remains a nascent opportunity requiring further capacity development.

Fundraising in public spaces or through door-to-door campaigns is regulated under Sections 71 and 72 of the CSO Act, which require CSOs to obtain a public collections certificate from the CSO Authority. While intended to ensure accountability, these provisions may limit spontaneous or community-driven fundraising, especially for smaller CSOs or those operating in remote areas. The need for prior approval introduces a layer of bureaucratic control that may discourage grassroots initiatives or delay urgent fundraising efforts.

In terms of fiscal policy, the Act provides some tax relief. Section 38 exempts CSOs from income tax on investment gains, and Section 39 allows PBOs to apply for exemptions from customs duties and other taxes on a case-by-case basis. However, MBOs are excluded from these exemptions unless specifically granted under Section 40. However, all donations to CSOs are tax deductible up to 5% of total gross income, with deductions integrated within the [income tax formats](#) of the Department of Revenue and Customs. Ease of making donations have been improved through apps on mobile phones that serves as evidence during tax filing.

Access to information about funding opportunities is uneven. While some CSOs have the capacity to respond to calls for proposals, many lack the technical skills or institutional

infrastructure to compete effectively. Proposal formats are often complex and not always aligned with local capacities, highlighting the need for capacity-building support and simplified application processes. Banking services are generally accessible, and there are no reported restrictions or surveillance concerns affecting CSOs' financial transactions. However, the requirement for full financial disclosure, including sources of funding and annual audited reports, while promoting transparency, may deter some donors concerned about confidentiality or administrative burden.

Overall, while the legal framework does not overtly restrict access to resources, regulatory requirements, limited fiscal incentives, and procedural barriers to fundraising constrain the ability of CSOs to secure sustainable and diversified funding.

### **3.2 | Effectiveness of Resources**

The effectiveness of donor funding for CSOs in Bhutan varies significantly across organisations, reflecting a mixed landscape of donor practices. Some CSOs report experiencing rigid and prescriptive funding conditions, including extensive documentation requirements and donor-driven governance expectations. In these cases, donor priorities may override organisational autonomy, limiting CSOs' ability to align funded programmes with their own strategic goals or community needs.

Conversely, other CSOs describe more collaborative relationships, where donors maintain clear reporting expectations but also offer flexibility, respect for internal decision-making, and space for dialogue. Reporting formats are generally standardised and predictable, with most donors requiring semi-annual or annual submissions. This consistency supports planning and accountability, though the volume and frequency of reporting can still strain smaller organisations with limited administrative capacity.

Donor responsiveness to changing operational environments and emerging needs is uneven. While some donors adapt their funding frameworks to accommodate shifts in CSO missions or external conditions, others maintain rigid programmatic boundaries. This limits the ability of CSOs to pivot in response to evolving community priorities or crises.

Security concerns are not widely addressed in donor frameworks. There is limited evidence of proactive measures to mitigate risks or harm that may arise from funded programmes, particularly for CSOs working on sensitive issues. This gap suggests a need for greater donor awareness and engagement on safeguarding and risk management.

Overall, while donor funding remains a critical resource for CSOs in Bhutan, its effectiveness is shaped by the degree of flexibility, alignment with CSO priorities, and responsiveness to contextual realities. Strengthening mutual accountability and adaptive funding practices would enhance the impact and sustainability of donor-supported initiatives.

### **3.3 | Sustainability of Resources**

The sustainability of resources for civil society in Bhutan is challenged by a narrow and unstable funding base, with most organisations relying on short-term, project-based donor support. Funding cycles typically range from one to three years and often come with restrictions on covering core operational costs, such as personnel and administrative expenses. This structure undermines organisational stability, contributing to high staff turnover and limiting the ability of CSOs to retain institutional knowledge or invest in long-term capacity.

The concentration of funding among one or two key donors further exposes the sector to external shocks. In the current global aid climate—where development assistance is increasingly uncertain—this reliance poses a significant risk to continuity and resilience. Gaps



between funding cycles are common and can lead to interruptions in programming, loss of momentum, and weakened community trust.

Most funding remains project-specific, with limited availability of core or flexible funding that would allow CSOs to engage in strategic planning, invest in innovation, or respond to emerging needs. This constrains their ability to pursue long-term goals and build institutional sustainability.

While community-based organisations (CBOs) face some of the same challenges, their stronger volunteer base and community integration offer a more conducive environment for sustainability. However, across the sector, opportunities for self-reliance—such as local fundraising, donations, or income-generating activities—remain underdeveloped. The recent policy shift allowing CSOs to operate social enterprises is a promising step, but its impact will depend on the availability of technical support, market access, and regulatory clarity.

In sum, the current resource environment limits the ability of CSOs to plan strategically, retain talent, and sustain impact. Diversifying funding sources, increasing access to core funding, and enabling self-generated income will be critical to strengthening the long-term sustainability of the sector.

## Principle 4: Open and Responsive State

**Score: 2.6**

### 4.1 | Transparency

The constitutional guarantee of the right to access information provides a foundational legal basis for transparency. However, the absence of an enacted Right to Information (RTI) law, despite the introduction of a [bill in 2012](#), significantly weakens the operationalisation of this right. In practice, this legal gap leaves CSOs without a reliable mechanism to demand information from public institutions, particularly at subnational levels where discretionary practices may be more entrenched. As a result, CSOs face structural limitations in accessing the data required for evidence-based programming, policy advocacy, and public accountability efforts.

Government efforts to disclose certain categories of information, such as public officials' salaries and budgetary data, reflect a degree of commitment to transparency. However, these disclosures are often undermined by issues of timeliness, consistency, and accessibility. Reports from [media outlets](#) and oversight bodies such as the Social and Cultural Affairs Committee of the National Council of the Parliament [highlight](#) that much of the available data is outdated or incomplete, undermining its utility for public scrutiny. For civil society, outdated or incomplete data reduces the effectiveness of programme design and limits the ability to monitor government performance in real time. This not only weakens the credibility of civil society interventions but also restricts their capacity to engage the public and influence policy outcomes.

Procedural barriers to accessing information compound these challenges. The absence of clear, simple, and widely publicised procedures for filing information requests creates uncertainty and discourages engagement. Reports of lengthy delays and bureaucratic hurdles suggest that existing mechanisms are not only difficult to access but also inconsistently applied. For smaller or community-based CSOs, these barriers are particularly acute, as they often lack the resources to navigate complex administrative processes.

Legal protections against the denial of access to information are notably weak. The absence of formal appeals mechanisms and the lack of sanctions for non-compliance mean that public

institutions face little accountability when they fail to respond to information requests. This legal vacuum undermines the enforceability of the right to information and fosters a culture of opacity. For civil society, the inability to challenge refusals or delays effectively limits their operational space and reduces the incentive to pursue transparency-related advocacy.

While constitutional provisions and transparency initiatives exist, the broader legal and institutional framework remains inadequate. This environment of partial transparency imposes systemic constraints on civil society's ability to access, interpret, and use public information. The resulting information asymmetries weaken the foundations of participatory governance, reduce the effectiveness of civil society programming, and contribute to a restrictive enabling environment that limits civic engagement and accountability.

## **4.2 | Participation**

CSOs have experienced a notable increase in engagement opportunities with government institutions, including the Parliament. This shift reflects a growing recognition of civil society as a stakeholder in national development and policy processes. The inclusion of CSOs in the formulation of recent five-year development plans, as well as the development of frameworks such as the draft Parliament-CSO Collaboration Strategy and the Government-CSO Collaboration Guideline, signals an intention to institutionalise participation. These developments suggest a move beyond ad hoc consultations toward more structured and potentially sustainable engagement mechanisms. However, while the frequency of consultations has improved, the depth and influence of CSO participation remain uneven. In several instances, consultations have not translated into tangible policy shifts or the incorporation of civil society recommendations. This raises concerns about the substantiveness of participation, suggesting that some engagements may be more symbolic than impactful. When CSOs are consulted without their input being meaningfully considered, it undermines trust and discourages future engagement.

The participation of CSOs in national and international policy dialogues—such as those related to gender equality, disability rights, and the Universal Periodic Review—demonstrates a degree of thematic inclusivity. However, there is limited evidence that all types of CSOs are able to participate on an equal footing. This raises questions about non-discrimination in participation, as selective engagement can reinforce power imbalances and exclude dissenting or grassroots voices from shaping public policy.

In terms of modalities, both in-person and online consultation formats have been used, but their accessibility and effectiveness vary. Digital platforms can expand reach but may exclude CSOs with limited internet access or digital literacy, particularly those in rural or underserved areas. In-person consultations, while valuable for dialogue, are often limited by logistical constraints and resource availability. Without deliberate efforts to ensure inclusivity across formats, participation opportunities risk reinforcing existing inequalities within civil society.

Overall, while there has been progress in expanding the space for civil society participation, significant challenges remain in ensuring that this participation is inclusive, timely, and impactful. The current environment reflects a transition from passive consultation to more structured engagement, but the lack of consistent influence, early involvement, and equitable access continues to constrain the enabling environment for civil society. Strengthening participation requires not only formal mechanisms but also a commitment to genuine dialogue, responsiveness, and inclusivity in decision-making processes.

## **4.3 | Accountability**

While the frequency of consultations between government and civil society has increased, the lack of feedback mechanisms and transparency in how civil society input is used remains a significant gap in the accountability framework. In several high-profile instances, such as the amendment of the CSO Act in 2022—where the composition of the CSO Authority [was altered](#) to include additional government representatives from three to five—and the adoption of [four reservations](#) to the UN Convention on the Rights of Persons with Disabilities, civil society input was either disregarded or not visibly reflected in the final decisions. These examples illustrate a pattern in which consultations occur, but without corresponding government accountability for how civil society perspectives are integrated into policy outcomes.

The absence of public documentation or formal feedback explaining the rationale behind the acceptance or rejection of civil society recommendations limits transparency. Without such explanations, CSOs are left without clarity on whether their input was considered, and if not, why. This lack of responsiveness undermines trust in the consultation process and reduces the incentive for civil society to invest time and resources in future engagements.

Moreover, there are no clearly defined avenues for CSOs to follow up on the use of their input or to hold government actors accountable for disregarding it. The absence of institutionalised feedback loops—such as post-consultation reports, response matrices, or formal review mechanisms—means that civil society has limited leverage to demand justification or redress. This weakens the overall accountability ecosystem and reinforces perceptions that participation is procedural rather than substantive. Although the creation of invited spaces and collaboration strategies marks a milestone in the formal recognition of civil society, these platforms currently lack the procedural depth and transparency required to ensure that civil society contributions are meaningfully integrated into decision-making. The burden has often shifted to CSOs to improve their strategic engagement, including better coordination and messaging. While this is important, it does not substitute for the state’s responsibility to provide clear, accountable, and traceable processes for incorporating public input.

The overall conclusion is that the current accountability environment is characterised by consultation without consequence. While civil society is increasingly invited to participate, the absence of mechanisms for feedback, justification, and follow-up significantly limits the impact of their engagement. This undermines the credibility of participatory governance and constrains the enabling environment for civil society to play a meaningful role in shaping and monitoring public policy.

## Principle 5: Supportive Public Culture and Discourses on Civil Society

### Score: 3

#### 5.1 | Public Discourse and Constructive Dialogue on Civil Society

Public discourse around civil society remains uneven, shaped by a mix of recognition, scepticism, and regulatory caution. Government and political leaders tend to frame civil society actors primarily in terms of their contributions to social welfare and service delivery, particularly in areas such as livelihoods and support for vulnerable groups. These roles are generally acknowledged and appreciated, including [by Parliament](#). However, civil society’s broader [democratic functions](#)—such as promoting civic rights, policy advocacy, and government accountability—receive [limited recognition](#). This selective framing narrows the perceived legitimacy of CSOs and reinforces a view of them as peripheral to governance rather than as essential stakeholders in democratic processes.

The media plays a dual role in shaping public perceptions of civil society. On one hand, targeted efforts by CSOs to [engage the media](#)—such as through story grants and collaborative initiatives—have led to more positive coverage that highlights civil society’s contributions. On the other hand, persistent narratives portraying CSOs as overly numerous, potentially corrupt, or engaged in unauthorised fundraising continue to circulate. These narratives, often echoed in political discourse, contribute to public scepticism and reinforce tighter regulation. The result is a media environment that is not consistently supportive of civil society and that sometimes amplifies distrust rather than fostering appreciation.

A growing culture of self-censorship among CSOs, particularly in advocacy-related work, reflects the broader pressures within the public dialogue space. This trend weakens the vibrancy of civil society and limits its ability to challenge dominant narratives or propose alternative policy solutions.

At the community level, however, the picture is more nuanced. Community-based organisations often enjoy stronger relationships with local government and private sector actors, benefiting from their embeddedness in local contexts. These organisations are generally trusted by the communities they serve, although they are sometimes perceived as profit-driven entities. This localised trust provides a foundation for constructive engagement, but does not fully insulate organisations from the broader discursive challenges facing the sector.

Overall, the public discourse surrounding civil society is shaped by a combination of partial recognition, regulatory suspicion, and uneven media narratives. While there are spaces for constructive dialogue, particularly at the local level, the national discourse often limits civil society’s role to service delivery and sidelines its democratic functions. This environment constrains the sector’s ability to contribute fully to public debate and policy development, weakening both its legitimacy and its impact.

## 5.2 | Perception of Civil Society and Civic Engagement

Public understanding of civil society’s role and the broader concept of civic engagement remains limited, shaped by both structural and cultural factors. While CSOs are active in various sectors, public perception of their value is often confined to service delivery rather than democratic participation. This narrow view reflects a broader societal mindset in which citizens primarily see themselves as recipients of services rather than as active agents in governance. As a result, the perceived legitimacy of CSOs is strongest in areas such as humanitarian aid or community development, while their roles in advocacy, accountability, and rights-based work are less visible and less appreciated.

Civic education, as delivered through [formal education](#), tends to adopt a constrained interpretation of democracy. It often emphasises institutional structures and duties without sufficiently addressing the rights, responsibilities, and participatory roles of citizens in a democratic society. This limited scope restricts young people’s understanding of their potential to influence political decisions and engage in civic life. While some CSOs have initiated complementary programmes focused on social accountability, civic responsibility, and youth engagement, these efforts remain fragmented and are not yet integrated into a broader national strategy for civic education.

The cultural framing of political engagement also plays a significant role in shaping civic behaviour. A prevailing belief that being apolitical means avoiding all forms of political participation—including engagement with elected officials or policy processes—has contributed to low levels of citizen involvement in governance. This perception discourages

individuals from participating in public debates, joining civic initiatives, or holding leaders accountable. It also reinforces a passive relationship between citizens and the state, where political processes are viewed as distant or inaccessible. Despite these challenges, there are signs of emerging civic consciousness, particularly among youth and community-based groups. However, the absence of widespread, accessible civic education programmes—both in schools and through community platforms—continues to limit the scale and depth of this engagement. Without a strong foundation in civic knowledge and democratic values, citizens are less likely to view themselves as stakeholders in governance or to recognize the broader contributions of civil society.

The perception of civil society and civic engagement is shaped by a combination of limited civic education, cultural norms that discourage political participation, and a narrow understanding of CSOs' roles. These factors collectively constrain the development of an active, informed citizenry and weaken the enabling environment for civil society. Addressing these gaps requires a more expansive and inclusive approach to civic education, as well as efforts to reframe public discourse around the value of civic participation and the democratic functions of civil society.

### 5.3 | Civic Equality and Inclusion

CSOs have played a central role in advocating for the inclusion of marginalised and vulnerable groups, including women, LGBTQI individuals, persons with disabilities, people living with HIV and AIDS, and disadvantaged youth. However, their efforts continue to be [constrained](#) by structural inequalities embedded in legal, social, and economic systems. While legal frameworks and national strategies exist to promote inclusion—such as policies supporting inclusive education—their implementation is often hindered by limited financial and human resources. This implementation gap not only restricts access to services for marginalised populations but also limits the reach and effectiveness of CSO programming aimed at these groups.

Economic disparities, compounded by rapid urbanisation and youth migration, have led to the emergence of new vulnerable populations, such as informal workers and urban poor communities. These groups often fall outside the scope of traditional inclusion strategies, making it difficult for CSOs to design responsive interventions. The lack of targeted policies and data on these emerging groups further complicates civil society's ability to advocate effectively or deliver tailored services.

Socially, persistent stigma and discrimination—particularly against LGBTQI individuals and people living with HIV—continue to undermine civic equality. These attitudes not only marginalise individuals but also delegitimise the work of CSOs that represent or support them. In such environments, CSOs face reputational risks and may encounter resistance from both the public and state institutions, which can limit their access to funding, partnerships, and policy influence.

Electoral processes also reflect systemic exclusion. The current [postal ballot system](#), which requires voters to return to their place of civil registration, disproportionately affects vulnerable groups who lack the means or mobility to travel. This disenfranchisement weakens democratic participation. For civil society, this presents a dual challenge: not only must they advocate for more inclusive electoral reforms, but they must also find alternative ways to amplify the voices of those excluded from formal political processes.

The cumulative effect of these barriers is a constrained civic space in which CSOs must operate. Limited access to resources, entrenched social biases, and procedural exclusions



reduce the effectiveness of civil society initiatives and weaken their ability to foster inclusive governance. Moreover, the burden of addressing these systemic issues often falls disproportionately on CSOs, who are expected to fill gaps left by the state without adequate support or recognition.

Overall, while civil society continues to champion civic equality and inclusion, its efforts are significantly shaped—and often limited—by broader structural inequalities. These constraints not only affect the populations CSOs serve but also diminish the sector’s capacity to contribute fully to democratic development. Addressing these challenges requires a more enabling environment that supports inclusive policies, combats social stigma, and ensures that civic processes are accessible to all.

## Principle 6: Access to a Secure Digital Environment

**Score: 3.67**

### 6.1 | Digital Rights and Freedoms

Bhutan’s digital environment remains relatively open, with no reported instances of state-sponsored censorship, targeted surveillance, or cyberattacks against CSOs. This absence of overt digital repression provides a foundational level of digital freedom that enables CSOs to operate, communicate, and mobilise online without fear of state interference. The legal framework, particularly the [Information, Communications and Media Act](#), articulates protections for cybersecurity, data privacy, and redress mechanisms, offering CSOs a degree of legal assurance in their digital operations.

Social media usage is rapidly expanding, with nearly 58% of Bhutanese [citizens active](#) on various platforms. CSOs have increasingly leveraged these platforms for outreach, advocacy, and community engagement. The government’s [Social Media Policy](#) encourages responsible and transparent online behavior and invites CSOs and other stakeholders to co-develop codes of conduct. This collaborative approach signals a willingness to balance freedom of expression with responsible digital citizenship, rather than impose top-down restrictions.

However, the absence of censorship does not automatically translate into a fully enabling digital space. The current policy environment lacks detailed provisions on how misinformation, online harassment, or surveillance by non-state actors—such as private individuals or tech platforms—are to be addressed. This regulatory gap leaves CSOs vulnerable particularly when engaging in sensitive advocacy work.

Moreover, while the legal framework provides for data protection, the enforcement of these provisions remains limited. CSOs working with vulnerable populations—such as survivors of violence, LGBTQI individuals, or persons with disabilities—require robust digital safeguards to protect sensitive information. Weak enforcement mechanisms may deter CSOs from fully utilising digital tools for fear of compromising the privacy and safety of their constituents. The absence of internet shutdowns or politically motivated content filtering is a positive indicator of digital openness. However, the lack of precedent does not guarantee future restraint, particularly during politically sensitive periods such as elections. Without clear legal safeguards against arbitrary shutdowns or surveillance, the digital space remains potentially vulnerable to future restrictions.

Overall, Bhutan’s digital environment currently supports civil society engagement, with no major restrictions on online expression or access. However, the enabling potential of this



space is limited by regulatory gaps, weak enforcement of data protection, and the absence of mechanisms to address non-state digital threats. For CSOs, this means that while digital tools are available and widely used, their safe and effective use depends on stronger legal protections, clearer accountability from private platforms, and proactive measures to safeguard digital rights.

## 6.2 | Digital Security and Privacy

Bhutan's digital environment remains relatively stable, with no reported incidents of government-led cyberattacks, spyware deployment, or targeted surveillance against CSOs. There have also been no known cases of authorities shutting down CSO websites or social media accounts. This absence of digital repression provides a degree of operational security for CSOs, allowing them to maintain an online presence and engage with stakeholders without fear of state interference.

However, this apparent digital safety does not eliminate underlying vulnerabilities. Many CSOs rely on free or low-cost software solutions to manage their operations and communications, primarily due to budget constraints. While cost-effective, these tools often lack robust security features, leaving CSOs exposed to risks such as data breaches, phishing attacks, and unauthorised access to sensitive information—particularly data related to vulnerable populations. This compromises not only the privacy of beneficiaries but also the credibility and trustworthiness of CSOs themselves.

Although the Information, Communications and Media Act includes provisions for data protection and privacy, enforcement remains limited. There is little evidence of systematic monitoring or support to ensure that CSOs are equipped to comply with digital security standards or to respond effectively to breaches. There is also no documented evidence of government-linked disinformation campaigns or coordinated online harassment targeting CSOs. However, without clear legal safeguards and proactive monitoring, the digital space remains vulnerable to future misuse—whether by state or non-state actors. The lack of transparency around how social media platforms moderate content or respond to harmful activity further complicates the digital security landscape for civil society.

In summary, while Bhutan's digital environment currently poses no direct threats to civil society actors, the sector remains exposed to indirect risks stemming from weak cybersecurity infrastructure, limited enforcement of data protection laws, and reliance on insecure digital tools. These conditions constrain the ability of CSOs to operate with confidence in the digital space and pose long-term risks to the integrity of their work. Strengthening digital security and privacy protections is essential to ensuring that civil society can continue to function safely, effectively and independently in an increasingly digital civic space.

## 6.3 | Digital Accessibility

Bhutan's commitment to digital transformation has led to significant improvements in internet penetration and connectivity, which now serve as a foundation for CSOs to expand their reach and impact. The government's digital strategy, combined with a media-savvy youth population, presents opportunities for CSOs to engage more effectively with the public, mobilise support, and deliver services through digital platforms. Initiatives such as Bhutan Crowdfunding have enabled CSOs to raise funds and increase visibility, demonstrating the potential of digital tools to enhance civic engagement.

Despite these advances, digital accessibility [remains uneven](#) across the country. While urban areas benefit from relatively stable internet access, rural and remote regions continue to face infrastructural limitations, including unreliable connectivity and high service costs. These

disparities restrict the ability of CSOs operating in underserved areas to maintain a consistent online presence or to use digital tools for outreach, coordination, and service delivery. The high cost of internet services further limits the frequency and quality of digital engagement, particularly for smaller or resource-constrained organisations.

Digital literacy is another critical barrier. Both the general population and the CSO workforce exhibit low levels of information and communication technology (ICT) skills, particularly in rural areas. This is reflected in [Bhutan's low score](#) on the digital citizen engagement index. Many CSOs lack the capacity to develop strategic online content, interpret digital data, or respond effectively to online misinformation. These skill gaps reduce the effectiveness of digital advocacy and limit the sector's ability to fully leverage online platforms for civic participation.

The rapid growth of digital connectivity also introduces [new risks](#). Concerns around cybersecurity, data protection, and the ethical use of emerging technologies—such as artificial intelligence (AI)—are increasingly relevant. While AI offers potential benefits for data analysis, outreach, and service delivery, there is limited awareness and preparedness among CSOs to engage with these tools. Without adequate training and safeguards, the adoption of AI could exacerbate existing inequalities, particularly for underrepresented populations who already face barriers to digital access.

In summary, while Bhutan's digital infrastructure provides a promising foundation for civil society engagement, significant challenges remain in ensuring equitable access, digital literacy, and technological readiness. These limitations constrain the ability of CSOs to operate effectively in the digital space and to harness emerging technologies for social impact. Addressing these gaps will require targeted investments in digital infrastructure, capacity-building for CSOs, and inclusive policies that ensure all segments of society can participate meaningfully in the digital civic space.

## C) Recommendations

To strengthen the overall enabling environment for civil society in Bhutan, a holistic approach is required. This involves coordinated action across the State, civil society, the public, and the donor community, with targeted interventions that address legal, institutional, digital, and socio-cultural barriers.

### Engagement with the State and Regulatory Authorities

To address the limited influence of civil society in decision-making and the absence of formal accountability mechanisms, there is need to:

- Institutionalise structured engagement platforms by operationalising and resourcing frameworks such as the Government-CSO Collaboration Guidelines. These platforms should be linked to national priorities (e.g. the 13th Five-Year Plan) to ensure relevance and political buy-in.
- Promote transparency and feedback loops by requiring public institutions to publish post-consultation reports that explain how CSO input was used or why it was not adopted. This would enhance trust and accountability in participatory processes.
- Support joint implementation of reform agendas, such as the Universal Periodic Review (UPR) recommendations, where CSOs can play a defined role in monitoring and reporting. This creates shared ownership and incentivises state-CSO collaboration.

- Strengthen legal protections for civic freedoms by introducing explicit legal provisions in the CSO Act that protect CSOs from arbitrary interference, including the right to appeal registration denials or cancellations through an independent mechanism. This should include clarifying grounds for refusal or cancellation of registration.
- Reduce the administrative burden of registration and annual renewal by simplifying documentation requirements and introducing differentiated compliance thresholds based on CSO size and scope. This should include extending the validity of registration certificates beyond one year to reduce bureaucratic pressure.
- Expand tax incentives for individual and corporate donations to CSOs, and review and revise the endowment and operational reserve requirements to ensure they do not exclude smaller or emerging CSOs.
- Simplify the process for obtaining public collections certificates, explore exemptions for small-scale or community-based fundraising, and provide clear guidelines and support for CSOs operating social enterprises, including access to markets and technical assistance.
- Maintain financial disclosure requirements but ensure they are proportionate and do not deter donors or overburden CSOs.

### **Influencing Public Perception and Civic Culture**

To counter misconceptions about civil society and promote civic engagement, there is need to:

- Amplify positive narratives by documenting and disseminating success stories of CSO contributions, especially in governance, rights advocacy, and community resilience. This can be done through partnerships with media and youth influencers.
- Invest in civic education that goes beyond formal schooling to include community-based programmes, digital campaigns, and youth-led initiatives. These should emphasise the role of civil society in a democracy and the rights and responsibilities of citizens.
- Foster inclusive public discourse by supporting platforms for dialogue between CSOs, government, and citizens that are respectful, evidence-based, and representative of diverse voices, including marginalised groups.
- Sustaining discourses on civil society as a necessity in a democratic society through civic education programmes, publications, media engagement, and youth engagement.

### **Civil Society Capacity and Sustainability**

To address capacity gaps in advocacy, digital engagement, and financial sustainability there is need to:

- Strengthen CSO capacity for policy engagement through targeted training in political literacy, strategic communication, and evidence-based advocacy. This includes building skills to navigate digital platforms and counter disinformation.
- Enhance digital readiness by supporting CSOs to improve cybersecurity practices, adopt secure digital tools, and build competencies in emerging technologies such as AI. This is critical for protecting sensitive data and expanding digital outreach.
- Support sustainable financing models by exploring innovative funding mechanisms such as social enterprises, public-private-CSO partnerships, and community-based

fundraising. This includes technical support for building endowments and reserve funds.

- Facilitate peer learning and knowledge exchange on resource mobilisation, digital transformation, and inclusive programming, especially among smaller or rural-based CSOs.
- Invest in building strong governance systems, financial management, and long-term strategic plans to enhance credibility and resilience, and regularly review and adapt organisational missions and programmes to remain relevant and responsive.
- Build donor engagement strategies that communicate impact and value to attract sustained support.
- Strengthen thematic alliances and networks to share resources, amplify advocacy, and engage more effectively with the state and donors, and advocate collectively for regulatory reforms and a more enabling environment for civil society.
- Prioritise staff development in areas such as proposal writing, monitoring and evaluation, digital tools, and fundraising. This should include leveraging volunteerism and community engagement to build grassroots support and legitimacy.

### Donor Coordination and Strategic Support

To ensure donor support is aligned, efficient, and responsive to CSO needs, there is need to:

- Establish a development partners' group on civil society to coordinate funding priorities, share insights, and avoid duplication. This group can also advocate for enabling policy reforms in collaboration with national stakeholders.
- Create a pooled capacity-building fund for demand-driven training and technical assistance, prioritising thematic clusters or networks of CSOs. This approach ensures relevance, sustainability, and scale.
- Support a flexible empowerment grant mechanism that allows CSOs to respond to emerging challenges, invest in institutional development, and innovate in their programming.
- Shift from short-term, project-based funding to longer-term, core support that allows CSOs to invest in institutional development, retain staff, and plan strategically, and allow for reasonable allocation of funds to cover administrative and personnel costs.
- Engage CSOs in co-designing programmes to ensure alignment with local needs and organisational missions, and simplify application and reporting processes, especially for smaller CSOs, and provide capacity-building support where needed.
- Incorporate risk assessments and safeguarding measures into funding frameworks, particularly for CSOs working on sensitive or rights-based issues, and be responsive to CSOs' security concerns and flexible in adapting programmes to changing operational environments.
- Support initiatives that promote CSO self-reliance, such as social enterprise development, local fundraising strategies, and digital transformation, and fund platforms for peer learning, collaboration, and knowledge exchange among CSOs.

## Research process

Each principle encompasses various dimensions which are assessed and aggregated to provide quantitative scores per principle. These scores reflect the degree to which the

environment within the country enables or disables the work of civil society. Scores are on a five-category scale defined as: fully disabling (1), disabling (2), partially enabling (3), enabling (4), and fully enabling (5). To complement the scores, this report provides a narrative analysis of the enabling or disabling environment for civil society, identifying strengths and weaknesses as well as offering recommendations. The process of drafting the analysis is led by Network Members; the consortium provides quality control and editorial oversight before publication.

For Principle 1 - which evaluates respect for and protection of freedom of association and peaceful assembly - the score integrates data from the [CIVICUS Monitor](#). However, for Principles 2–6, the availability of yearly updated external quantitative indicators for the 86 countries part of the EUSEE programme are either limited or non-existent. To address this, Network Members convene a panel of representatives of civil society and experts once a year. This panel uses a set of guiding questions to assess the status of each principle and its dimensions within the country. The discussions are supported by secondary sources, such as [V-Dem](#), the [Bertelsmann Stiftung Governance Index](#), the [RTI Rating from the Centre for Law and Democracy](#), and other trusted resources. These sources provide benchmarks for measuring similar dimensions and are complemented by primary data collection and other secondary sources of information available for the country. Guided by these deliberations, the panel assigns scores for each dimension, which the Network Members submit to the Consortium, accompanied by detailed justifications that reflect the country's specific context. To determine a single score per principle, the scores assigned to each dimension are aggregated using a weighted average, reflecting the relative importance of each dimension within the principle. This approach balances diverse perspectives while maintaining a structured and objective evaluation framework.

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