

Somalia Country Focus Report October 2025



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A) An 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 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 six 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

Somalia's civic space operates within a fragile and contested environment shaped by decades of armed conflict, state fragility, and ongoing political transitions. While the Federal Government of Somalia (FGS) and federal member states continue efforts to consolidate governance structures, the country remains burdened by <u>persistent insecurity</u>, political volatility, and deep-rooted social inequalities. These challenges have created a complex landscape for civil society organisations (CSOs), which often find themselves navigating between competing authorities and unpredictable political dynamics.

The federal system, though <u>constitutionally established</u>, is still evolving, with <u>unresolved power-sharing arrangements</u>, involvement of clan-based structures and frequent disputes over electoral processes and resource distribution. These tensions have limited inclusive civic participation and undermined the implementation of democratic rights enshrined in the <u>Provisional Constitution (2012)</u>. Insecurity, particularly due to the <u>presence of Al-Shabaab</u>, political violence, and recurrent terrorist attacks, remains a major constraint that limits the ability of CSOs and journalists to operate freely. In areas under Al-Shabaab militant control, civic activities are banned, public gatherings prohibited, and journalists face <u>threats of violence</u>. Even in government-controlled zones, the fear of attacks discourages public protests and civic organising, further shrinking the space for engagement.

Despite these constraints, Somalia's civil society remains vibrant and resilient. Many CSOs emerged during the state collapse of the 1990s, stepping in to fill gaps left by weakened institutions. Today, they continue to play critical roles in humanitarian response, peacebuilding, and advocacy, particularly in addressing crises such as drought, displacement, and flooding. However, the sector faces structural vulnerabilities, including heavy reliance on donor funding, legitimacy concerns among local communities, harassment of rights-based organisations, and fragmented coordination across regions due to varying registration requirements.

The media environment, while relatively open, is high-risk. Independent journalists provide essential platforms for civic debate but frequently <u>face censorship</u>, <u>intimidation</u>, <u>and violence</u>—especially when reporting on governance, corruption and human rights. Public discourse around CSOs is similarly constrained, with advocacy organisations often viewed with suspicion and accused of promoting foreign agendas, which undermines their credibility among both the public and government officials.

Somalia's digital transformation has introduced new opportunities for civic engagement. The rapid expansion of mobile money, private telecoms, and <u>internet access</u> has enabled CSOs to leverage digital tools for advocacy, coordination, and service delivery. Notably, Somalia has not experienced nationwide internet shutdowns, though platform-specific bans and harassment of online activists have occurred. While the adoption of the <u>Data Protection Act in 2023</u> marks progress, the absence of mature regulatory safeguards leaves civil society exposed to digital risks such as surveillance and data insecurity.

Overall, Somalia's civic space is marked by contradictions. Constitutional guarantees exist on paper, but enforcement is weak and civic actors operate under constant pressure from both state and non-state actors. However, civil society remains innovative and essential, yet continually challenged by insecurity, politicisation, and fragile legitimacy. This Country Focus

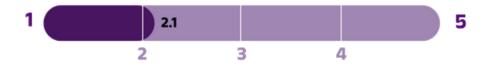
Report's assessment must be understood within this context—a setting where civil society is
indispensable, yet must navigate a landscape of persistent risk and uncertainty.

B) Assessment of the Enabling Environment

PRINCIPLE SCORE

1. Respect and Protection of Fundamental Freedoms

Score: 2.1/5 1



Somalia's <u>Provisional Constitution</u> provides a strong legal foundation for civil and political rights, including the freedom of association (Art. 16), freedom of expression (Art. 18), freedom of peaceful assembly (Art. 20), and the right to privacy (Art. 19). However, the practical reality diverges sharply from these guarantees. Enforcement is inconsistent, protection is weak, and violations are frequent. Civil society actors—including journalists, human rights defenders, and advocacy organisations—routinely face intimidation, harassment, and arbitrary restrictions. The <u>CIVICUS Monitor</u> currently rates Somalia's civic space as *repressed*, a reflection of the ongoing challenges such as political interference in associations, suppression of public demonstrations, and the targeting of independent media. These conditions underscore the gap between constitutional commitments and the lived experience of civil society actors on the ground.

1.1 | Freedom of Association

Freedom of association in Somalia is formally recognised under the <u>2019 NGO Law</u> and Article 16 of the <u>Provisional Constitution</u>, which provide legal grounds for CSOs to operate. However, the practical application of these rights remains uneven and fraught with challenges, undermined by weak institutional enforcement, political interference, and a volatile security

¹This is a rebased score derived from the <u>CIVICUS Monitor rating</u> published in December 2024.

<u>environment.</u> These factors combine to create a civic space where associations—particularly those engaged in governance, accountability, and human rights—are vulnerable to <u>arbitrary</u> restrictions and intimidation.

Recent cases illustrate the disconnect between legal guarantees and lived realities. For instance, trade unions such as the National Union of Somali Journalists (NUSOJ) have <u>faced repeated harassment</u>, especially during leadership transitions, with documented interference from state actors. Local NGOs, particularly those engaged in governance, accountability, or human rights, also report intimidation and undue pressure from officials. In addition, authorities have at times <u>suspended</u> or deregistered associations, often without transparent justification.

The state selectively enforces association rights, often privileging service-delivery NGOs while constraining advocacy groups. Panel reflections during the assessment identified this pattern. Participants noted that CSOs critical of government policy are disproportionately targeted, while those focused on humanitarian or development work encounter fewer obstacles. This distinction points to a politicised approach to civic engagement, where tolerance is conditional on alignment with state interests. Moreover, the absence of clear procedural safeguards for registration, suspension, or deregistration leaves associations exposed to discretionary decisions by authorities, further weakening their operational security.

The state's approach to civil society remains ambivalent—supportive in rhetoric but restrictive in practice—raising critical questions about the sustainability and independence of civic actors in the country.

1.2 | Freedom of Peaceful Assembly

Article 20 of Somalia's Provisional Constitution guarantees the right to peaceful assembly. However, this right remains severely constrained in practice by a combination of legal ambiguity, security concerns, and political control. While the Constitution affirms the right to protest without prior authorisation, in reality, public gatherings are subject to approval by district commissioners, and permits are frequently denied on vague security grounds. This discretionary approach reflects a broader pattern of state control over civic expression, where the exercise of assembly rights is treated as a political risk rather than a democratic entitlement. In addition, attacks perpetrated by the al-Shabaab and security forces make the exercise of the right to peaceful assembly more lethal.

Security forces <u>routinely disperse</u> protests with excessive force, often citing national security threats as justification for blanket bans—particularly in Mogadishu. The use of live ammunition against demonstrators has been <u>documented</u> in <u>multiple cases</u>. For example, on 29 March 2025, Somali police arrested journalists and dispersed women protesting against sexual violence.

Human rights organisations such as <u>Amnesty International</u> and <u>Human Rights Watch</u> have consistently reported intimidation of protesters, arbitrary arrests, and harassment of journalists covering demonstrations. Somalia's reliance on outdated laws, such as the 1963 Public Order Act, offers little protection or procedural clarity, leaving law enforcement with broad latitude to act without accountability. Moreover, in Somaliland, Article 8 ("Arrest of persons suspected of posing a danger to national security") and Article 9 ("Other powers of the National Security Committee") of the <u>Public Order and Security Law</u> grant security authorities expansive discretion to detain individuals and allow the security committee to intervene in broader security matters. These provisions are not constrained by clear oversight or procedural safeguards, enabling potential misuse of power.

Panelists engaged in this assessment highlighted that grassroots protests rarely proceed without interference. They noted that assemblies critical of government policy are particularly vulnerable, while gatherings organised by service-delivery NGOs or aligned actors face fewer restrictions. This selective tolerance underscores the politicisation of civic space, where the legitimacy of assembly is contingent on its perceived threat to state authority.

The suppression of peaceful assembly not only curtails public participation but also signals a broader erosion of democratic norms. In such an environment, civic actors must navigate not only legal uncertainty but also physical risk, undermining their ability to mobilise communities, advocate for change, or hold power to account. The state's failure to facilitate and protect peaceful assembly reflects a deeper governance challenge—one where constitutional rights exist in theory but are systematically denied in practice.

1.3 | Freedom of Expression

Freedom of expression in Somalia, though constitutionally enshrined under Article 18, remains one of the most precariously exercised rights in the country due to systemic repression, legal ambiguity, and targeted retaliation. Somalia continues to rank among the <u>most dangerous</u> countries for journalists, with media professionals facing <u>a spectrum of threats</u>—from arbitrary arrests and digital harassment to physical violence and institutional sabotage.

Recent incidents reveal the fragility of this right. In April 2024, Somali authorities <u>froze the bank accounts</u> of the Somali Journalists Syndicate (SJS), pursuant to a Banadir Regional Court ruling that cited alleged registration irregularities. However, rights groups <u>widely interpreted</u> the move as retaliation for SJS's vocal criticism of government policies and its <u>submission of a legal case</u> to the UN Human Rights Committee. This action not only disrupted the organisation's operations but also signaled a broader trend of weaponising judicial and financial systems to silence dissent.

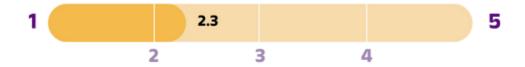
Somalia's 2016 Media Law, while intended to regulate the sector, has been criticised for granting excessive powers to the Ministry of Information, including the ability to suspend outlets and revoke licences without due process. Criminal defamation and anti-terrorism laws are routinely used to prosecute journalists, effectively criminalising investigative reporting and commentary on public affairs. NUSOJ have documented how these laws are applied selectively, often targeting those who expose corruption or criticise security forces.

Panellists confirmed that fear of reprisals has become a defining feature of Somalia's media landscape. Many journalists avoid reporting on sensitive topics such as political elites, security operations, or corruption. While some migrate to social media to maintain their voice, even these platforms are <u>increasingly monitored and manipulated</u>, narrowing the space for free expression. A repressive media environment not only stifles public discourse but also weakens accountability and transparency. When journalists are silenced, the broader civic ecosystem suffers, as access to information and the ability to mobilise public opinion are curtailed. Somalia's constitutional guarantees remain aspirational unless matched by institutional reforms, legal safeguards, and a genuine commitment to protecting those who speak truth to power.

PRINCIPLE SCORE

2. Supportive Legal and Regulatory Framework

Score: 2.33/5



This section explores the legal and regulatory framework shaping civil society in Somalia, focusing on registration, operational environment, and protection from interference. The findings reflect a mixed and uneven landscape: while legal recognition of CSOs exists, the process of registration remains burdensome, enforcement is inconsistent, and protections against interference are weak. These conditions create a fragmented environment where some organisations operate with relative stability, but grassroots and watchdog groups face significant barriers to entry and sustained engagement. The analysis highlights how these regulatory dynamics affect the ability of Somali civil society to function freely, securely, and effectively.

2.1 | Registration

Somalia's legal framework—anchored in the 2019 NGO Law and directives from the Ministry of Planning, Investment and Economic Development (MoPIED), formally recognises the right to establish civil society organisations. On paper, this framework is inclusive, allowing any person or entity, including marginalised groups, to register. However, in practice, the registration process is marked by significant administrative and financial barriers that disproportionately affect grassroots and community-based organisations. While donor-funded NGOs can navigate these requirements with relative ease, smaller initiatives often struggle to meet the costs and procedural demands. For instance, the Ministry of Interior mandates all NGOs to register under Article 54 of the Civil Law of Somalia No. 37 (1973), which requires submission of detailed documentation, including organisational charters and financial plans. Additionally, MoPIED's directives necessitate compliance with sector-specific regulations and project evaluations, further complicating the registration process for smaller entities.

Registration fees for CSOs in Somalia vary significantly across jurisdictions, creating a fragmented and inequitable regulatory landscape. At the federal level, the cost of <u>registering</u> a <u>local NGO</u> is approximately USD 500, with annual renewals at half that amount. Foreign

NGOs register through the Ministry of Foreign Affairs under similar terms. In contrast, regional governments impose different fee structures—Somaliland charges USD 110 (renewal USD 60), while Puntland requires USD 200 (renewal USD 100). In Jubaland, official sources state that local NGOs pay USD 500, while international NGOs pay up to USD 1,000 to register. These sums are steep given Somalia's economic context, placing smaller, grassroots NGOs at a distinct disadvantage. The disparities not only reflect a lack of harmonisation but also raise concerns about fairness and accessibility, particularly for grassroots organisations with limited financial capacity.

While these fees may be manageable for donor-funded or internationally supported entities, they pose a substantial barrier for community-based groups, especially those representing marginalised populations. The financial burden discourages formal registration, limiting the visibility and legitimacy of smaller initiatives and reinforcing a civic space dominated by well-resourced actors.

Beyond financial hurdles, the registration process is often opaque and bureaucratically complex. The existence of <u>parallel licensing systems</u>—where local governments also require separate approvals—adds another layer of complexity. This multi-tiered structure increases administrative overheads and opens the door to discretionary enforcement, often influenced by political or personal interests.

Panellists noted that while the legal framework itself is not problematic, the implementation is riddled with unclear procedures and inconsistent requirements. In South/Central Somalia, the absence of a unified NGO law forces CSOs to engage with multiple ministries and local authorities, increasing the risk of delays and arbitrary decisions. In Somaliland and Puntland, registration requires a minimum number of citizens or residents to register, and no formal appeal mechanisms exist if an application is denied. Reapplication is only permitted after a year, further limiting access and accountability. These inconsistent registration requirements and fees create a patchwork of regulatory environments that hinder national coordination among CSOs. Although a new draft NGO bill approved by Cabinet March 2024 proposes a 90-day registration decision period and a 30-day judicial appeal, this is not yet enacted. This fragmentation not only limits the reach of civil society but also reinforces the perception that associations are subject to political manipulation rather than protected by law. The broader context of the weak rule of law and fragmented governance exacerbates these vulnerabilities.

These structural issues have broader implications for the enabling environment for civil society. Without a standardised, transparent, and affordable registration process, the legal right to associate becomes conditional rather than universal. Panel reflections emphasised that high costs and bureaucratic hurdles discourage small, community-led initiatives, reinforcing a civic space dominated by well-resourced actors and limiting the representation of diverse voices. This risks excluding the very voices that civil society mechanisms are meant to empower, undermining both civic diversity and democratic participation. Without reforms to improve affordability, clarity, and appeal mechanisms, the civic landscape will continue to reflect structural inequities rather than democratic inclusivity.

2.2 | Operational Environment

Somalia's legal framework, particularly the 2019 NGO Law and directives from the MoPIED, outlines the operational rights of CSOs. Under Article 9 of the 2019 NGO Law, organisations are required to register with the Ministry and obtain annual reauthorisation, creating recurring administrative burdens. This article further mandates that NGOs submit periodic activity and financial reports to the Ministry, granting authorities wide discretion to suspend or deregister organisations for non-compliance—often without transparent appeal mechanisms

The extent to which CSOs can autonomously determine their internal governance, objectives, and activities remains constrained by inconsistent enforcement, annual re-registration requirements, multiple layers of administrative oversight and informal political dynamics. While

the law does not explicitly require government pre-approval for day-to-day operations, in practice, CSOs often face informal pressures and selective scrutiny—especially when engaging in advocacy or governance-related work. The freezing of the bank accounts of the Somali Journalists Syndicate (SJS) in April 2024, following a Banadir Regional Court order citing "registration irregularities" and "security concerns", illustrates how legal provisions intended for oversight can be invoked to constrain associations under the pretext of national security and regulatory compliance. Rights groups argued that this action represented a selective application of the law to pressure critical voices rather than a neutral enforcement measure.

Administrative oversight is uneven and frequently shaped by patronage networks. Larger, donor-funded NGOs tend to enjoy smoother relations with government institutions and easier access to decision-makers, while smaller, community-based organisations are often sidelined. Panellists noted that despite legal recognition, these smaller CSOs encounter bureaucratic hurdles that limit their influence and visibility. Reporting requirements, while not excessive on paper, are applied inconsistently and can become burdensome when used as tools of control or delay.

Somalia lacks a robust domestic philanthropic culture or private sector support, leaving most CSOs heavily dependent on international donors. This donor dependency sustains the sector but also weakens local ownership and accountability, as programming priorities may be shaped more by external agendas than community needs. In Puntland (Puntland NGO Act, 2016, Sec. 26) and Somaliland (Somaliland NGO Law, 2010, Sec. 6), NGOs are restricted from engaging in commercial activities, but the laws do not clearly define the scope of prohibited income-generating activities. These ambiguities limit NGOs' ability to diversify funding and achieve financial sustainability, reinforcing a landscape where influence is concentrated among well-connected actors, and grassroots voices struggle to be heard.

These restrictions aim to maintain the non-profit nature of NGOs and prevent misuse of resources. However, similar to Puntland, the lack of detailed definitions regarding "commercial purposes" can create uncertainty for NGOs seeking to engage in income-generating activities to support their operations. The ambiguity surrounding what constitutes "commercial activities" in both regions underscores the need for clearer guidelines to enable NGOs to pursue sustainable funding strategies without compromising their non-profit status.

2.3 | Protection from Interference

Somalia's constitutional guarantee of freedom of association (Art. 16) offers a foundational right for CSOs, but in practice, the legal framework lacks effective protections against arbitrary interference by both state and non-state actors. Authorities retain broad discretionary powers to suspend, dissolve, or obstruct CSOs, often without due process or clearly defined legal grounds. In both <u>Somaliland Public Order & Security Law</u> (Art. 36 – Dissolution of Associations) and the Somalia Public Order Law (Art. 61), the Public Order Committee/security authorities are empowered to request a court order to dissolve an association on grounds of "national security" within a prescribed period (commonly three months). The court may first issue a warning and, if the association does not comply with directives, proceed with dissolution. Although the law formally provides a right to appeal, the broad security-based grounds and absence of clear criteria grant authorities significant discretionary power. This judicial involvement provides only "minimal protection" against arbitrary dissolution.

In 2024, Somali authorities froze the bank accounts of the Somali Journalists Syndicate (SJS) without explanation—widely interpreted as retaliation for its criticism of government policy. Such actions bypass judicial oversight and reflect a broader pattern of informal repression.

Human rights organisations and independent media outlets frequently report harassment, intimidation, and arbitrary detention, contributing to a climate of fear and self-censorship. These <u>incidents</u> are not isolated but systemic, pointing to a governance culture where dissent is penalised rather than protected.

In practice, NGOs often implement programmes in coordination with government authorities, particularly in high-risk areas where they may require police escorts. These escorts frequently come with formal or informal "cost-recovery" requirements. Such operational reliance on security actors can compromise NGOs' autonomy and heighten their exposure to risk. Together, the practice of escort-related costs and the broad public-order powers held by state actors impose practical constraints on the independence of civil society organisations, creating opportunities for administrative control, operational delays, and politically motivated interference.

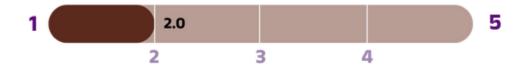
The legal framework does not adequately regulate state inspections or interventions in a way that prevents abuse. In the absence of standardised procedures, inspections can serve as tools of control or surveillance, particularly targeting rights-based organisations. Panellists confirmed that CSOs engaged in advocacy or critical reporting are most at risk, while service-delivery NGOs tend to operate with fewer constraints. This selective enforcement reinforces a tiered civic space, where operational freedom is contingent on political alignment or neutrality.

Without legal safeguards against arbitrary interference, CSOs operate in a precarious environment where their existence and activities can be curtailed at any moment. This not only weakens institutional resilience but also discourages civic participation, particularly among marginalised groups. Strengthening legal protections, clarifying grounds for dissolution, and establishing independent appeal mechanisms are essential steps toward ensuring a more secure and enabling environment for civil society in Somalia.

PRINCIPLE SCORE

3. Accessible and Sustainable Resources

Score: 2.0/5



This section examines the state of resource access for civil society actors in Somalia through the lenses of availability, effectiveness, and sustainability. Findings reflect a resource environment that is not only scarce and unevenly distributed but also structurally unstable. Grassroots organisations face the greatest barriers, while donor-driven funding models constrain the autonomy and impact of CSOs. Sustainability is further undermined by heavy reliance on external aid and the absence of diversified, long-term support. The analysis that follows highlights how these dynamics affect civil society's ability to operate, adapt, and contribute meaningfully to Somalia's development, underscoring the urgent need for more flexible, locally anchored financing mechanisms.

3.1 | Accessibility of Resources

Access to resources for civil society actors in Somalia remains severely constrained, with implications that go beyond financial instability to affect the very nature and effectiveness of their work. While international donors continue to be the dominant source of funding, their support is <u>largely short-term and project-specific</u>, leaving CSOs without core funding or the flexibility to pursue long-term community-driven goals. This <u>donor dependency</u> has created a landscape where larger, well-networked NGOs are prioritised, while grassroots and community-based organisations—often working on sensitive issues or with marginalised groups—struggle to survive.

Government <u>regulations and complex compliance</u> requirements further exacerbate these challenges. High registration and renewal fees, coupled with bureaucratic hurdles and political interference, restrict access to funding and discourage smaller organisations from formalising their operations. The absence of tax exemptions or incentives for donations to CSOs reflects a broader lack of institutional support, with tax burdens such as income tax on grants and double taxation undermining financial viability. In a context of widespread poverty and weak

institutional frameworks, the absence of supportive tax policies effectively closes off domestic funding streams, leaving CSOs almost entirely reliant on external donors.

Information asymmetry also plays a critical role in limiting access to funding. Many CSOs lack timely and reliable access to information about funding opportunities, and even when such information is available, they often do not possess the technical capacity to respond effectively. Funding proposal structures tend to be complex and donor-centric, requiring advanced skills in grant writing and strategic alignment that many local organisations do not have. This creates a cycle of exclusion where only a few well-connected CSOs consistently secure funding, while the majority remain under-resourced and unable to scale their impact. The lack of capacity-building initiatives exacerbates this divide, reinforcing dependency and limiting the diversity of voices in civil society.

Moreover, CSOs face significant difficulties in accessing banking services, including restrictions on opening accounts and fears of surveillance or intimidation through financial data. These constraints are particularly acute for organisations addressing politically sensitive topics, where financial systems can be weaponised to stifle dissent. Compounding these issues is the limited capacity of many CSOs to respond to funding opportunities. Smaller organisations often lack the skills, infrastructure, and access to information needed to write competitive proposals, and funding calls are frequently structured in ways that align with donor priorities rather than local needs. This misalignment reinforces a cycle of dependency and marginalisation, where only a few well-connected actors thrive while the majority remain under-resourced and excluded from national discourse. In sum, the state of resource accessibility for Somali CSOs is not merely a logistical challenge but a structural barrier that shapes who gets to participate in civil society and whose voices are heard.

3.2 | Effectiveness of Resources

Donor funding remains a critical lifeline for Somali civil society actors, yet its effectiveness is shaped by a complex set of conditions that often limit autonomy and responsiveness. While donors generally maintain positive relationships with CSOs—particularly with media and women-led organisations—and provide support without overt discrimination, the funding they offer is frequently accompanied by stringent conditions. These include requirements for financial accountability, detailed reporting, and adherence to safeguarding standards. Although these conditions are designed to ensure transparency and prevent misuse, they also impose administrative burdens that disproportionately affect smaller organisations with limited capacity. Importantly, the Somali government has not imposed consistent restrictions on how funds are used, but bureaucratic inefficiencies and unclear legal frameworks still hinder the smooth flow and utilisation of resources.

Despite donor claims of alignment with local priorities, funding remains largely donor-driven. CSOs often find themselves reshaping their missions to fit donor agendas, which tend to emphasise governance, peacebuilding, and gender equity. While these are important areas, the prioritisation of donor interests sometimes sidelines urgent community needs and reduces the relevance of CSO interventions. This dynamic fosters a dependency model where CSOs operate more as implementers of external agendas than as autonomous actors responding to local realities. The Heritage Institute's 2023 report underscores this trend, noting that donor-driven funding has become a defining feature of Somali civil society, constraining innovation and long-term strategic planning.

Flexibility in donor funding varies significantly. Some donors demonstrate adaptability by allowing mid-project adjustments in response to shifting operational environments, such as humanitarian emergencies or security threats. However, many funding mechanisms remain rigid, with fixed programme designs and limited scope for modification. This rigidity undermines the effectiveness of CSOs, particularly in volatile contexts where needs evolve

rapidly. Short project cycles and inflexible grant structures further weaken impact, as CSOs are unable to pivot or scale interventions in response to emerging challenges. Moreover, compliance demands often exceed the scale of funding provided, consuming valuable staff time and resources that could otherwise be directed toward programme delivery.

Donor responsiveness to security concerns is uneven. While some funders acknowledge the risks faced by CSOs—especially those working in conflict-affected or politically sensitive areas—there is limited evidence of systematic efforts to mitigate harm. Panel discussions reveal that international NGOs, often acting as intermediaries, subcontract Somali CSOs with constrained budgets and influence, reducing local ownership and the ability to shape programmatic decisions. This intermediary model further distances donors from the realities on the ground, weakening their capacity to respond to security threats or operational disruptions.

Nonetheless, there are promising examples of effective, context-sensitive funding. Initiatives like <u>Bilan Media</u>, which receive flexible and sustained support, illustrate how donor responsiveness and long-term investment can empower local actors to lead transformative change. These cases highlight the potential for donor funding to be both effective and empowering—if designed with greater flexibility, alignment with local priorities, and sensitivity to the operational realities of Somali CSOs.

3.3 | Sustainability

The sustainability of resources accessed by civil society actors in Somalia is undermined by a narrow and unreliable funding base, dominated by short-term, project-based donor grants. Most CSOs lack access to a diverse pool of funding sources, making them highly vulnerable to shifts in donor priorities and global aid trends. This dependency creates structural fragility—when a donor withdraws or a project ends, organisations often face abrupt programme closures, staff layoffs, and loss of institutional memory. Such disruptions not only affect internal continuity but also erode trust with communities, weakening the long-term impact of civil society work.

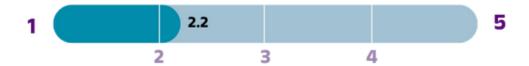
Funding cycles are often fragmented, with significant gaps between grant periods. These interruptions stall operations and force CSOs into reactive modes of functioning, rather than strategic planning. Staff contracts are typically tied to project timelines, resulting in job insecurity and high turnover, which further undermines organizational capacity. The lack of core funding means CSOs cannot invest in institutional development, retain skilled personnel, or build reserves to buffer against funding delays. Instead, they operate in survival mode, focused on meeting donor requirements rather than pursuing long-term goals.

The dominance of project-based funding also limits CSOs' ability to engage in strategic programming. With little flexibility to define their own priorities, organisations are often compelled to align with donor agendas, which may not reflect the most pressing local needs. This misalignment stifles innovation and reduces the relevance of interventions. Moreover, the absence of support for income-generating activities or local fundraising initiatives means CSOs struggle to build self-reliance. The philanthropic culture remains weak, and private sector engagement is minimal, leaving few alternatives to external aid. Without structural reforms to diversify funding and strengthen local support systems, Somali CSOs will continue to face chronic instability and limited sustainability.

PRINCIPLE SCORE

4. Open and Responsive State

Score: 2.2/5



This section assesses the Somali government's openness, transparency, and accountability toward civil society actors, focusing on how CSOs are engaged, informed, and recognised in governance processes. Research findings reflect a system where formal commitments to openness exist but are weakly implemented. While civil society is occasionally consulted, participation is often symbolic, with limited influence over decisions. Transparency remains minimal, as public institutions rarely publish timely or accessible information, and accountability mechanisms are largely absent. CSOs operate on unequal terms, with little feedback on how their input is used and no structured avenues to hold the government accountable. These conditions undermine trust, discourage sustained engagement, and weaken civil society's role in shaping public policy.

4.1. | Transparency

Somalia's legal framework nominally recognises the right to access public information, as enshrined in Article 32 of the Provisional Constitution. However, in practice, this right remains largely aspirational due to the absence of a comprehensive and enforceable Right to Information (RTI) law. The 2024 Official Information Bill, currently under parliamentary review, has sparked widespread concern among civil society and media groups for its vague definitions, broad exemptions, and lack of safeguards against unjustified denial of access.

While the bill includes provisions for proactive disclosure and timelines for appeals, <u>critics</u> <u>argue</u> that it fails to meet international standards and risks entrenching a culture of secrecy within public institutions. Public institutions are not consistently required to publish decision-making information such as draft laws, budgets, or audit reports in accessible formats or on digital platforms. At the local level, transparency is even weaker, with citizens and CSOs often relying on informal networks to obtain basic government data. There are no clear, simple, or standardised procedures for filing access to information requests, nor are there fee waivers

for vulnerable groups. The lack of a dedicated oversight body—such as an independent information commission—further undermines accountability, as there are limited avenues for appeal or sanctions in cases of non-compliance.

The proposed bill's development process, conducted without public consultation, has also <u>drawn criticism</u> for its opacity and exclusion of key stakeholders. This undermines its legitimacy and raises concerns about its potential misuse to shield government activities from scrutiny. In <u>regions under Al-Shabaab control</u>, access to information is virtually nonexistent, further restricting civic oversight and transparency.

Overall, while Somalia has taken steps toward formalising access to information, the current legal and institutional framework remains inadequate, leaving civil society actors without reliable tools to monitor governance, hold public institutions accountable and engage meaningfully in public decision-making.

4.2 | Participation

There is documented evidence of CSO consultation in national processes. For instance, CIVICUS Monitor <u>reports</u> that Somali CSOs have contributed to the ongoing constitutional review process by providing analysis and facilitating dialogue between political actors and civil society platforms. However, the extent of participation in governance and decision-making processes in Somalia remains limited, fragmented, and often symbolic. While policy documents reference participatory approaches, actual engagement is inconsistent and largely reserved for high-level forums, such as those on elections or constitutional review. Even in these spaces, grassroots organisations, youth groups, and women-led CSOs are underrepresented.

Platforms such as the <u>Somali Dialogue Platform, implemented</u> by the <u>Rift Valley Institute</u>, have sought to facilitate consensus among political stakeholders and civil society actors on contentious governance issues. However, such initiatives are not always inclusive, with participation often limited to established CSO networks based in Mogadishu, while grassroots, youth-led and women-led organisations remain underrepresented. CSOs critical of government policies or lacking donor backing are often excluded from consultations, while larger, donor-aligned organisations dominate sectoral dialogues. Opportunities for engagement are mostly confined to local or project-level initiatives, particularly where international actors are involved. Federal and regional authorities seldom incorporate CSO input into broader policy design. Moreover, participation formats—whether online or inperson—are not consistently accessible, especially for rural or resource-constrained groups.

In June 2025, the President of Somalia inaugurated a <u>National Consultative Forum</u> that explicitly invited civil society representatives, scholars, former officials and political leaders to contribute to national discussions on constitutional completion, democratisation, security and national unity. While this marked a positive step toward <u>inclusivity</u>, the extent to which civil society feedback will shape final political outcomes remains uncertain. Consultations are often called at short notice, and feedback from CSOs is rarely incorporated into final policy texts, reinforcing concerns that participation remains largely procedural rather than transformative. This undermines trust and reinforces perceptions that participation is a formality rather than a genuine opportunity to influence policy.

The lack of early-stage involvement and the superficial nature of consultations diminish civil society's ability to shape governance meaningfully. A clear illustration is the 2024 Official Information Bill, which advanced to parliamentary review without structured public consultation or formal CSO hearings, a concern publicly raised by media unions and civil society actors. In sectors like women's empowerment and humanitarian response, CSOs have slightly more

influence due to specialised expertise and donor leverage. However, in critical areas such as public finance, security, and governance, their role remains marginal. This limited and uneven participation not only weakens civil society's policy influence but also discourages sustained engagement, as many actors feel their contributions are undervalued or ignored.

4.3 | Accountability

Government accountability to civil society actors in Somalia is severely constrained by a lack of institutional mechanisms for feedback, transparency, and follow-up. Although the Constitution (Article 33) guarantees just administrative action, this principle is not reflected in practice. CSOs rarely receive detailed responses explaining how their input has been considered in decision-making processes. There is no legal obligation for public institutions to publish consultation outcomes or provide rationales for accepting or rejecting civil society recommendations. As a result, engagement with CSOs often feels performative, with little evidence that their contributions influence final decisions. This absence of transparency erodes trust and discourages meaningful participation.

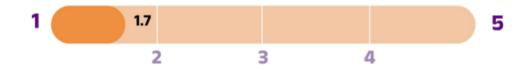
Moreover, when government decisions negatively affect CSOs—such as licence denials, funding blocks, or suspension of activities—there are no clear administrative appeal procedures. Judicial oversight is weak and often politicised, leaving CSOs without effective remedies. There are no formal spaces where civil society can monitor how their input is used or hold officials accountable for disregarding it. Public accountability mechanisms such as town halls, parliamentary hearings, or formal reporting sessions are largely absent. This institutional vacuum means that CSOs operate in an environment where their voice is not only undervalued but also structurally excluded from governance processes.

The impact of this weak accountability framework is that civil society actors are discouraged from sustained engagement, knowing that their input is unlikely to be acknowledged or acted upon. This undermines their ability to advocate for reforms, contribute to policy development, or represent community interests effectively. It also affects donor confidence, as transparent and accountable governance is a key condition for sustainable support. Without institutionalised feedback loops and accountability channels, the relationship between the Somali government and civil society remains imbalanced, limiting the potential for collaborative and inclusive governance.

PRINCIPLE SCORE

5. Supportive Public Culture and Discourses on Civil Society

Score: 1.67/5



This section examines the state of supportive public culture and discourse on civil society in Somalia, based on three key dimensions: public discourse and constructive dialogue; perception of civil society and civic engagement; and civic equality and inclusion. The assessment reveals a civic environment marked by deep mistrust, fear, and exclusion, as reflected in the low scores across these dimensions. Although legal provisions for expression and participation exist, they are frequently undermined by elite-controlled narratives, limited grassroots legitimacy, and the absence of inclusive platforms. Strengthening Somalia's civic culture will require long-term investment in civic literacy, protection of civic actors, and the promotion of inclusive and constructive public dialogue.

5.1 | Public Discourse and Constructive Dialogue on Civil Society

Public discourse on civil society in Somalia is shaped by a fragile and often contradictory political rhetoric and narratives, where recognition of civil society actors is partial and conditional. While CSOs are acknowledged for their humanitarian and service delivery roles, their engagement in governance, rights advocacy, and accountability is frequently met with suspicion or hostility. Political leaders have, at times, publicly dismissed CSOs as irrelevant or disruptive, framing them as foreign-controlled or aligned with opposition agendas. Such narratives, including high-profile instances where CSOs were labelled on national radio as unpatriotic for raising electoral concerns, have a chilling effect on public debate and diminish the legitimacy of civil society actors in the eyes of both the state and the public.

This delegitimisation is compounded by the media's inconsistent portrayal of CSOs. Although some outlets occasionally highlight their contributions, coverage is often superficial and sporadic. State-owned media tend to reinforce government narratives, portraying dissent as a threat and rarely offering space for evidence-based civic dialogue. In contrast, independent media remain underdeveloped and constrained by political and security pressures. The result

is a public discourse that rarely fosters trust or appreciation for CSOs, instead amplifying skepticism and exclusion. Hostile <u>propaganda from non-state actors</u> such as Al-Shabaab further exacerbates this dynamic, portraying CSOs as anti-Islamic or foreign agents, which not only undermines their credibility but also deters grassroots engagement due to fear of reprisals.

The lack of respectful, inclusive, and evidence-based dialogue marginalises CSOs from political and societal debates, weakening their role as agents of accountability and social cohesion. Without sustained public recognition and meaningful engagement, civil society actors struggle to build legitimacy, mobilise communities, or influence governance. Addressing these challenges requires a deliberate shift in public culture—one that protects civic actors, promotes constructive dialogue, and invests in civic literacy and inclusive media narratives.

5.2 | Perception of Civil Society and Civic Engagement

In Somalia, public perception of civil society remains weak and <u>fragmented</u>, shaped by a combination of structural exclusion, limited civic education, and a widespread sense of political disempowerment. Many citizens view CSOs as donor-driven and urban-centric, disconnected from the realities of everyday life, particularly in rural and conflict-affected areas. While CSOs are known to exist, they are not widely seen as accountable to communities or responsive to local priorities. This disconnect fosters skepticism, with citizens often perceiving CSOs as vehicles for <u>external agendas</u> rather than as legitimate actors representing public interests.

A study published in the <u>Open Journal of Social Sciences</u> explores the role of civil society in state-building in Somalia. The study found that a significant majority (85%) of respondents believed that civil society organisations have a crucial role in promoting democratic governance and accountability in Somalia. However, the study also identified challenges such as legal restrictions and limited funding that hinder the effectiveness of civil society organisations.

The broader civic environment is marked by a deep sense of powerlessness. Citizens generally feel they have little or <u>no influence</u> over political decisions, even in areas where local councils or community forums are present. Participation in civic or political processes is low, not due to apathy, but because individuals believe their voices carry no weight. This perception is reinforced by the limited visibility of CSOs in public life and the absence of mechanisms that translate citizen input into policy outcomes. Although some individuals demonstrate political awareness and capacity in informal discussions, this rarely translates into meaningful engagement or influence, highlighting a disconnect between civic knowledge and political agency.

Civic education is virtually absent from <u>formal and informal institutions</u>. Schools and community programmes rarely provide comprehensive education on political rights, responsibilities, or the value of civic engagement. As a result, many Somalis lack the foundational understanding needed to participate effectively in civic life. This gap is particularly acute <u>among youth, women, and minority clans</u>, who face additional cultural and structural barriers to <u>inclusion</u>. Even initiatives such as parliamentary gender quotas are perceived as symbolic, lacking the institutional support or cultural shift necessary to enable genuine participation.

Together, these dynamics create an environment in which civil society struggles to gain public legitimacy and mobilise citizen engagement. The lack of civic education, combined with entrenched perceptions of powerlessness and exclusion, severely limits the ability of CSOs to build grassroots support or influence political processes. Without deliberate efforts to expand civic literacy, foster inclusive participation, and strengthen the connection between CSOs and

communities, civil society in Somalia will remain peripheral to national development and democratic governance.

5.3 | Civic Equality and Inclusion

Efforts to promote civic inclusion in Somalia have gained some visibility in recent years, yet they remain limited in scope and impact, particularly for marginalised groups. Legal frameworks, such as article 11 of the Provisional Constitution, provide formal guarantees of equality and participation, but these are not consistently translated into practice. Social and economic systems continue to present significant barriers for women, youth, minority clans, and other underserved populations, whose access to civic processes is often constrained by entrenched norms, insecurity, and resource disparities. While initiatives like the National Consultative Forum inaugurated in June 2025 signal a willingness to engage civil society in high-level dialogue, such efforts are largely symbolic and episodic, lacking the institutional depth needed to ensure sustained and equitable participation. The selective nature of these engagements reflects broader patterns of exclusion. Although civil society representatives were invited to contribute to discussions on constitutional reform and national unity, participation was dominated by elite actors, and opportunities for grassroots involvement remained scarce. This reinforces a civic culture where inclusion is performative rather than transformative, and where marginalised voices are acknowledged but not empowered. The absence of routine, structured mechanisms for civic input means that even when CSOs are present, their influence is limited and unevenly distributed.

Social tolerance and respect for diversity also remain fragile. While some government actors have shown openness to dialogue, societal attitudes toward marginalised groups often reflect deep-seated biases. Without deliberate efforts to challenge these norms and expand civic space, the potential for inclusive engagement remains constrained. Economic disparities further compound exclusion, as many individuals lack the resources or platforms to participate meaningfully in civic life. In this context, civil society operates in an environment where legal recognition does not guarantee access, and where social and economic barriers continue to undermine the promise of equal participation.

PRINCIPLE SCORE

6. Access to a Secure Digital Environment

Score: 3.0/5



This section explores the evolving digital landscape in Somalia through three interconnected lenses: Digital Rights and Freedoms, Digital Security and Privacy, and Digital Access and Inclusion. It examines how expanding internet penetration and mobile connectivity have enabled civil society actors to engage more effectively with communities, while also highlighting persistent gaps in digital literacy and equitable access. The analysis further considers the vulnerabilities faced by CSOs and citizens in a context of limited data protection and surveillance risks, and assesses the extent to which legal and institutional frameworks uphold digital rights. Together, these sections reveal that Somalia's digital landscape reflects growing connectivity and infrastructure improvements, but persistent gaps in digital literacy, weak protections for privacy, and limited enforcement of digital rights continue to constrain inclusive and secure civic participation.

6.1 | Digital Rights and Freedoms

Somalia's digital environment <u>remains relatively open</u> but fragile, with emerging patterns of control that pose growing risks to civil society's effectiveness. While the country <u>has not experienced</u> government-imposed nationwide internet shutdowns in recent years, targeted restrictions on specific platforms—such as the <u>2023 bans</u> on TikTok and Telegram (and 1xBet)—signal a shift toward selective censorship. These actions, often justified as responses to indecent content or propaganda, tend to coincide with periods of political sensitivity, raising concerns about their underlying motives and impact on civic actors. For CSOs, such restrictions disrupt outreach, advocacy, and mobilisation, particularly in a context where digital platforms are among the few accessible tools for public engagement.

Despite constitutional protections for freedom of expression and access to information, enforcement remains inconsistent and largely symbolic. The <u>Somalia Cyber Crime Bill</u> approved in August 2025 aims to safeguard digital security and national interests by preventing the unlawful use of computer systems and modern devices, and protecting

confidentiality, security, and public morality. However, concerns have been raised about its potential to limit online freedoms and increase surveillance. Additionally, the <u>Data Protection Act</u>, <u>2023</u> establishes a legal framework for the protection of personal data, granting individuals rights to access, correct, or delete their personal information. While these laws provide a foundation for digital rights, their enforcement and the balance between security and freedom remain areas of concern.

Panelists described a pattern of <u>ad hoc censorship</u>, takedown pressures, and online harassment targeting journalists and civic actors, especially those addressing governance and human rights issues. These practices, though not systematic, contribute to a climate of uncertainty and self-censorship, weakening the digital space as a platform for civic discourse. The absence of a comprehensive legal framework governing digital rights and online content further exacerbates vulnerabilities, leaving users exposed to surveillance and manipulation without clear safeguards or accountability mechanisms.

Government surveillance of political content online appears limited but is increasing in scope. While there is <u>no evidence</u> of widespread filtering or deletion of posts, recent official statements hint at intentions to tighten control over online narratives. This trend, coupled with the lack of transparency around enforcement, raises concerns about the potential targeting of CSOs and their members. Private platforms, meanwhile, play a minimal role in moderating content in Somalia, and there are few mechanisms to ensure their practices align with human rights standards or government policies. The absence of coordination between state actors and tech companies leaves gaps in accountability and oversight.

Incidents of persecution for online activity, though not widespread, <u>are documented</u>. Journalists covering CSO activities have faced arrests and threats, and civic actors report harassment linked to their digital advocacy. Since March 2025, Somali security personnel have arrested, assaulted, or harassed at least <u>41 private-media journalists</u>. These actions have been described by local press rights groups as an "alarming escalation" in attacks on the media.

These cases reflect the broader risks faced by individuals engaging in online civic work, particularly in politically sensitive contexts. While Somalia's digital space <u>remains more open</u> than in many neighboring countries, the lack of institutional protections and the growing tendency toward selective control undermine civil society's ability to operate freely and effectively online.

6.2 | Digital Security and Privacy

While the internet remains largely stable and free from widespread shutdowns or overt cyberattacks in Somalia, the underlying infrastructure for digital security and privacy is weak and underdeveloped. The adoption of the Data Protection Act No. 005/2023, and the establishment of the Data Protection Authority marked a significant step toward safeguarding digital rights. Positively, the law grants individuals rights over their data and requires transparency from data controllers. Negatively, it exempts law enforcement and national security activities, limits the Authority's independence, and leaves terms like 'public data' unclear. In parallel, the National Communications Act (2017) established the National Communications Authority (NCA) to regulate telecoms, internet, broadcasting, and ecommerce. Positively, it fosters structured regulation, promotes investment, and protects consumers. Negatively, it excludes military communications, and its effectiveness depends on the NCA's operational capacity.

Despite constitutional protections for privacy, CSOs operate in an environment where digital threats are real and largely unaddressed. Panellists reported frequent risks such as doxxing,

SIM-swap attacks, and the exposure of beneficiary data through insecure platforms like shared spreadsheets and open messaging apps. In the absence of robust enforcement mechanisms or clear redress pathways, CSOs are left to self-secure, often without the technical expertise or resources to do so effectively. This undermines their ability to communicate safely, protect their stakeholders, and engage confidently in online advocacy or coordination.

Somalia's cybersecurity status is categorised as Tier 4 (Evolving) in the ITU's 2024 Global Cybersecurity Index, with a score of 37.4 out of 100. This indicates a basic commitment to government-driven cybersecurity, but the country lacks many cybersecurity measures. The lack of minimum encryption standards, breach notification protocols, and lawful-access procedures creates a fragile digital ecosystem. Moreover, there are indications of state-linked actors manipulating online discourse, spreading disinformation, and intimidating civic voices through social media. These tactics, though not always traceable, contribute to a climate of digital insecurity and erode trust in online civic spaces.

Without reliable digital protections and enforcement, CSOs face constant vulnerability that limits their operational effectiveness and discourages open engagement. The absence of institutional support for digital privacy not only compromises their safety but also weakens their credibility and reach. For civil society to thrive in Somalia's digital age, legal reforms must be matched by practical implementation, technical capacity-building, and a commitment to safeguarding civic actors from both overt and covert digital threats.

6.3 | Digital Accessibility

Digital access in Somalia has expanded significantly in recent years, creating new opportunities for civil society actors to engage with communities and share content online. With over half the population now connected (55.2% internet penetration) to the internet, and mobile money usage nearly universal among adults, the infrastructure for digital civic participation is increasingly robust. CSOs are able to reach urban populations through low-bandwidth platforms such as WhatsApp, Telegram, and Facebook Lite, while mobile networks and agent systems extend basic services to rural areas. This growing connectivity has reduced some of the logistical barriers to civic engagement and service delivery, allowing CSOs to operate more flexibly across diverse regions.

However, access alone does not guarantee inclusion. Despite the expansion of internet services, digital literacy <u>remains a major constraint</u>. Many citizens and CSO staff lack the basic information and data literacy skills needed to effectively use digital tools or interpret online content. This gap is particularly <u>pronounced among marginalized groups</u>, where gender, <u>geographic</u>, and economic disparities further limit the ability to engage meaningfully in digital civic spaces. Without targeted investment in digital education and capacity-building, the benefits of connectivity risk are being unevenly distributed, reinforcing existing patterns of exclusion.

Emerging technologies such as artificial intelligence (AI) are beginning to shape the digital landscape, but both CSOs and the general population remain largely unprepared to engage with these tools. While some telecommunications companies have <u>introduced advanced services</u> like 5G in urban centres, the broader civic sector lacks the technical expertise and institutional support to leverage AI for advocacy, service delivery, or public engagement. As digital systems evolve, the absence of strategic planning around technological adaptation could widen the gap between those who can participate in civic life and those who cannot.

In this context, the effectiveness of civil society is increasingly tied to digital inclusion. Infrastructure improvements have laid a foundation for engagement, but without parallel efforts to build digital skills and ensure equitable access, CSOs will struggle to mobilise communities,

disseminate information, and influence public discourse.	Bridging the digital	divide is not c	only
a technical challenge—it is a civic imperative that will of	determine the reach	, relevance, a	and
resilience of civil society in Somalia.			

C) Recommendations

This Country Focus Report identifies persistent challenges across six principles of the enabling environment for civil society actors in Somalia. This section consolidates priority cross-cutting recommendations, organised by the primary actors responsible for advancing reform.

For the Government of Somalia

- Protect constitutional rights in practice by enforcing freedoms of expression, association, assembly, and access to information, and preventing arbitrary shutdowns, media harassment, and unlawful restrictions.
- Standardise and clarify administrative procedures across federal and regional levels to reduce confusion and discretionary enforcement.
- Reform CSO registration and oversight by reducing fees, harmonising processes, and ensuring transparent, timely approvals free from political interference.
- Operationalise the Data Protection Act (2023) through clear regulations, registry procedures, Data Protection Impact Assessment (DPIA) templates, and multilingual toolkits for CSOs.
- Adopt a Right to Information law aligned with AU standards, including proactive disclosure and public registers of decisions affecting CSOs.
- Institutionalise participation through structured consultation calendars, inclusive representation in national dialogues, and public feedback mechanisms.
- Create independent grievance and appeals mechanisms with judicial oversight and due process for all government actions affecting CSOs.
- Commit to no nationwide internet shutdowns, and define court-reviewable rules for online content moderation to protect civic voices.

For Somali Civil Society Actors

- Strengthen coalitions and coordination to build unified advocacy platforms and resist fragmentation.
- Increase community accountability through participatory planning, feedback loops, and grassroots engagement to counter perceptions of donor-driven agendas.

- Diversify funding approaches by promoting local philanthropy, Corporate Social Responsibility (CSR), membership schemes, and social enterprise models.
- Support capacity building for small CSOs to navigate administrative frameworks and improve compliance.
- Invest in digital security by adopting baseline protections (e.g., Multi-Factor Authentication (MFA), encryption, secure backups) and building resilience against online threats.
- Champion inclusivity by elevating women, youth, and marginalised groups in leadership roles and civic coalitions.
- Promote civic literacy through storytelling, dialogue with traditional and religious leaders, and public education campaigns.
- Advocate for legal protections by collectively pushing for legislation that prohibits arbitrary interference and ensures due process.

For Donors and International Partners

- Provide flexible, multi-year funding that includes core support for staffing and institutional development.
- Create small-grant windows with simplified applications for community-based and grassroots CSOs.
- Directly support local CSOs rather than routing funds through international intermediaries, prioritising women- and youth-led organisations.
- Support shared services such as audit, compliance, and M&E systems that CSOs can access collectively.
- Track and publish localisation metrics, including the proportion of funding reaching Somali CSOs directly.
- Fund digital security baselines and pilot a CSO-focused Computer Emergency Response Team (CERT)/ Computer Incident Response Team (CIRT) model for incident response and phishing alerts.
- Support regulatory capacity by assisting the Data Protection Authority (DPA) and National Communications Authority (NCA) with resources, technical expertise, and training to implement digital rights frameworks.
- Promote civic inclusion by backing initiatives that expand participation of marginalised groups and protect journalists and human rights defenders.
- Invest in narrative change through civic literacy campaigns, independent media, and platforms that showcase CSO impact and build public trust.
- Ensure predictable donor pipelines by publishing annual funding calendars and coordinating with local actors on project co-design.

D) 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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