EU SEE
SUPPORTING
AN ENABLING ENVIRONMENT
FOR CIVIL SOCIETY

Country Focus Report

Zambia

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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 (NMs). Rather than offering a singular index to rank countries, the report aims to measure the enabling environment for civil society across the six principles, discerning dimensions of strength and those requiring attention.

Brief overview of the Country context

Zambia is a relatively stable democracy that has experienced two peaceful political transitions from the ruling party to the opposition (2011 and 2021) in the last 15 years, raising hopes for a model of a democratic state in Southern Africa. The current government (United Party for National Development – UPND) has enacted some progressive reforms, including the repeal of the defamation of the president law, a ban on political "cadreism," and the long awaited Access to Information Act operationalised in 2024.

These developments do, however, co-exist with significant regressions. The selective application of the law by law enforcement, the persistent dependence on colonial era regulations such as the Public Order Act, the expanding use of digital monitoring under the recently enacted Cyber Security Act (2025) and the proposed Constitution Amendment Bill No. 7 of 2025 continue to be major concerns. The Constitution Amendment Bill No. 7, deferred by President Hichilema on 26 June 2025 after public outcry and consultations with key stakeholders, has raised concerns among civil society and legal experts over its potential to entrench executive power and weaken democratic transparency. Together, these changes have produced a complicated civic context where official actions that restrict rights, especially those of journalists, human rights advocates and government critics, can occasionally erode progress that appears to have been made over the years.

Although Zambian civil society groups are legally recognised and have access to both domestic and foreign funding, sustainability is still a major concern. CSOs, particularly those offering and complementing vital services in the fields of service delivery such as health and

education, have been severely impacted by the recent reduction in funding from USAID. The vulnerability of marginalised populations has increased as a result of numerous organisations cutting back on, or shutting down their operations.

Engagement between civil society and the state appears to be progressive, notably through Zambia's 2024 membership in the Open Government Partnership (OGP). However, responsiveness varies, with governance focused Civil Society Organisations (CSOs) and those perceived as government critics facing more resistance than service delivery oriented ones. In terms of Publc trust in civil society, it appears to have mixed emotions.

Further, regarding financing, many CSOs rely heavily on foreign donor funding, which can create vulnerabilities and potentially hinder their ability to advocate for national interests due to this instability. Some CSOs have been criticised for lacking sufficient transparency and accountability in their operations, raising concerns about how funds are used and whether they are effectively meeting their objectives.

B) Assessment of the Enabling Environment

Principle 1: Respect and Protection of Fundamental Freedoms *Score: 3.1*[1]

The rights to freedom of association, peaceful assembly and expression are enshrined in Zambia's Constitution and affirmed in international human rights instruments to which Zambia is a party. However, in practice, the enabling environment has shown signs of deterioration over the past year, with increasing selective enforcement of laws, and new legislative threats that undermine constitutional protections. The CIVICUS Monitor classifies Zambia's civic space as "Obstructed," noting that despite promises of reform, civic actors still face legal ambiguity and increasing political pressure. These developments reflect a troubling shift toward greater state control over civil society, endangering the vibrancy and independence of citizen-led advocacy and service delivery. While some opportunities remain for civic engagement, particularly in non-political or state aligned activities, the broader trajectory reflects heightened restrictions and legal uncertainty for CSOs, activists, and journalists.

1.1 | Freedom of Association

Zambia's legal and constitutional framework guarantees the right to freedom of association. Article 21 of the 1991 Constitution (amended in 2016) affirms every person's right to associate freely with others, including the right to form or belong to political parties, trade unions, or other interest groups. In theory, Zambian law guarantees freedom of association, including the right of individuals and groups to form and operate CSOs.

However, a threat to civil society's enjoyment of this right is the government's revived attempt to introduce a more restrictive NGO law. The NGO Bill No. 6 of 2025, currently before Parliament, proposes extensive financial disclosures, forced membership in a centralised government controlled body, and criminal penalties for administrative missteps. These measures have drawn widespread criticism from domestic civil society coalitions who argue that the bill threatens the autonomy of NGOs and undermines constitutional freedoms.

1.2 | Freedom of Peaceful Assembly

[1] 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 52/100, which has been converted to fit our 1–5 scale.

The right to peaceful assembly is constitutionally guaranteed in Zambia under Article 21 of the Constitution, which protects the freedom to assemble and express collective interests. In theory, this right allows citizens, civil society organisations and other groups to organise and participate in protests, marches, and demonstrations. However, in practice, the exercise of this right is often limited by legal and administrative barriers, particularly through the enforcement of the Public Order Act (Chapter 113 of the Laws of Zambia). The Public Order Act requires individuals or groups intending to hold a public gathering to notify the police at least seven days in advance. While this is framed as a notification system, in practice it functions more like a permit regime, as the police retain broad discretion to approve, delay, or prohibit assemblies. This discretion is frequently used to restrict gatherings viewed as critical of government policy or politically sensitive.

Civil society organisations face a risky landscape for organising public assemblies. While issue based events, especially those aligned with social services or public welfare, are permitted, assembly rights remain contingent on topic selection and political sensitivity. CSOs and civic groups are generally allowed to hold public protests, particularly when their causes are non-political or align with government priorities. For instance, in April 2025, a coalition of NGOs successfully held a peaceful protest to raise awareness about the alarming rise in defilement cases. The demonstration was authorised by the relevant authorities and proceeded without interference. However, this tolerance appears inconsistent and selective.

In 2024, a group of citizens seeking to protest against the persistent power outages attributed to the national utility company, ZESCO, was denied a permit by the Inspector General of Police, and some of the protestors were arrested. On 18 May 2024, police disrupted a meeting between former President Edgar Lungu and Bishop Clement Mulenga in Kabwe, citing the absence of formal police authorisation, despite lawful intent. The Zambian Human Rights Commission condemned the intrusion as a violation of assembly rights. On 8 June 2024, heavily armed security were deployed to break up a Socialist Party rally in Kitwe even after organisers had complied with notification requirements, demonstrating a pattern of using force even in lawful assemblies. This disparity in treatment illustrates the uneven application of the Public Order Act, which grants law enforcement broad discretion to approve or reject public assembly notifications, often in ways that suppress dissent or protests perceived as politically sensitive.

Human Rights Watch's World Report 2025 highlights how law enforcement in Zambia increasingly leveraged the Public Order Act to refuse authorisation for opposition meetings and political rallies, even when protesters notified authorities in advance. In addition, a joint statement by UN Independent experts in August 2024 raised alarm over repeated arbitrary arrests and denials of assembly, particularly targeting activists, opposition figures, and civilian groups. The experts flagged this as a crisis in Zambia's compliance with fundamental freedoms

Fear of arrest, harassment, or violent dispersal continues to discourage citizens from organising or participating in peaceful assemblies. There are also concerns about the lack of judicial redress in cases where protests are unjustly blocked or protesters are mistreated. Inconsistent enforcement of law increases legal and reputational risk for CSOs, pushes marginalised groups to self-censor, and undermines collective mobilisation. In the lead up to the 2026 elections, these constraints could stifle civic engagement, reduce accountability, and erode public faith in democratic processes.

1.3 | Freedom of Expression

Freedom of expression in Zambia is constitutionally protected under Article 20 of the Constitution, which guarantees every person the right to freely express ideas and opinions, seek, receive, and impart information. While the legal framework appears supportive, the practical enjoyment of this right remains constrained. Over the past year, Zambia has experienced a mixed trajectory. There have been some efforts toward media reform and broader access to information; however, these have been overshadowed by increased censorship, intimidation of journalists, online surveillance and political intolerance, particularly in relation to criticism of state actors.

In April 2025, the *MISA Zambia Annual State of the Media Report* flagged rising cases of harassment of journalists reporting on government corruption and failures in public service delivery. In February 2025, Diamond TV journalist Brian Mwale was summoned for questioning by police after airing a segment that critiqued the delayed distribution of farming inputs, a clear example of how journalistic scrutiny can lead to intimidation. In a separate case, journalist Thomas Zgambo was arrested as arrested in connection with his reporting, further illustrating the shrinking space for investigative journalism in Zambia. These incidents reflect a broader pattern of repression aimed at silencing dissenting voices in the media.

The 2024 Freedom House report categorised Zambia as "Partly Free", noting persistent pressure on journalists and media institutions, despite the relative openness following the 2021 elections. The CIVICUS Monitor cited ongoing restrictions on critical voices, particularly online. Additionally, the 2024 World Press Freedom Index ranked Zambia 118 out of 180 countries, highlighting concerns about editorial independence, intimidation of reporters, and government interference in media operations.

Restrictions on freedom of expression significantly affect the operating space of civil society organisations. CSOs working on governance, transparency, and accountability are especially vulnerable to backlash when they publicly critique government policies. The hostile environment forces many to self-censor or avoid direct confrontation, reducing their ability to advocate boldly for policy reforms. Journalists and bloggers allied with civic actors face harassment, arrests, and online trolling, which limits partnerships between media and CSOs. The chilling effect on expression undermines public discourse, reduces access to accurate information, and stifles citizens' ability to meaningfully participate in democratic governance.

Principle 2: Supportive Legal and Regulatory Framework Score: 2.7

Zambia's legal environment for CSOs is partially enabling. CSOs can legally register through various agencies, but the process is often complex, slow, and inaccessible for smaller or community-based groups. Registration is mandatory, and unregistered entities face legal penalties and exclusion from funding. While the law allows CSOs to operate and collaborate, state oversight can limit full autonomy, particularly for organisations working on governance and human rights. Protection from interference remains weak, with broad state powers to suspend or deregister CSOs on vague grounds. The proposed NGO Bill of 2025 has raised serious concerns across civil society due to provisions that may increase government control and further restrict civic space. Despite legal pathways for operation, practical and political barriers continue to hinder a fully supportive environment for civil society in Zambia.

2.1 | Registration

In Zambia, operating a CSO without registration is technically not permitted under the law, depending on the nature and activities of the organisation. The NGO Act No. 16 of 2009, in

particular, requires all non-governmental organisations (NGOs) operating in Zambia to be registered with the NGO Registration Board. Section 10 of the Act prohibits the operation of CSOs without registration. Similarly, under the Societies Act (Cap. 119), it is an offence to operate an unregistered society. Section 6(1) of the Societies Act provides for mandatory registration of associations in Zambia. Operating a society without registration is an offence under this law. However, in practice, many grassroots community groups and informal networks operate without formal registration, especially at local levels, and this is often tolerated by authorities. These groups may not be prosecuted but remain legally vulnerable and lack access to funding, legal protection, and formal partnerships. This informal operation exists more as a practical reality than a legally sanctioned right.

CSOs can register through several regulatory bodies: the NGO Registration Board under the Ministry of Community Development and Social Services, the Registrar of societies under the Ministry of Home Affairs and Internal Security, or the Patents and Companies Registration Agency (PACRA) under the Companies Act No. 10 of 2017. Although each route offers a legal pathway for operation, the process is often complex, time consuming, and resource intensive, particularly for grassroots organisations with limited capacity. Bureaucratic red tape, complicated paperwork and long wait times continue to pose obstacles, especially for smaller, community based groups or individuals with limited literacy. For instance, many applicants struggle to navigate the legal jargon embedded in registration forms.

Registered CSOs renew their registration every five years and submit annual reports on their activities and finances. Non-compliance may result in fines, suspension, or deregistration. Despite these requirements, there have been no widely reported cases of registration refusals in recent years, indicating a generally open although slow and challenging registration environment.

Looking ahead, the proposed NGO Bill of 2025 has raised concerns across civil society The draft bill introduces concerning provisions, such as mandatory affiliation to a central government regulated body and criminal penalties for procedural lapses. While consultations with CSOs have been held, several contentious elements remain. A coalition of 12 NGOs has raised alarm, warning that unless the bill is significantly revised, it could give the government too much control over civil society and restrict operational independence.

While CSOs in Zambia have legal pathways to registration, the process is far from easy or equitable. Structural barriers continue to hinder access, particularly for marginalised actors. Proposed legal reforms raise concerns about further narrowing the civic space under the guise of regulation.

2.2 | Operational Environment

In Zambia, the legal framework permits CSOs to operate, but with some limitations. According to Section 11(5) of the NGO Act No. 16 of 2009, CSOs are allowed to define their objectives, internal governance systems, areas of operation, and affiliations as part of the registration process. However, Section 7(b) of the Act grants the NGO Registration Board the authority to approve the area of work of NGOs, which limits their full autonomy and makes operational activity conditional upon state approval.

Once registered, CSOs may implement their programmes in line with their constitution, and they are generally not required to seek repeated approvals for each activity. The law permits them to associate, collaborate, and network with organisations, both domestically and internationally, including through online platforms.

In practice, however, the level of autonomy may vary depending on the nature of a CSO's work. Organisations engaged in governance, accountability, or human rights issues sometimes face heightened scrutiny, including surveillance and digital harassment.

While Zambia's legal framework formally supports the autonomy of CSOs to operate, collaborate, and govern themselves freely, the political climate and administrative practices can undermine this autonomy, especially for those engaging in advocacy, governance and human rights.

2.3 | Protection from Interference

The level of protection from interference for CSOs in Zambia is limited and inconsistent. Key provisions in the NGO Act grant the state broad discretionary powers that can be used to interfere with critical CSOs. For example, Section 17 allows for the suspension or cancellation of a CSO's registration based on vague criteria, such as pursuing activities "not in the public interest" or contravening any aspect of the Act or the Code of Conduct. These grounds are open to interpretation and can be used selectively against CSOs that challenge government policy.

CSOs that focus on service delivery or charitable work in Zambia generally operate with minimal obstruction and are less likely to be targeted for scrutiny. In contrast, CSOs engaged in human rights monitoring, civic education and advocacy are more exposed to interference, both direct and indirect. Although no systematic pattern of outright closure has been recorded, the climate of uncertainty and inconsistent enforcement weakens institutional protection for certain segments of civil society.

Furthermore, the Act's requirement for registration renewal every five years , coupled with the need to submit annual reports on activities and finances, creates an administrative burden that disproportionately affects smaller and community-based organisations.

Although the law allows for inspections and oversight to ensure accountability, these mechanisms are frequently viewed by CSOs as punitive rather than supportive, particularly for organisations engaged in governance, human rights, or anti-corruption work. As a result, CSOs operate in a climate of legal uncertainty, with limited protection from state interference and heightened vulnerability to politically motivated harassment.

Principle 3: Accessible and Sustainable Resources
Score: 2.8

While Zambia's legal framework allows CSOs to access domestic and international resources, the environment is marked by certain constraints that limit the effectiveness and sustainability of this support. Funding is heavily donor driven, with rigid conditions and minimal core support, making it difficult for many organisations, especially smaller or advocacy-focused CSOs, to respond flexibly to emerging needs or plan for long-term growth. The absence of robust domestic fundraising mechanisms, tax incentives, or state supported grant schemes further weakens financial sustainability. Despite these challenges, some CSOs are adopting innovative strategies to diversify resources and build resilience. However, without structural reforms, long-term sustainability remains uncertain.

3.1 | Accessibility of Resources

Access to resources for CSOs in Zambia is legally permitted and structurally possible, including for those working on sensitive topics or with marginalised communities. The current

legal framework does not prohibit domestic or international funding, and CSOs are generally free to seek financial support from a variety of sources.

Information on funding opportunities is publicly available, particularly through donor websites and networks. However, accessibility is uneven. Well established CSOs based in urban areas are more likely to have the digital tools, proposal writing skills, and institutional track records required to navigate application processes. In contrast, smaller or rural-based organisations often lack the capacity to respond effectively to calls for proposals, despite open eligibility. Many proposal formats also remain highly technical, which creates additional barriers for grassroots actors.

Furthermore, Zambia lacks strong tax incentives for local donations. According to the African Philanthropy Forum, there is no strong framework for tax deductions or exemptions to encourage domestic philanthropy, and CSOs are not broadly shielded from tax burdens that could otherwise support their sustainability. As such, the sector remains heavily reliant on external funding, making it vulnerable to shifting donor priorities, rigid thematic restrictions, and burdensome reporting demands. Political and institutional dynamics can further affect funding availability, creating an environment of uncertainty. As noted in a 2022 joint study by SAIPAR and the Zambia Governance Foundation, these dynamics contribute to an environment of unpredictability and financial insecurity, especially for organisations engaged in rights-based or governance work.

Overall, resources are available and accessible to many CSOs, but access is uneven and often skewed in favour of more established entities. The absence of enabling tax incentives and the occasional financial sector challenges limit equitable access, particularly for newer or advocacy oriented organisations.

3.2 | Effectiveness of Resources

While donor funding remains the primary source of support, most CSOs are able to access and utilise these resources to implement programmes aligned with their missions. In general, donor-CSO relationships are collaborative, and many donors respect the governance and autonomy of recipient organisations.

Most funding arrangements include defined priorities and structured reporting requirements, which are standard practice and not inherently restrictive. Expert participants noted that donor priorities can at times conflict with local cultural norms or community realities, which undermines the effectiveness and sustainability of civil society interventions. This challenge is more serious for organisations operating in governance, accountability, or rights based work, as these sectors often intersect with politically sensitive issues. In Zambia's increasingly politicised environment, such CSOs may face additional pressure, not only from the state but also from funders, who may shy away from perceived political engagement, thereby limiting funding autonomy and narrowing the scope of work.

In general, larger and more established organisations fare better under these conditions, as they often have the systems, structures, personnel, and donor relationships necessary to navigate complex funding requirements. These organisations are more likely to deliver results within the parameters set by donors. In contrast, smaller and grassroots organisations are at a disadvantage, lacking the institutional infrastructure to meet reporting obligations or manage restricted funds effectively. This results in uneven operational effectiveness across the sector, with emerging CSOs struggling to remain relevant and impactful.

In recent years some donors have also taken steps to mitigate potential harms by incorporating risk assessments, safeguarding mechanisms, and occasionally offering flexible funding components or wellbeing support for staff involved in high-risk work.

3.3 | Sustainability

Most CSOs rely heavily on short term, project based grants from foreign funders. This has created an environment where strategic planning, institutional growth, and staff retention are persistently undermined.

The funding landscape is largely donor driven and marked by a lack of core or flexible funding that would allow organisations to build internal capacity, innovate, or respond to emerging needs. Instead, the emphasis on tightly scoped project funding means that CSOs must continuously pivot to align with shifting donor priorities, many of which are influenced by external political, economic, or global development trends rather than grounded local needs.

In 2025, the situation has further deteriorated, with the suspension of major donors such as USAID leading to the downsizing or closure of some organisations. This development has highlighted the sector's heavy dependency on foreign funding and the absence of reliable domestic alternatives. Government supported grant mechanisms are minimal and local philanthropy remains underdeveloped and informal, offering little in terms of sustained or predictable financial support.

Additionally, funding gaps between project cycles are common, resulting in operational delays, loss of key personnel, and, in some cases, the halting of ongoing programmes. This fragility affects not only individual organisations but the broader civil society ecosystem, as collaboration, continuity, and long term impact can be compromised.

Despite these challenges, many Zambian CSOs have taken proactive steps to diversify funding and promote self-reliance. Some operate income generating ventures, such as farm enterprises or social businesses, to offset operational costs. Others have begun exploring crowdfunding, engaging volunteers for in kind support, and securing multiple donor streams from bilateral and multilateral partners.These efforts, while still limited in scale and reach, signal a commitment to building resilience beyond single source dependency.

The overwhelming reliance on short-term, restricted grants means that organisations are often locked into fixed activities and deliverables, with little flexibility to innovate, pivot, or sustain programmes beyond a single funding cycle. In most cases, core funding, necessary for institutional development, staff retention, and internal systems strengthening, is either unavailable or extremely limited. This lack of unrestricted funding prevents many CSOs from building reserves, investing in long-term strategies, or scaling successful initiatives. As a result, organisational sustainability is weakened, and the broader civil society sector remains highly vulnerable to shifts in donor priorities and external funding shocks.

Principle 4: Open and Responsive State
Score: 2.8

There has been noticeable progress in the openness and responsiveness of the state in Zambia, most notably, the enactment of the Access to Information (ATI) Act No. 24 of 2023 and Zambia's accession to the Open Government Partnership (OGP) in 2024. However the practical realisation of an open and responsive state remains limited. While the legal and policy frameworks suggest increased transparency and civic inclusion, implementation is

inconsistent, and genuine state responsiveness to civil society input is weak and often symbolic. CSOs face significant barriers to meaningful participation, especially in politically sensitive areas, and feedback mechanisms are fragmented or absent. Although some public institutions engage constructively in selected sectors like health or education, broader government culture continues to lack the transparency, accountability, and inclusivity necessary for a fully enabling civic space.

4.1. | Transparency

The enactment of the Access to Information (ATI) Act No. 24 of 2023 marked a significant legal milestone in advancing transparency in Zambia. For the first time, the Act legally affirms the right of all individuals and CSOs to access information held by public institutions and entities performing public functions. This includes critical information such as draft policies, administrative decisions, budget documents, expenditure reports, and audits. While the legislation came into force in June 2024, its implementation remains inconsistent across institutions. There is currently limited infrastructure, inadequate institutional responsiveness, and a lack of training among government personnel, which hinders full compliance with the ATI framework. Many ministries and agencies are not yet equipped to handle access requests efficiently or consistently.

In theory, the law outlines clear procedures for filing ATI requests, and it aims to make the process inclusive. However, in practice, these procedures are not yet fully operational or accessible. Moreover, proactive disclosure of information by public institutions remains limited. While the ATI Act requires government bodies to publish key documents such as policy drafts, budgets, and audit reports, timely and accessible publication is still rare. Many government websites remain outdated or lack comprehensive documentation, creating barriers to digital access for the general public and marginalised communities. While the country's accession to the Open Government Partnership (OGP) in 2024 represents a step toward greater openness, the adoption and integration of OGP standards into national governance frameworks remain in progress.

Overall, while the legal framework represents a positive step toward transparency, practical challenges related to capacity, responsiveness, and enforcement continue to hinder full realisation of the law's potential.

4.2 | Participation

In Zambia, CSOs are sometimes consulted by policymakers and political leaders on policies relevant to their areas of expertise and constituencies. They are technically included in participatory structures such as the Eighth National Development Plan (8NDP) Clusters and Cluster Advisory Groups. While CSOs may attend meetings or submit input, their contributions are not always reflected in policy decisions, leading to perceptions of tokenistic or symbolic involvement, especially in politically sensitive areas like constitutional reform or public order legislation.

Government receptiveness to civil society participation tends to be stronger on development related issues such as health, education, and sanitation than on matters of governance, accountability or rights. For example, CSO advocacy and input on critical reforms, including the Public Order Act, constitutional amendments, and the NGO Bill, has often been met with resistance or delayed responses.

Some organisations, such as the Christian Churches Monitoring Group (CCMG) and Transparency International (TI-Z), have established stronger relationships with specific government agencies, particularly in areas like electoral and anti-corruption reform. However,

these are exceptions. Government interaction with CSOs is inconsistent and often influenced by the perceived political alignment of the organisations involved. A major structural flaw is the absence of formal feedback mechanisms. After consultations or public dialogues, CSOs rarely receive updates on whether their inputs were accepted, modified, or rejected. This lack of transparency reduces trust and discourages ongoing engagement, weakening the broader accountability framework.

In terms of inclusivity, participation is not fully non-discriminatory. Larger and more established organisations are more likely to be invited to high-level engagements, whereas grassroots groups and those critical of the government have limited access and fewer opportunities to engage meaningfully. This selectivity in participation creates uneven representation across the sector.

Moreover, CSOs are not consistently invited at the earliest stages of policymaking. Many report being involved only once decisions are already under way, with little time or space to influence the direction of reforms. Feedback opportunities are often rushed, and meetings are held with short notice, limiting the ability of CS actors to prepare and provide substantive input. Despite President Hichilema's 2024 directive calling for more formalised civil society involvement in governance processes, implementation has been limited. Feedback from CSOs indicates that only a select few organisations are consistently engaged, leaving many actors, especially those working in advocacy, excluded from meaningful participation.

4.3 | Accountability

Zambia's government provides some feedback to civil society actors following consultations, though the practice is not uniform across sectors. In specific instances, such as the enactment of the Access to Information (ATI) Act in 2023, some CSOs were engaged and received updates or revised drafts reflecting some of their input. Civil society coalitions such as the Zambia Council for Social Development (ZCSD) and MISA Zambia actively participated in these processes. However, such examples remain isolated rather than standard practice. Many ministries do not publish summaries of consultations or provide detailed feedback on how input has influenced final decisions. The 2023 Open Budget Survey scored Zambia 41/100 in public participation and 35/100 in budget oversight, indicating a lack of transparency and limited feedback loops.

Recent legislative processes—most notably the proposed Constitution Amendment Bill No. 7 of 2024 and the Cyber Security and Cyber Crimes Acts—have exposed persistent gaps in the government's engagement with civil society and other stakeholders including regular citizens. While the deferment of Bill No. 7 in June 2025, following sustained pressure from civil society and religious leaders, marked a rare instance of state responsiveness, it also underscored the reactive rather than proactive nature of government consultation. Civil society remains cautious, drawing from the experience of the Cyber Security legislation, where initial consultations were held but ultimately disregarded. In that case, collectives including organizations such as Peoples Action for Accountability and Good Governance in Zambia (PAAGZ), Aliiance for Community Action (ACA), Civil Society for Poverty Reduction (CSPR), Panos, Bloggers of Zambia and other digital rights advocates publicly criticised the lack of meaningful participation and the government's failure to incorporate stakeholder input into the final law—raising concerns about the authenticity of consultative processes.

Some mechanisms exist for civil society to follow up on their contributions, but these platforms are often unclear, inconsistent, or poorly resourced. Civil society participation in structures such as the National Development Coordinating Committee (NDCC), Provincial and District Development Coordinating Committees (PDCCs/DDCCs), and sectoral advisory groups

provides opportunities for continued engagement. However, the effectiveness of these forums varies across institutions.

Monitoring and reporting on government commitments and responsiveness to civil society input is mostly carried out by CSOs themselves. Organisations like the Christian Churches Monitoring Group (CCMG) and Transparency International Zambia (TI-Z) independently track electoral and governance related commitments. Without a formal government process that mandates transparent reporting on feedback integration, civil society's monitoring efforts remain largely external and voluntary, with limited official recognition or impact on future consultations.

Principle 5: Supportive Public Culture and Discourses on Civil Society

Score: 3.0

Zambia's public culture and discourses on civil society is characterised by a mix of recognition, suspicion, and unequal access. CSOs play an important role in service delivery and civic education, and are occasionally acknowledged in public discourses for their contributions to national development. However, scepticism toward CSOs, especially those engaged in governance, rights, and accountability is widespread, particularly from political actors and some state owned media. Public trust in civil society remains uneven, and civic participation is still largely tied to electoral cycles rather than being a sustained part of democratic life. Inclusion is legally guaranteed but inconsistently realised in practice, especially for marginalised groups such as rural populations, women, youth, and linguistic minorities. Overall, while there are elements of support and openness, Zambia's civic culture remains only partially enabling, hindered by structural and perception based barriers.

5.1 | Public Discourse and Constructive Dialogue on Civil Society

The government and political leaders in Zambia nominally recognise civil society organisations as important stakeholders, particularly in development areas like health and education. However, they generally treat CSOs as peripheral actors in governance and human rights sectors, engaging them formally but often limiting their influence on key policy decisions. For example, during the consultations on the NGO Act and the Access to Information Act, government officials acknowledged CSO input but did not fully integrate it into final legislation. The appointment of civil society figures to government advisory or diplomatic positions reflects respect for the sector, though some observers express concerns about potential co-optation.

Media coverage of CSOs in Zambia presents a balanced picture, showcasing both positive contributions and occasional criticism without strong bias. Independent outlets such as The Mast and Zambia Reports frequently highlight the valuable role of CSOs in governance advocacy and service delivery, contributing to public appreciation of their work. Conversely, state-owned media like the Zambia National Broadcasting Corporation (ZNBC) provide coverage that includes CSO perspectives alongside government views, avoiding overt negativity. Negative portrayals of CSOs are generally mild and infrequent, often limited to discussions around politically sensitive issues such as electoral monitoring. This balanced media portrayal helps maintain public trust in civil society, without significantly undermining their legitimacy.

Political dialogue involving CSOs is characterised by both constructive engagement and occasional tension. CSOs are regularly invited to participate in policy consultations and

parliamentary hearings where their evidence and recommendations are considered. However, in politically sensitive contexts, such as election periods or anti-corruption reforms, dialogue can become more polarised, limiting the incorporation of civil society perspectives. Despite these challenges, civil society actors maintain a presence in national debates and contribute to shaping policy discussions.

5.2 | Perception of Civil Society and Civic Engagement

Public perception of civil society in Zambia is moderately positive, with a fair share of citizens acknowledging the role CSOs play in service delivery, advocacy, and promoting government accountability. However, skepticism exists, particularly among rural and politically marginalised populations, who sometimes perceive CSOs as elite driven or aligned with opposition politics. The panel of experts emphasised that public trust is stronger where CSOs are visibly active in addressing local needs.

Citizens' belief in their own ability to influence political decisions is present but inconsistent across regions and demographics. While voter turnout in Zambia remains relatively high (66.7% in the 2021 general elections according to the Electoral Commission of Zambia), sustained civic engagement outside elections is limited. Although some communities, particularly in urban areas, participate in initiatives like the Constituency Development Fund (CDF), rural populations, women, and youth often remain disengaged.

Civic education in Zambia is available in schools and community programmes, but its implementation is fragmented and largely donor driven. The national curriculum includes limited content on civic rights and responsibilities, and coverage outside formal education is concentrated in urban centres. Many community programmes rely on CSOs which operate with resource and language constraints. Civic education in Zambia remains insufficiently integrated and accessible, especially for non-English speakers and those in rural areas. These gaps limit the reach and effectiveness of civic learning, contributing to poor understanding of democratic participation among large sections of the population.

5.3 | Civic Equality and Inclusion

Zambia's legal and policy frameworks formally support civic equality and inclusion. The 2016 Amended Constitution guarantees equal rights for all citizens, while the Gender Equity and Equality Act (2015) and the Persons with Disabilities Act (2012) are notable legal reforms that aim to address structural inequality and promote inclusion. Additionally, Zambia's National Gender Policy and National Youth Policy provide guiding frameworks to improve participation of marginalised groups in civic processes.

Despite these reforms, implementation remains uneven, particularly in rural and low income areas. Structural and systemic barriers including poverty, geographic isolation, limited access to education and technology continue to disproportionately affect women, youth, people with disabilities, and minority language speakers. For example, although Ward Development Committees are meant to be inclusive, participation from rural women and persons with disabilities remains limited due to poor outreach and inaccessible meeting formats.

Economic disparities and social exclusion further restrict civic participation. Many marginalised populations lack the resources, information, or confidence to participate meaningfully in civic processes. While the legal framework is progressive on paper, limited enforcement and weak accountability mechanisms have slowed the realisation of these rights in practice.

Nevertheless, marginalised groups are increasingly represented within civil society and governance structures to a moderate extent. Women's rights organisations, youth led advocacy networks, and disability rights groups play a growing role in shaping policy debates.

For instance, youth CSOs have successfully lobbied for inclusion in Constituency Development Fund (CDF) committees in several constituencies.

CSOs themselves have adopted inclusive approaches in their programming. Many actively work with marginalised constituencies, using participatory methods and local languages to promote broader engagement.

Social tolerance and diversity acceptance are present but inconsistent. While Zambia enjoys broad ethnic harmony and co-existence, certain groups, particularly sexual minorities and gender non-conforming individuals, continue to face stigma, legal exclusion, and public hostility. These dynamics discourage full civic participation from affected populations.

Principle 6: Access to a Secure Digital Environment

Score: 3.7

Zambia's digital environment remains constrained, with legal and infrastructural developments failing to fully guarantee secure, equitable, and rights respecting digital access. While internet penetration has grown, particularly via mobile platforms, significant challenges persist in the areas of digital freedom, privacy, and accessibility. The 2025 cyber laws have sparked widespread concern among civil society and digital rights advocates due to overbroad provisions that facilitate government surveillance. According to Freedom House, Zambia is rated "Partly Free" in its *Freedom on the Net* index, citing politically motivated internet disruptions and surveillance practices. Additionally, evidence from CIPESA (2024) confirms that weak protections for digital privacy and the criminalisation of online expression disproportionately affect civil society organisations and marginalised groups. These systemic limitations underpin the low score for this principle.

6.1 | Digital Rights and Freedoms

The legal framework such as the Cyber Security Act, 2025 and Cyber Crimes Act, 2025 have raised concerns over surveillance and self-censorship among activists and journalists. The laws have been criticized by civil society actors for lacking robust human rights safeguards, enabling broad and unchecked surveillance powers, concentrating authority without independent oversight, and disregarding privacy protections—raising serious concerns about their potential to suppress dissent and undermine civil society's digital freedoms. However, there is no recent record of government-enforced internet shutdowns or systematic censorship of political content between 2024–2025. The most notable instance of digital disruption occurred during the 2021 general elections, when access to platforms like Facebook and WhatsApp was temporarily restricted.

Surveillance remains a concern, particularly in how broadly cyber laws are interpreted. However, comprehensive or routine monitoring of online political content has not been substantiated by recent reports. Similarly, while there have been past arrests for online criticism, such as those documented by Amnesty International and CIPESA, there is no recent pattern of detentions or prosecutions specifically for online dissent in the 2023–2025 period.

These findings support a moderate score as the legal framework poses risks, but enforcement has not escalated to severe repression. Civic voices remain active online, and social media platforms are widely used for advocacy and discourse, though some self-censorship persists.

6.2 | Digital Security and Privacy

Zambia has made commendable strides in strengthening its digital governance framework, notably through the enactment of the Data Protection Act (2021) and the Cyber Security and Cyber Crimes Act (2021). These laws reflect a growing institutional commitment to regulating digital spaces and protecting personal data. The country's improved performance in the ITU's 2024 Global Cybersecurity Index, rising from 68.8% in 2018 to 92.6% in 2024, places Zambia well above the global average and signals enhanced technical capacity and policy readiness.

However, this progress must be viewed alongside persistent challenges that shape the enabling environment for civil society. Enforcement of digital laws remains uneven, and key provisions lack clarity—particularly around the protection of civil liberties. While CSOs are legally permitted to operate online, politically sensitive periods often trigger spikes in digital threats, harassment, and intimidation. These incidents, though sporadic, contribute to a climate of caution where many organisations self-censor or avoid online activism to mitigate risk.

Zambia passed the Data Protection Act in 2021, which provides a legal framework for personal data protection. However, implementation remains limited, and oversight bodies like the Data Protection Office are not fully operational or independent. The Cyber Security and Cyber Crimes Act, while intended to address digital threats, contains broad and vague provisions that can be misused to erode digital security.

Importantly, while there is no public evidence of systematic government use of spyware or malware against CSOs, the perceived threat of surveillance has a chilling effect on digital engagement.

In sum, Zambia's digital infrastructure is advancing, but without robust safeguards for freedom of expression and protection from undue surveillance, civil society actors remain exposed. A rights-based approach to digital governance is essential to ensure that progress in cybersecurity translates into a truly enabling civic space.

6.3 | Digital Accessibility

Zambia has made notable strides in expanding digital infrastructure and policy frameworks, yet persistent disparities in internet access and digital capacity continue to shape—and constrain—the civic space. The divergence in reported internet penetration rates underscores this complexity: while DataReportal estimated usage at 33% in early 2025 based on active users, the 2024 ZICTA ICT Survey cited a national penetration rate of 67.3%, with urban centres like Lusaka driving higher connectivity. This discrepancy reflects not only methodological differences but also a deeper urban-rural digital divide with tangible consequences for civil society organisations (CSOs).

For CSOs operating in under-served regions, limited infrastructure, unreliable electricity, and low digital literacy remain formidable barriers. These constraints hinder access to online platforms essential for advocacy, citizen engagement, and service delivery. Grassroots groups, particularly in rural areas, often struggle to participate in digital campaigns or access real-time information, reinforcing structural inequalities in civic visibility and voice.

Digital capacity within civil society is moderately developed but uneven. According to UNESCO's 2021 Digital Literacy Country Report, only 35% of Zambians aged 15–65 possess foundational ICT skills. A 2022 ZCSD assessment found that over 60% of surveyed CSOs lacked dedicated ICT personnel or digital strategies, limiting their ability to engage in virtual consultations, data-driven advocacy, and online service provision. These gaps not only reduce

operational efficiency but also weaken CSOs' ability to respond to emerging threats and opportunities in the digital space.

Encouragingly, mobile device ownership and social media use are on the rise, and government initiatives such as the Smart Zambia Institute and the Digital Transformation Strategy (2023–2026) aim to improve access and digital skills. However, their impact remains concentrated in urban areas, with limited reach into rural communities where support is most needed. Without deliberate efforts to decentralise these programmes, existing divides may deepen.

Engagement with emerging technologies like artificial intelligence (AI) remains nascent. Zambia's National AI Strategy (2024–2026) is a promising step toward future-readiness, but uptake among CSOs is minimal. Interviews by ZIPAR in 2023 revealed that only 3 out of 15 urban-based NGOs had experimented with AI platforms, while rural-based organisations reported little understanding or access. Without targeted funding, capacity-building, and inclusive design, AI risks becoming another frontier of exclusion—further marginalising civil society actors from digital governance and innovation.

In sum, Zambia's digital landscape is evolving, but its benefits are unevenly distributed. For civil society to thrive in this environment, digital inclusion must be treated not just as a technical goal but as a civic imperative—anchored in equity, participation, and rights-based governance.

C) Recommendations

Despite constitutional guarantees, civil society in Zambia continues to operate within a constrained legal and regulatory environment marked by outdated legislation, inconsistent enforcement, and limited digital protections. The challenges identified—ranging from restrictive laws and opaque governance to digital exclusion and shrinking civic participation—require coordinated, multi-stakeholder responses. The following recommendations are tailored to address these systemic barriers and advance an enabling environment for civil society, grounded in international human rights standards and inclusive development principles.

1. Ministry of Justice & Ministry of Community Development and Social Services

- Expedite the amendment of the NGO Bill to align with constitutional rights and international norms, ensuring it facilitates rather than restricts civil society operations.
- Harmonise CSO registration laws and simplify procedures to reduce administrative burdens, particularly for grassroots, youth-led, and women-led organisations.
- In the aftermath of the shelving of Bill No. 7, it is imperative that government commits to a transparent, comprehensive, and inclusive constitution-making process led by citizens and for the citizens. This process should move away from the practice of piecemeal amendments and instead adopt a holistic approach that addresses the full spectrum of constitutional reforms required to safeguard democratic governance. A credible constitutional reform roadmap should include:
    - ✓ Timely publication of draft bills to facilitate openness and scrutiny by all stakeholders.
    - ✓ Inclusive and nationwide sensitizations public hearings to ensure broad-based participation.

- ✓ Structured consultation and collaborative mechanisms that deliberately engage government, civil society, traditional leaders, and marginalised groups.
- ✓ Integration of stakeholder feedback into final proposals to guarantee legitimacy and public ownership.

Such an approach will not only enhance transparency and accountability but also reinforce the credibility of constitutional reform, ensuring it reflects the aspirations of all Zambians.

2. Ministry of Information and Media

- Operationalise the Access to Information (ATI) Act by developing clear implementation guidelines, enhancing institutional capacity, and training public officials to ensure timely and equitable access to public data.
- Institutionalise proactive transparency by publishing public records, budget allocations, and service delivery data in accessible formats and local languages.

3. Ministry of Home Affairs and Internal Security

- Repeal or reform the Public Order Act to ensure full alignment with constitutional protections for freedom of assembly, association, and expression.
- Train law enforcement officers in rights-based approaches to civic participation, emphasising impartiality and non-violence in managing protests and public gatherings.

4. Ministry of Technology and Science & ZICTA

- Review and amend the Cyber Security and Cyber Crimes Act to include explicit safeguards for online freedom of expression, privacy, and protection from state overreach.
- Develop a national strategy for digital inclusion and rights, with provisions for affordable access, digital literacy, and protection from surveillance and cyber threats.

5. Donors and International Stakeholders

- Increase multi-year, flexible core funding to CSOs, prioritising those led by youth, women, and marginalised communities to enhance sustainability and local ownership.
- Support capacity-building initiatives focused on digital safety, legal compliance, strategic advocacy, and organisational resilience.
- Strengthen locally rooted civil society coalitions that promote civic education, accountability, and policy dialogue, while using diplomatic channels to advocate for civic space and digital rights. In addition, with Bill No. 7 deferred, donors should invest in strengthening civil society's capacity to engage in constitutional reform through legal analysis, public education, and advocacy—ensuring future processes are inclusive, transparent, and rights-based.

6. Civil Society Organisations

- Enhance collaborative platforms to coordinate advocacy on legal, digital, and policy reforms, amplifying collective impact.

- In response to the deferral of Constitution Amendment Bill No. 7, civil society should establish a coordinated watchdog mechanism to track the reform process, demand access to draft amendments, and ensure meaningful participation in future consultations—avoiding the exclusion experienced during the passage of the Cyber Security Bills.

- Improve internal governance, financial transparency, and legal compliance to build credibility with communities, government, and funders.

- Invest in secure digital tools, cybersecurity training, and infrastructure to protect civic space and enable safe online activism.

- Prioritise inclusive engagement by actively involving youth, rural populations, women, and persons with disabilities in advocacy and service delivery.

- Innovate grassroots outreach strategies that avoid politicised perceptions, using culturally relevant and non-partisan methods to foster civic participation.

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 once a year convene a panel of representatives of civil society and experts. 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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