



SUPPORTING  
AN ENABLING ENVIRONMENT  
FOR CIVIL SOCIETY

# **Enabling Environment Snapshot**

**Malawi**

**August 2026**

## Context

### Period covered by this report: April 2026 – August 2026

Between April and August 2026, Malawi's context for an enabling environment for civil society revealed a sharper tension between formal opportunities for engagement with civil society and increasing regulatory, institutional and economic pressures on civic actors. The period saw positive developments, including continued civil society participation in policy and accountability processes, the operationalisation of the new Open Government Partnership framework, and opportunities created by the Government's review of the NGO Policy. At the same time, regulatory enforcement by the NGO Regulatory Authority (NGORA), concerns about the institutional independence of the regulator, internal fragmentation within major civil society coalitions, pressure on activists, and resource constraints continued to test the resilience of civic space.

The most significant legal and regulatory development was the increased operationalisation of the NGO regulatory framework. NGORA published a [roadmap for implementing the Operations of International NGOs Regulations, 2024](#) and moved to enforce mandatory partnerships between international and local NGOs. NGORA also intensified annual reporting and compliance requirements, including submission of 2025 annual reports. These developments provide a legitimate accountability framework, but their cumulative effect raises questions about proportionality, administrative burden and the ability of smaller organisations to remain compliant.

The period also generated concerns about the independence of civic institutions. In April 2026, the Chief Secretary to Government directed the secondment of NGORA CEO Dr. Felix Lombe to the Malawi College of Accountancy. Seventeen CSOs challenged the move, arguing that the power to appoint, deploy and manage NGORA staff rests with the NGORA Board. The [Times Group report on the dispute](#) and [Nation Online's coverage](#) illustrate why the episode became an institutional-independence issue for civil society.

Freedom of expression and accountability advocacy also remained contested. In July 2026, governance activist Sylvester Namiwa was arrested on allegations including publishing false news and conduct likely to cause a breach of the peace after publicly calling for audits and lifestyle scrutiny of public officials. The arrest was followed by competing civil society responses, including a [call for a fair trial and respect for constitutional safeguards](#).

The period also saw some positive developments for the Enabling Environment. Malawi's [OGP framework and current action plan](#) provide structured opportunities for civil society participation in public accountability, digital governance and public participation. Civil society also continued to influence public policy debates, including on the reformed Constituency Development Fund (CDF), where CSOs raised concerns about stakeholder ownership, political influence and transparency.

Overall, the April–August 2026 period suggests that Malawi's civic space is formally open for civil society to operate and engage with the government, but operationally uneven and increasingly contested. Compared with the previous snapshot, there is progress in institutionalised participation and open-government commitments, but also greater regulatory pressure, resource vulnerability, institutional uncertainty and fragmentation within civil society. The central priority is to convert formal consultation mechanisms into predictable, accountable and rights-respecting participation while strengthening the capacity and sustainability of civil society actors.

## 1. Respect and protection of fundamental freedoms

In Malawi, the constitutional guarantees of freedom of expression, association and assembly remain in place, but their practical exercise continues to be uneven. During the reporting period, the arrest of governance activist Sylvester Namiwa became a significant test of the operating environment for critical voices. On 30 July 2026, Namiwa was arrested after being summoned by police and was reportedly held at Lingadzi Police Station on allegations of publishing false news and conduct likely to cause a breach of the peace. Reporting by the [Times Group](#) and subsequent civil society reactions documented the incident. The case is particularly relevant to civic space because Namiwa had been publicly calling for a forensic audit of the [Beautify Malawi Trust](#) and a lifestyle audit of a government minister. A later [civil society statement reported by Maravi Post](#) stressed that an arrest should not be treated as proof of guilt and called for due process and a fair trial.

At the same time, Malawi has retained important legal protections for expression. The Constitutional Court's July 2025 decision striking down criminal defamation under Section 200 of the Penal Code remains a significant positive development. The [Malawi Legal Information Institute records the judgment](#), while [MISA Malawi welcomed the decision](#). However, other laws affecting online expression continue to create risks for the enabling environment. The [Electronic Transactions and Cyber Security Act 2016](#), for example, criminalises “offensive communication” under Section 87 where electronic communication is considered to disturb the peace, quietness or privacy of another person, with a penalty of up to one year's imprisonment. Section 88 further criminalises cyberstalking, while Section 24 permits restrictions on online public communication for purposes including protecting public order and national security and facilitating technical restrictions on access to online communication.

These provisions are relevant to the enabling environment because their broad wording can create uncertainty about the boundaries of legitimate online criticism, commentary and advocacy. Where criminal sanctions apply to vaguely defined forms of communication, journalists, human rights defenders, civil society organisations and ordinary citizens may exercise greater caution when criticising public officials, institutions or Government policies. The concern is therefore not that Malawi lacks any legal basis for regulating harmful online conduct, but that restrictions affecting expression should be clearly defined, necessary and proportionate, with adequate safeguards against their use to suppress legitimate public-interest speech. The continued existence of these provisions means that the decriminalisation of defamation, while an important advance, has not removed all legal risks surrounding freedom of expression, particularly in the digital environment.

Fundamental freedoms were also exercised through peaceful public advocacy. In May 2026, Citizens for Justice and Equity notified authorities of a planned demonstration in Lilongwe concerning alleged assault by the Blantyre mayor. The planned action was reported by [Malawi24](#) and demonstrates that civic actors continue to use assembly and public advocacy to demand accountability.

## 2. Supportive legal and regulatory framework

The reporting period saw a significant shift from the development and adoption of the NGO regulatory framework toward its active operationalisation and enforcement, particularly the NGO (Amendment) Act (2022) and regulations governing NGO registration, reporting, compliance and the operations of international NGOs. NGORA's mandate is to register, regulate and oversee NGOs, and its [official website](#) identifies compliance enforcement as one of its core functions. During the reporting period, this regulatory role became increasingly visible through the implementation of reporting and compliance requirements, the operationalisation of the 2024 Operations of International NGOs Regulations, and measures targeting non-compliant organisations. NGORA states that [failure](#) or refusal to comply with the NGO Act or regulations may result in registration being withheld, suspended or cancelled, although the affected organisation must first be given an opportunity to be heard.

There is evidence that compliance requirements are creating significant challenges for parts of the NGO sector. In February 2025, NGORA [reported that only 167 of 1,153 registered NGOs](#) had submitted the reports required for 2025 licence renewal, compared with 649 of 1,132 NGOs that had submitted reports in 2024. NGOs without valid licences were warned that their operations could be shut down. This indicates that a substantial proportion of registered organisations have experienced difficulties meeting reporting and licensing requirements, although the available evidence does not establish how many organisations subsequently had their registration formally suspended, cancelled or withheld.

NGORA also intensified annual compliance processes. In June it reminded NGOs that 30 June 2026 was the deadline for submitting 2025 annual reports and subsequently extended the deadline to 31 July because of challenges with the submission process. These notices are available through the [NGORA news archive](#) and [the extension notice](#). The extension represents a constructive response to implementation challenges and provides organisations additional time to comply. However, the scale and frequency of compliance requirements continue to place administrative demands on NGOs, particularly those with limited financial, technical and administrative capacity.

The compliance challenge therefore has a potentially important enabling-environment dimension. Registration and licensing requirements are legitimate mechanisms for ensuring accountability and transparency within the NGO sector. However, where a large proportion of organisations struggle to meet reporting or licensing requirements, particularly where non-compliance can result in the loss of legal authority to operate, the regulatory framework can create barriers to continued participation in civic space. This is particularly relevant for smaller and community-based organisations that may have limited financial, administrative and technical capacity to meet recurring compliance obligations. The consequences of non-compliance can also extend beyond the formal loss of registration. NGORA has previously indicated that some NGOs have lost direct funding opportunities because of non-compliance, potentially placing them at a disadvantage relative to larger organisations with stronger administrative capacity. [Malawi News Agency](#) suggests that compliance status can affect not only an organisation's legal ability to operate but also its ability to access resources necessary for sustained civic engagement and service delivery.

The regulatory environment also expanded during the reporting period through implementation of the Operations of International NGOs Regulations, 2024. In March 2026, NGORA announced that it would commence full enforcement of [mandatory partnerships](#) between international and local NGOs from May 2026, as part of the localisation agenda,

with a requirement for international NGOs to channel [at least 30% of programme funding through local NGO partners \(Article 6.2, bullet 7\)](#) reflecting the Government's localisation agenda and an intention to strengthen the capacity and sustainability of local civil society organisations. The measure is intended to strengthen local organisations and promote localisation, but its implementation also creates new compliance obligations for both international and local NGOs. In June 2026, NGORA published a [Guidelines and Road-map on the Implementation of the Operations of International NGOs Regulations, 2024](#). The roadmap operationalises mandatory partnerships between international and local NGOs. NGORA had announced that full enforcement would commence in May 2026 pursuant to provisions 5–12 of the 2024 Regulations. The [NGORA enforcement notice](#) provides the Authority's own account of the measure. Now, the impact on civic space will depend on whether the requirement expands meaningful opportunities and resources for local organisations or creates additional administrative and operational barriers to partnership and programme implementation.

The available evidence therefore points to an increasingly active regulatory environment in which compliance requirements have become consequential for organisations' ability to maintain their registration, access funding and continue operations. NGORA identifies withholding, suspension and cancellation of registration as possible consequences of non-compliance, and during the reporting period it also published [a list of non-compliant organisations](#) as part of its compliance enforcement efforts. Continued monitoring is necessary to establish whether enforcement is proportionate and consistently applied, whether organisations are given adequate opportunities to remedy non-compliance, and whether enforcement measures disproportionately affect smaller, grassroots or advocacy-oriented organisations.

The period also generated concern about the independence of the regulator. On 14 April 2026, the Chief Secretary to Government wrote to NGORA CEO Dr Felix Lombe directing his secondment to the Malawi College of Accountancy. Seventeen CSOs subsequently challenged the move, arguing that authority over NGORA staff rests with the Board. The [Times Group report of 4 May 2026](#) and [Nation Online report of 30 April 2026](#) document the dispute. The episode raised a broader question about the institutional autonomy and credibility of the statutory regulator.

The [NGO Policy review](#) process remains an important opportunity to address the gaps identified in the baseline. The review of the NGO Policy is ongoing. The [NGORA strategic documents page](#) continues to host the NGO Policy and related regulatory materials, while the current reform process provides a platform for CSO inputs.

### 3. Accessible and sustainable resources

Resource scarcity remains a defining structural constraint for CSOs. The Baseline Enabling Environment Snapshot identified heavy donor dependence, weak domestic charity and growing operational pressures. During the reporting period, these pressures remained substantial, with reductions and restructuring of international assistance affecting governance, health, community development and economic empowerment programming. The revised baseline evidence notes that [USAID funding reductions and restructuring affected civil society programming and community economic empowerment activities](#). The promulgation that the United Kingdom [plans to reduce its aid from around 0.5% of gross national income \(GNI\) to 0.3% in 2027](#) is likely to affect charitable organisations in the global south, with developing countries to feel the move heavily.

The funding environment is therefore an enabling environment issue as well as an organisational issue. When CSOs lose funding, their ability to conduct community outreach, monitor public institutions, undertake research, support vulnerable groups and sustain local advocacy networks is reduced, particularly for grassroots organisations with limited reserves.

CONGOMA has continued promoting social enterprise as an alternative source of organisational income, building on social-enterprise policy work initiated in 2024. The approach is intended to help NGOs develop mission-aligned income generating activities that can supplement donor funding, strengthen organisational resilience and reduce dependence on external grants. CONGOMA's initial social enterprise training was conducted in July 2024, and the initiative was subsequently expanded through a 2026 [Social Enterprise Training Programme](#) targeting both local and international NGOs. The programme was designed to provide NGOs with practical knowledge and tools to develop income-generating models while maintaining their social missions.

There are also indications that the social-enterprise and broader income-diversification approach is beginning to extend beyond CONGOMA. NGORA has encouraged NGOs to [strengthen resource mobilisation](#), including through local fundraising, private-sector partnerships, income-generating activities and social enterprise models. Some organisations have begun exploring entrepreneurship and vocational training as potential sources of organisational income. However, the available evidence does not yet demonstrate widespread adoption or establish how many NGOs have successfully implemented sustainable social-enterprise models. The initiative should therefore be understood as an emerging sector response rather than an established alternative financing system.

This development is particularly relevant in the wider context of declining and increasingly uncertain donor funding in Malawi.

The funding environment has also created direct operational consequences for civil society. In August 2026, CONGOMA reported that some NGOs were [struggling to meet statutory compliance costs](#), including audit fees and regulatory payments, because they had been unable to secure new funding. NGORA's latest figures showed that only 67 percent of approximately 1,000 active NGOs had submitted their annual reports to NGORA for the year ending December 2025, leaving more than 300 organisations yet to comply. This demonstrates that funding constraints are no longer only a question of organisational growth; they can affect an NGO's ability to meet regulatory obligations and therefore its ability to remain operational.

The broader funding context therefore makes diversification increasingly important for the sustainability of Malawi's civil society sector. At the same time, social enterprise cannot yet be considered a substitute for donor financing. Many CSOs, particularly smaller and grassroots organisations, may lack the capital, business expertise, markets and organisational systems required to establish viable income-generating ventures. Social enterprise should therefore be viewed as one component of a broader financing strategy that includes local philanthropy, private-sector partnerships, membership contributions, government and domestic financing, and more flexible donor support.

The emerging social-enterprise agenda should therefore be considered within the wider question of how Malawi can build a financially sustainable and diverse civil society sector. The priority is not simply to encourage NGOs to become businesses, but to create an

enabling financing environment in which organisations can combine responsible income generation with local philanthropy, private-sector engagement and predictable donor support without compromising their independence, non-profit character or ability to undertake public-interest advocacy.

NGORA's [2025 NGO Sector Report](#) remains the latest published sector report and shows a sector with a substantial and diverse organisational presence, but facing sustainability and compliance challenges. The report highlights persistent challenges around funding sustainability, organisational capacity and regulatory compliance, with smaller organisations particularly vulnerable to these constraints. These pressures affect not only organisational sustainability but also the ability of CSOs to maintain programmes, participate in advocacy and contribute effectively to civic engagement.

## 4. Open and responsive state

Government–civil society relations remain mixed. Formal opportunities for engagement have strengthened through the [Open Government Partnership \(OGP\)](#), particularly through the National Steering Committee, which brings together government and civil society representatives, and technical working groups responsible for individual OGP commitments. The current 2025–2028 OGP framework provides a structured platform for CSOs to participate in monitoring and implementation, including commitments on anti-corruption, open contracting, access to information and citizen participation. However, implementation of these mechanisms has been uneven. The OGP's [independent assessment of the previous 2023-2025 action plan](#) found that, although a formal steering committee with equal government and non-government representation was established and met quarterly, many CSOs felt detached from implementation because their roles were unclear and they lacked resources to participate effectively. The assessment also noted lingering mistrust between government and civil society, with CSOs largely taking a back seat during implementation. Thus, while the OGP has created a more structured avenue for government–civil society engagement, its practical impact on sustained and influential CSO participation remains limited.

The [Malawi OGP Action Plan](#) provides a structured basis for civil society participation in anti-corruption, digital governance, fiscal openness and public participation. This is a positive development compared with the baseline's description of consultation mechanisms that were often uneven.

Civil society engagement was also visible in the debate surrounding the reform of Malawi's Constituency Development Fund (CDF), a [government-funded mechanism for financing development projects](#) identified at constituency level, such as schools, health facilities, roads, water and sanitation infrastructure. The Fund is therefore an important channel through which public resources reach local communities, with [allocation increased to K5 billion per constituency for 2026/27](#) (around 29 million USD), making its governance and accountability particularly crucial for citizens and civil society organisations. The [reform followed a 2025 High court ruling](#) that found the previous involvement of Members of Parliament (MPs) in administering the Fund inconsistent with the constitutional separation of powers, shifting greater responsibility to local councils.

CSOs subsequently engaged Government and public debate on the new framework. A [coalition of 12 NGOs raised concerns](#) that the 2026 guidelines did not adequately reflect broad-based consultation and that MPs retained roles in project identification, prioritisation, supervision and monitoring, potentially blurring the distinction between legislative oversight and executive functions. The coalition called for clearer separation of roles, greater transparency, independent auditing and stronger community monitoring. This engagement helped place transparency, separation of powers and citizen oversight at the centre of the CDF reform debate, although concerns remained about the extent to which civil society and community views were incorporated into the final framework. The issue is particularly relevant to civic space because CDF decisions directly affect citizens' participation in local development priorities and provide CSOs with an important entry point for social accountability and monitoring of public expenditure.

This illustrates both progress and limitation. CSOs can influence public debate and raise governance concerns, but the quality of the enabling environment depends on whether government institutions systematically incorporate, respond to and provide feedback on civic inputs. The NGORA CEO dispute similarly demonstrated that formal state–civil society relations can become strained where institutional independence is perceived to be at risk.

There were also developments in the implementation of Malawi's Access to Information (ATI) framework during the reporting period. The Malawi Human Rights Commission (MHRC), which is mandated to oversee implementation of the ATI Act, made available its [January 2026 monitoring report on compliance by information holders](#), including information on institutions that had submitted annual ATI progress reports and those that had published information manuals, demonstrating continued institutionalisation of the framework beyond its operationalisation in 2020. Some public institutions have strengthened practical access arrangements; for example, the [Malawi Electoral Commission - MEC](#) provides an online process for submitting information requests and outlines internal review procedures where requests are refused, as well as external review through the MHRC. However, implementation remains uneven. In 2025, [the MHRC](#) reported that inadequate funding was constraining ATI implementation, including civic education and efforts to increase public awareness, while reports also indicated that [many citizens remained unaware](#) of the law and that recruitment of information officers across districts was progressing slowly. The reporting period therefore shows incremental progress in putting the ATI framework into practice, particularly through institutional monitoring and more accessible request mechanisms, but effective access to information remains dependent on institutional capacity, adequate resourcing, public awareness and consistent compliance by information holders.

## 5. Supportive public culture and discourses on civil society

The baseline identified politicisation and negative narratives about CSOs as a persistent issue. During April–August 2026, Government–civil society relations remained mixed, with CSOs continuing to engage Government and Parliament while tensions persisted over criticism of government policies and the extent to which CSO input influences decisions. In March 2026, [Parliament and CSOs](#) established a formal platform for structured cooperation, with the Speaker describing CSOs as “key partners” in oversight, accountability, and linking communities to government processes, while [CONGOMA highlighted weak consultations and persistent misconceptions](#) about CSOs as barriers to effective engagement.

At the same time, political discourse continued to frame critical civil society activism through a political lens. In June 2026, Finance Minister Joseph Mwanamvekha [challenged CSOs to move beyond criticism](#) and provide solutions to the country's economic problems, following CSO concerns over the economic situation and rising fuel prices. This followed earlier concerns over political actors portraying critical civic actors as politically motivated. Such narratives are particularly critical because they can blur the distinction between legitimate public-interest advocacy and partisan political activity. By August, CSOs themselves were publicly warning of increasing political polarisation, politically motivated groups presenting themselves as CSOs, and growing political interest in civil society, with the National Advocacy Platform arguing that these developments were contributing to [uncertainty and shrinking civic space](#). Media coverage therefore presents a mixed picture: CSOs receive positive visibility when advocating on economic hardship, public services and accountability, for example, their April 2026 [campaign against fuel levies](#), but disputes over Government policy, political alignment and the legitimacy of CSO activism tend to generate stronger and more polarising public narratives. There is therefore an increasingly visible distinction between CSOs viewed as constructive development and accountability partners and those perceived as becoming too political or adversarial.

The regulatory environment has reinforced this tension. The [NGO Regulatory Framework](#), including the NGO Partnership Regulations, introduces governance, reporting and accountability requirements intended to strengthen transparency and coordination, but its relevance to Principle 5 lies in how regulation is framed and experienced in the political relationship between the State and civil society. Where compliance requirements are accompanied by narratives that portray critical CSOs as partisan, adversarial or requiring greater government control, they can contribute to a less enabling political culture. This concern is consistent with wider evidence from August 2026, when [CSOs described civic space as increasingly uncertain and politically polarised](#), including concerns about political infiltration of civil society. Generally, there was no fundamental shift away from the baseline pattern of politicisation; instead, the reporting period showed a dual narrative in which CSOs were simultaneously recognised as legitimate partners in governance and increasingly scrutinised or politically framed when they challenged government decisions.

At the same time, internal fragmentation within prominent civil society coalitions presented a challenge to collective advocacy. The Human Rights Defenders Coalition (HRDC) [experienced an increasingly public leadership dispute](#) involving questions over the holding of an Annual General Meeting (AGM), leadership legitimacy, financial accountability and competing interpretations of court proceedings. The HRDC leadership dispute had moved to court, with an ad hoc committee reportedly seeking an AGM to elect new leadership and disclosure of donor funding. The dispute subsequently continued through public statements and court proceedings. By late July 2026, [continuing disagreements](#) were reported between factions over the legitimacy of the leadership and the meaning and implications of the court proceedings. The report also indicated that the parties had attempted to engage institutions including the NGO Regulatory Authority (NGORA) before turning to the courts. The dispute is relevant to the enabling environment, not because internal disagreement is itself a restriction, but because prolonged public conflict can weaken the credibility, coordination and collective advocacy capacity of civil society. Continued fragmentation could make it more difficult for CSOs to develop unified positions, engage Government effectively and respond rapidly to civic-space threats.

At community level, civic participation remains an important source of resilience. The [UN Malawi 2025 Country Results Report](#) records the operationalisation of social accountability

platforms and strengthening of CSOs to monitor social protection delivery and engage duty bearers. This suggests that civic culture is not uniformly deteriorating; national-level discourse is more contested while local participation mechanisms remain active.

## 6. Access to a secure digital environment

Malawi's digital environment remains an important avenue for civic engagement, public accountability and mobilisation. The baseline identified broad social-media access alongside concerns about the Electronic Transactions and Cyber Security Act, online harassment, misinformation and weak organisational cyber-security capacity.

Digital governance is now a stronger area for institutionalised reform. Malawi's OGP commitments include [promotion of digital literacy, rights and inclusion](#) and [enhancing access to information through e-government](#). These commitments provide an opportunity for CSOs to shape policy on digital participation, privacy, inclusion and access to government information.

However, legal and practical risks remain. [Human Rights Watch's Malawi Country Report](#) notes that while criminal defamation was struck down in 2025, Malawi continues to enforce the [Electronic Transactions and Cyber Security Act \(ETSCA\)](#), which has been used to charge journalists and others for online expression. The Act contains broadly framed restrictions on online communication, including provisions that criminalise certain forms of "offensive communication" and permit restrictions on online communication in the interests of public order and national security. In practice, these provisions have been used against people for critical online expression. For example, a 2024 case involved the conviction of Sainani Joshua, who was [fined for allegedly insulting the State President](#) in a [WhatsApp Group](#) under the Act's cyber-spamming provisions. Although no comparable new conviction was identified during the April–August 2026 reporting period, concerns over the continued use of cyber legislation and other legal provisions to restrict critical expression remained relevant. The Electronic Transactions and Cyber Security Act continues to contain broad provisions permitting restrictions on online communication in the interests of public order and national security, while its provisions on offensive electronic communication have previously been used against critical voices. The continued relevance of these provisions, alongside broader concerns about arrests, threats and pressure against journalists and critics, means that the Sainani case can appropriately be presented as a recent precedent illustrating the legal risks surrounding online expression, rather than as an event occurring during the current reporting period.

A 2026 assessment of Malawi's civic space further notes that such provisions can create uncertainty about what constitutes unlawful online speech and may discourage legitimate criticism of public officials. Concerns have also extended to surveillance: Malawi's current Open Government Partnership (OGP) National Action Plan acknowledges [reports](#) of threats and arrests of citizens and media practitioners for online expression, as well as concerns around digital surveillance. The decriminalisation of defamation therefore represents an important advance, but does not eliminate the broader legal and practical risks facing journalists, activists and citizens who use digital platforms to scrutinise or criticise those in power.

The [Namiwa case](#) further illustrates this because his arrest and prosecution followed public statements in which he criticised senior public officials and raised governance and

accountability concerns; he was initially charged with [publishing false news and conduct likely to cause breach of peace](#), with a [treason charge](#) later added. The case therefore demonstrates how public-interest criticism and advocacy can intersect with criminal enforcement, creating potential risks for freedom of expression and a chilling effect on other activists. The concern was heightened when his subsequent [bail conditions reportedly barred him and his organisation](#) from publicly commenting on the case.

## Challenges and Opportunities

### Challenges

- a. Increasing regulatory enforcement may create a heavier compliance burden, especially for small and community-based organisations.
- b. Perceived threats to the institutional independence of regulatory and accountability bodies can undermine confidence in the civic environment.
- c. Economic pressures and donor restructuring are reducing the financial resilience of CSOs and threatening continuity of grassroots programmes.
- d. Public disputes within major civil society coalitions can weaken collective advocacy and provide opportunities for actors hostile to civic oversight to discredit CSOs.
- e. The use of criminal law in response to public-interest advocacy can create a chilling effect even where the legal process remains subject to judicial safeguards.
- f. Digital misinformation, harassment and cyber-security weaknesses expose activists and organisations to reputational, operational and personal-security risks.

### Opportunities

- a. The ongoing NGO Policy review provides an opportunity to clarify regulatory roles, strengthen safeguards and institutionalise meaningful CSO participation.
- b. The OGP framework provides a formal platform for CSO participation in anti-corruption, digital governance, public participation and fiscal openness.
- c. The CDF reform creates an opportunity for CSOs to strengthen community participation, public expenditure monitoring and local accountability.
- d. Regulatory enforcement can be converted into a supportive compliance model through training, technical assistance and accessible guidance rather than punitive enforcement alone.
- e. CONGOMA and district/sector networks can strengthen collective positions, evidence-based advocacy and structured engagement with policymakers and oversight institutions.
- f. Social enterprise and domestic resource mobilisation provide emerging pathways to reduce CSO dependence on volatile international funding.

### Priority actions and Recommendations

- a. **Institutionalise policy-maker and regulator interface meetings.** CONGOMA should maintain regular, structured meetings with NGORA, the Ministry responsible for NGOs, Parliament, oversight bodies and relevant ministries. These should track recommendations and create a follow-up mechanism so that civic-space monitoring leads to policy action rather than ending at reporting.
- b. **Strengthen evidence-based advocacy and strategic engagement.** Civic-space evidence should be converted into concise policy briefs, legal analyses and advocacy messages targeted to decision-makers, with particular emphasis on Parliament and oversight institutions.

- c. **Create a civil society regulatory compliance support mechanism.** CONGOMA and partners should provide practical compliance support, especially to emerging and grassroots NGOs, while documenting disproportionate or unclear enforcement practices.
- d. **Invest in sustainable financing.** CSOs should expand social enterprise, local fundraising, private-sector partnerships and collective resource mobilisation while advocating for a supportive fiscal environment for local philanthropy.
- e. **Strengthen coalition governance and coordination.** National coalitions should strengthen constitutions, AGM requirements, leadership succession, financial accountability and internal dispute-resolution mechanisms to protect credibility and collective advocacy capacity.
- f. **Strengthen digital safety and civic technology.** CSOs should improve cybersecurity, digital risk management, secure data handling and staff awareness while participating in national policy processes on digital rights and inclusion.

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