

Somalia

Country Focus Report 2026



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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



Respect and Protection of Fundamental Freedoms



Supportive Legal and Regulatory Framework



Accessible and Sustainable Resources



Open and Responsive State



Supportive Public Culture and Discourses on Civil Society



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

Period covered by this report: August 2025 - July 2026.

Somalia's civil society continues to operate within a highly fragile and deeply contested environment shaped by decades of armed conflict, state fragility, and an increasingly polarised political transition. While the Federal Government of Somalia (FGS) and various federal member states have sought to consolidate governance, the landscape in 2026 remains burdened by severe political instability, insecurity, and systemic social inequalities. These ongoing crises force Civil Society Organisations (CSOs) to navigate an exceptionally complex operating space where they are frequently caught between competing authorities, unpredictable political dynamics, and a heavily securitised environment.

The federal system, though constitutionally established, has reached a critical and highly contested juncture. On 4 March 2026, the Federal Parliament [approved](#) major amendments to the Provisional Federal Constitution. However, this historic move has triggered a [constitutional and electoral conundrum](#), with key federal member states like Puntland and [Jubaland rejecting](#) the changes, and opposition coalitions denouncing the resulting delay of federal elections to 2027 as a threat to governance stability. Compounding these political disputes, [persistent insecurity](#) driven by Al-Shabaab militants and state-aligned security forces severely restricts civic freedoms. In militant-controlled territories, civic activities and public gatherings remain [strictly prohibited](#), while even in government-controlled areas, the fear of terror attacks and aggressive state policing discourages public organising and protests.

Despite these compounding pressures, Somalia's civil society remains uniquely vibrant and resilient, continuing to step in as a critical lifeline for humanitarian response, peacebuilding, and local advocacy. This is particularly evident in their rapid mobilisation to address severe [climate change and displacement crises](#) across the country. Nonetheless, the sector suffers from deep structural vulnerabilities, including a heavy reliance on unpredictable donor funding, administrative exhaustion, and fragmented local registration systems that vary drastically across different regions. Rights-based advocacy groups are also subjected to routine harassment and are frequently accused of promoting foreign agendas, which undermines their credibility among local communities and state authorities alike.

The media landscape remains highly unsafe, and the [CIVICUS Monitor](#) currently rates Somalia's civic space as "Repressed". Independent journalists face systemic censorship, arbitrary detentions, and physical violence from state actors. For instance, the Somali

Genocide Watch has documented [press freedom violations](#), including the tragic killing of a Mogadishu-based cameraman by police, the violent arrest of female journalists reporting on forced evictions, and sweeping regional reporting bans on security and political issues.

At the same time, Somalia's [rapid digital transformation](#) has expanded opportunities for mobile-based coordination and virtual civic engagement. While the country has avoided nationwide internet shutdowns, online activists face [growing digital surveillance](#), targeted harassment, and politically motivated account restrictions. The absence of mature, enforceable regulatory safeguards leaves civil society highly exposed to data insecurity and state-led digital crackdowns.

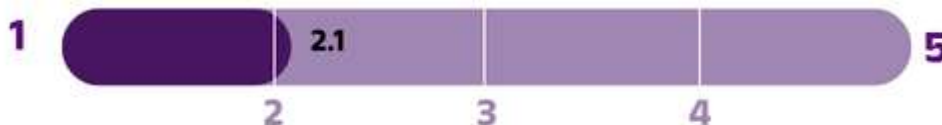
In sum, Somalia's civil society environment remains defined by sharp contradictions: formal constitutional protections exist on paper, but in practice, civic actors operate under intense, continuous pressure from both state and non-state entities.

B) Assessment of the Enabling Environment

PRINCIPLE SCORE

1. Respect and Protection of Fundamental Freedoms

Score: 2.1/5¹



Somalia's [Provisional Constitution](#) provides a formal legal framework for civil and political rights, explicitly guaranteeing the freedom of association under Article 16, freedom of expression under Article 18, freedom of peaceful assembly under Article 20, and the right to privacy under Article 19. However, the operational reality across the country diverges sharply from these constitutional guarantees. Structural enforcement remains fragmented, statutory protections are weak or contradicted by colonial-era legislation, and state-sponsored violations persist with systemic impunity. Civil society actors—including journalists, human rights defenders, trade unionists, and community advocates—routinely face state intimidation, digital surveillance, physical violence, and arbitrary legal restrictions. Reflecting these severe constraints, the CIVICUS Monitor classifies Somalia's civic space as ["Repressed"](#), underscoring a widening systemic gap between aspirational constitutional commitments and the lived experience of civic actors on the ground.

1.1 | Freedom of Association

Freedom of association in Somalia is constitutionally anchored in Article 16 of the [Provisional Constitution](#) and administratively regulated through the [2019 NGO Law](#) alongside [directives](#) from the Ministry of Planning, Investment and Economic Development (MoPIED). While these frameworks establish the formal legal grounds for CSOs to operate, their practical application remains highly uneven. Institutional weakness, executive overreach, political interference, and

¹This is a rebased score derived from the [CIVICUS Monitor rating](#) published in December 2025.

an unstable security climate combine to create an environment where independent associations—particularly those focused on governance, anti-corruption, and human rights—face chronic operational insecurity and arbitrary state interference.

State authorities systematically enforce association rights through a selective, dual-track approach. Service-delivery, humanitarian, and development-oriented CSOs operating in areas such as drought relief, healthcare, or infrastructure generally encounter minimal administrative friction. In contrast, advocacy-focused groups that monitor state conduct, scrutinise public expenditure, or defend political rights face intense regulatory scrutiny, bureaucratic delays, and arbitrary sanctions, as documented in regional civil society oversight [reports](#). This politicised approach makes operational tolerance contingent upon political alignment or silence regarding state practices. The persistent lack of clear, transparent procedural safeguards governing registration under directives from the Ministry of Planning, Investment and Economic Development, including suspension or deregistration, leaves associations highly exposed to discretionary decisions by executive officials, a dynamic closely tracked in country legal assessments by the [ICNL](#) Civic Freedom Monitor for Somalia.

The state's weaponisation of administrative, judicial, and financial mechanisms against independent organisations became increasingly pronounced throughout recent monitoring periods. Independent trade unions, such as the National Union of Somali Journalists (NUSOJ), have experienced sustained [administrative harassment](#) and political interference, particularly during leadership transitions. Similarly, following judicial proceedings before the Banadir Regional Court regarding alleged registration irregularities, authorities [froze the bank accounts](#) of the Somali Journalists Syndicate (SJS) in April 2024—an ongoing restriction that remains in effect—widely condemned by [international press freedom monitors](#) as direct retaliation for the organisation's human rights advocacy before United Nations mechanisms.

This institutional hostility is further compounded by severe structural barriers that disproportionately impact marginalised civic actors. According to [documentation](#) compiled by the Coalition of Somali Human Rights Defenders, human rights defenders operated in an increasingly high-risk environment throughout 2025, with 112 defenders targeted through digital surveillance, arbitrary detentions, and smear campaigns. Women Human Rights Defenders (WHRDs) and women-led CSOs face intersectional threats, navigating restrictive state oversight alongside severe socio-cultural backlash, online gender-based harassment, and exclusion from formal state-CSO consultative bodies. Simultaneously, youth-led grassroots movements and organisations representing minority communities are frequently priced out of formal legal status by exorbitant federal and regional registration fees, leaving them without legal protection or institutional channels to challenge state overreach. Overall, the trajectory of freedom of association has deteriorated, driven by the weaponisation of legal registries, financial freezing, and political conditioning of civic operations.

1.2 | Freedom of Assembly

Article 20 of the Provisional Constitution explicitly guarantees every person the right to organize and participate in peaceful assemblies and demonstrations without prior authorization. Despite this unambiguous constitutional mandate, the statutory framework governing public gatherings actively restricts assembly rights. Federal authorities rely heavily on the outdated [Public Order Law No. 21 of 1963](#), specifically Articles 6, 7 and 8, which mandates prior administrative notification. In practice, local district commissioners and security agencies interpret notification requirements as a mandatory authorisation regime, routinely denying permits on broad, unreviewable grounds of “public security” or “national [defence](#).” In Somaliland, Articles 8 and 9 of the [Public Order and Security Law No. 51 of 2012](#)

similarly grant expansive discretion to Regional Security Committees to ban gatherings and detain individuals without judicial oversight.

Rather than facilitating peaceful protests, security forces—including the Somali National Police, the National Intelligence and Security Agency (NISA), and regional security units—manage assemblies through militarised containment and excessive force. Public demonstrations in major urban centres, particularly Mogadishu, are systematically dispersed using live ammunition, tear gas, physical assaults, and preemptive detentions.

On 29 March 2025, police in Mogadishu [violently dispersed](#) a women-led demonstration protesting sexual and gender-based violence, arresting several participants and temporarily detaining journalists attempting to cover the rally. In May 2026, security forces used live ammunition to clear community demonstrations protesting forced evictions in Mogadishu, [arresting media](#) workers documenting the dispersals. On 4 June 2026, [armed clashes](#) erupted in Mogadishu between state [forces](#) and opposition figures ahead of a planned anti-government rally against constitutional term extensions, leading to heavy weapon deployments, residential blockades, and the complete suppression of the planned assembly.

[Field data](#) from the International Center for Not-for-Profit Law documents a deteriorating trajectory throughout 2025 and 2026, where security forces repeatedly used violence and intimidation to block gatherings addressing governance, forced land evictions, and human rights abuses.

The exercise of assembly rights is further constrained by broader political crises, counterterrorism operations, and heightened security alerts. National security imperatives regarding Al-Shabaab are [frequently co-opted](#) to justify blanket bans on public gatherings in urban centres, while rural and contested regions remain entirely devoid of assembly rights due to armed conflict and total insurgent prohibitions on civic organising. These conditions foster pervasive fear among citizens and civil society actors, driving widespread self-censorship, preemptive cancellations of events, and reliance on clandestine organising.

Assembly rights are experienced with acute inequality across demographic groups. Youth groups and young male protesters are [systematically profiled](#) by state security forces as political agitators or insurgent sympathisers, subjecting them to arbitrary arrests, prolonged pre-trial detention, and physical abuse. Women and girls face [distinct physical risks](#) during public protests, including targeted sexual harassment, physical violence from law enforcement, and social ostracisation. Marginalised minority clans and internally displaced persons (IDPs) face immediate, [unpunished state violence](#) when assembling to protest land grabbing or forced evictions, operating without legal recourse or protective networks. Consequently, freedom of peaceful assembly has deteriorated, characterised by the routine use of lethal force, reliance on repressive pre-independence statutes, and the complete politicisation of public space.

1.3 | Freedom of Expression

Freedom of expression and press freedom are constitutionally protected under Article 18 of the Provisional Constitution, yet Somalia remains one of the most dangerous environments globally for journalists, media workers, and public commentators. The legal ecosystem surrounding expression is [highly restrictive](#), governed by conflicting statutes including the [1964 Penal Code](#) (particularly Articles 215 on subversive or anti-national propaganda, 269 on insult to a political, administrative or judicial body, 328 on publication or circulation of false, exaggerated or tendentious news capable of disturbing public order, and 452(3) on defamation

by means of the press). These vague, broad, and outdated provisions lack the precision required under international standards of legality and are routinely used to arrest, prosecute, and convict journalists for critical reporting.

The [2016 Media Law](#) (notably Article 12 and related provisions on false information, national interest, and propaganda) empowers the Ministry of Information to suspend media outlets and revoke broadcasting licences, often without full judicial process. These powers were used, for example, in the [March 2025 directive](#) prohibiting reporting on security incidents in Mogadishu.

The [Cybercrime Bill](#) approved by the Cabinet on 21 August 2025 aims to prevent unlawful use of computer systems, protect confidentiality, public morality, the national economy, and critical infrastructure. Its broad framing around “public morality” and “national interests” raises concerns that it could be applied to online journalism and critical digital commentary.

Broad provisions within the Anti-Terrorism Law (particularly Article 12(a) criminalising the spreading of “terrorist ideas”) and the Penal Code articles noted above are routinely deployed to criminalise investigative journalism and reporting on security and governance.

The operational climate for independent media is defined by systemic repression, physical insecurity, and total impunity. According to [NUSOJ's 2025 report](#), [72 violations](#) were documented during 2025, including the [killing of Dabaashe](#) on 18 March 2025 in an Al-Shabaab bombing in Mogadishu's Ceel Gaabta area. The Committee to Protect Journalists ([CPJ](#)) and The Somali Journalists Syndicate ([SJS](#)) confirmed that following the attack, police raided Risaala Media, ordered its channels off air, and arrested at least five journalists who had reported on the incident.

[SJS's 2025 report](#) recorded 148 journalists arrested or arbitrarily detained in 2025 (118 in Mogadishu alone), with the National Intelligence & Security Agency (NISA) and Banadir Regional Police as leading perpetrators. State security forces were responsible for the majority of physical assaults and beatings. [SJS documented nine SLAPP cases](#) aimed at silencing journalists and media organisations, including actions targeting SJS itself and its Secretary-General Abdalle Mumin (who faced a [defamation threat](#) from Premier Bank via a UK law firm in 2025). These judicial measures interfered with independent media work and the right to report without fear of legal retaliation.

Key reporting topics that consistently trigger severe state retaliation include official corruption, security force abuses, land grabbing, forced evictions, military casualties, and political disputes surrounding the 2026 electoral roadmap. Media outlets publishing critical coverage face immediate operational threats, including forced closures, licence revocations, and raids.

The intersectional pressures on media workers further illustrate the hostile operating environment. Female journalists face compound risks, including newsroom discrimination, sexual harassment, and targeted online smear campaigns. [NUSOJ recorded 27 SGBV cases](#) against female journalists in 2025 (part of 79 cases between 2023–2025). [SJS noted over 10%](#) of 2025 media violations affected women journalists. Concrete incidents include the [assault of Anisa Ahmed](#) by Mogadishu police on 27 August 2025 (she was grabbed by the neck, threatened, and held for hours after reporting on armed robbery by uniformed men), followed by further [NISA threats](#) of disappearance on 14 September 2025 while she covered forced evictions. Women-led media initiatives and female reporters also face systemic pay gaps, exclusion from politics/security beats, and rising AI-facilitated abuse (deepfakes, voice cloning, and coordinated online smear campaigns). Youth-led digital creators and independent online journalists face parallel arbitrary arrests and profiling under national-security pretexts.

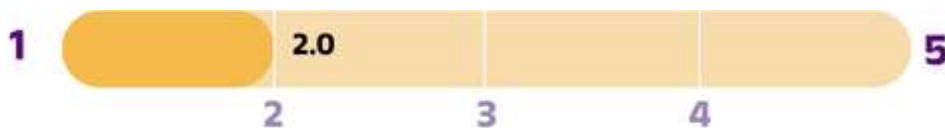
These patterns disproportionately silence women-led CSOs, youth voices, and minority journalists who lack protective networks.

Overall, freedom of expression has deteriorated, as widespread impunity for attacks on journalists, combined with expanding legal mechanisms for digital surveillance and state censorship, effectively force public discourse into severe self-censorship.

PRINCIPLE SCORE

2. Supportive Legal and Regulatory Framework

Score:



During the 2025–2026 reporting cycle, Somalia’s legal and regulatory framework for civil society deteriorated into an unstable administrative environment. Because a unified central NGO law remains permanently stalled, CSOs are forced to navigate competing, multi-layered registration regimes managed independently by individual Federal Member States. This structural vulnerability worsened in March 2026 when the Federal Parliament unilaterally pushed through sweeping constitutional amendments. These amendments extended executive mandates, deferred planned national elections, and triggered a major constitutional split with regional authorities. Operating within this legal fragmentation, local civic groups have no reliable protection from arbitrary executive overreach, selective licence revocations, or state-driven financial blockades.

2.1 | Registration

Registration conditions remained rated as disabling for civil society in the 2026 reporting cycle, indicating no improvement from the 2025 assessment. Although the Cabinet approved a new [draft NGO bill](#) in March 2024 aimed at modernising the regulatory framework, and the Federal Parliament completed [major constitutional amendments](#) in March 2026, the specific operational legal environment for civil society during the 2025–2026 reporting period remains defined by regional fragmentation, persistent administrative delays, financial barriers, and a lack of functional appeal mechanisms.

Article 16 of the [Provisional Constitution of Somalia](#) guarantees the right to freedom of association, and the formal legal framework—governed by the 2019 NGO Law and directives from the Ministry of Planning, Investment and Economic Development—is broadly inclusive in

allowing entities to establish organisations. However, full legislative alignment remains incomplete. The central government continues to mandate registration under Article 54 of the [Civil Law of Somalia No. 37 \(1973\)](#), which requires submitting detailed organisational charters and financial plans to the Ministry of Interior. This relies on an outdated legal base that falls short of international standards, such as the African Commission on Human and People's Rights [Guidelines](#) on Freedom of Association and Assembly, which call for simple, non-discriminatory, and notification-based registration processes rather than expansive administrative discretion.

Establishing and maintaining a civil society organisation involves high costs, documentation burdens, and prolonged processing times. Organisations must clear sector-specific endorsements and project evaluations prior to securing operational approval. Registration fees vary significantly across federal and regional authorities. At the federal level, local NGOs pay an initial fee of USD 500 and annual renewal fees of USD 250, while foreign NGOs face similar baseline charges through the Ministry of Foreign Affairs. Under the [Somaliland NGO Law No. 43/2010](#), local NGOs pay USD 110 for initial registration and USD 60 for renewals. Under the [Puntland NGO Act \(2016\)](#), registration fees are set at USD 200 with USD 100 annual renewals, whereas official regional requirements in Jubaland demand USD 500 for local groups and up to USD 1,000 for international entities. For cross-regional operations, civil society organisations face duplicate or triplicate registration demands, paying separate administrative fees to member state ministries, interior departments, and municipal offices. This dynamic is further reinforced by international funding bodies; for instance, the [GCERF Civil Society Funding Initiative](#) requires applicants to demonstrate active, dual registration with both local member state authorities and the central federal government to qualify for support, while 2026 [UNDP Somalia Grant Calls](#) explicitly mandate a minimum of three years of active legal registration.

A major structural gap in the legal framework is the complete absence of effective administrative or legal appeal mechanisms when registration is denied or delayed. In Somaliland and Puntland, state laws require a minimum quota of founding citizens to register, but provide no recourse if an application is rejected, leaving turned-down organisations legally barred from reapplying for one full year. Across South/Central Somalia, the absence of an enacted federal NGO law leaves organisations without a standardised judicial review pathway. Registration suspensions and denials rest on the discretionary authority of ministry officials, exposing applicants to political bias without a formal right to appeal. Although the draft NGO bill approved by the Cabinet in March 2024 proposed a mandatory 90-day registration decision period and a 30-day judicial appeal process, this draft had not been fully enacted into law during the current reporting period.

During the reporting period, administrative registration procedures were selectively applied to target critical civic voices. In 2025, authorities and affiliated institutions used registration-related and administrative pretexts to impose [financial restrictions](#) on the Somali Journalists Syndicate, including the suspension of its bank accounts by Premier Bank following a defamation threat against its Secretary-General. [SJS documented](#) nine incidents of legal harassment and SLAPP lawsuits during the year that specifically targeted the organisation and independent journalists for their human rights reporting and public advocacy.

The fragmented and costly framework creates severe barriers for marginalised and under-resourced groups. Women-led and youth-led organisations, which often rely on small micro-grants or voluntary contributions, are disproportionately priced out by registration fees and lack the legal capacity to navigate complex administrative layers. Disability rights organisations face severe physical and logistical obstacles when mandated to complete duplicate, in-person filings across scattered regional and federal offices. Rural and

community-based collectives located outside major urban centres incur significant travel costs to submit documentation, forcing many to remain informal and excluded from funding streams. Additionally, grassroots networks representing minority clans face informal socio-political gatekeeping and discretionary delays from regional authorities, further restricting their ability to acquire legal status.

2.2 | Operational Environment

The legal framework governing civil society's operational environment was rated as disabling, indicating a negative shift from the enabling rating assigned in 2025 and reflecting a less favourable environment for civil society operations in Somalia. This deterioration is driven by high-level political fragmentation, administrative and compliance pressures, financial constraints, and targeted security-force interventions against civic actors.

Political fragmentation directly impacts civil society operations across subnational borders. Following the Federal Parliament's approval of sweeping constitutional revisions on 4 March 2026, major regional authorities including the Puntland State Government and the Jubaland Administration formally rejected the federal governance measures. As detailed in analysis by [Somali Public Agenda](#) and regional alerts from [Hivos EuSEE](#), this severe political polarisation creates conflicting regulatory mandates where basic operating rules, tax expectations, and activity permits shift based on territorial disputes. Civil society organisations registered with federal ministries in Mogadishu encounter administrative non-recognition or operational obstruction when attempting to extend activities into Puntland or Jubaland without securing separate regional registrations and local ministry endorsements.

Organisational autonomy and internal governance remain heavily constrained by state oversight mechanisms. Federal and regional line ministries mandate that non-governmental entities align their projects directly with official state frameworks managed through the [Ministry of Planning, Investment and Economic Development](#). State authorities exert informal pressure regarding executive board selections, staff recruitment, and project geographic targeting, particularly when organisations operate in politically sensitive zones. Civil society organisations must navigate mandatory approvals from line ministries prior to executing field work, restricting their ability to set strategic priorities independently or address controversial governance and human rights issues.

Permit and activity pre-approvals represent a major administrative hurdle. State and municipal authorities require explicit clearances for public workshops, field surveys, civic education, and monitoring missions. Security services routinely invoke public order statutes alongside municipal directives to compel organisations to apply for permits prior to organising community gatherings or issuing public reports. Permit issuance is applied selectively, with state bodies routinely granting approvals for neutral service delivery while delaying or denying permissions for organisations monitoring human rights abuses, land rights, or anti-corruption efforts.

Administrative oversight and reporting requirements create heavy compliance burdens. Under administrative directives enforced by state authorities, as set out in Article 17 of the [2019 Non-Governmental Organisations Act](#) (requiring annual financial and narrative reports covering progress on activities, budget utilisation, staff and assets lists, challenges, and an annual audit report) and as further documented in the [ICNL Civic Freedom Monitor](#), organisations are required to submit detailed project profiles, independent audit statements, target beneficiary lists, funding sources, and activity reports. Organisations operating in multiple member states must submit separate, unstandardised quarterly reports to different regional and federal

offices. Failure to meet these overlapping reporting deadlines results in administrative penalties, freezing of work permits, or threats of operational suspension.

Funding restrictions and financial constraints severely limit organisational capacity. Reductions in global humanitarian assistance throughout 2025 and 2026 have led to major funding shortfalls for local organisations, as documented in country enabling snapshots by [Hivos EuSEE](#). In addition, donor compliance rules—including mandatory multi-year registration records, verified independent audits, and strict counter-terrorism screening—disproportionately penalise smaller local groups that lack formal administrative infrastructure. Banking institutions operating under central bank regulations enforce strict verification protocols, resulting in delayed wire transfers for local civil society projects.

A clear distinction exists between administrative controls and direct security-force intimidation. While administrative controls rely on permit denials, reporting audits, and account oversight, security-force interventions involve physical enforcement and arbitrary detention. On 8 May 2026, members of Somalia’s U.S.-trained Mobile Vehicle Checkpoint Unit and NISA officers [raided](#) a venue in Mogadishu, assaulting and detaining three human rights media workers—including Mohamed Ibrahim Osman (Bulbul), Secretary for Information and Human Rights at the [Somali Journalists Syndicate](#), as documented by the [International Press Institute](#) and [The Guardian](#). The journalists were interrogated, beaten, and threatened regarding their reporting on prison abuses, illustrating the physical risks faced by civic actors documenting state practices.

Operational barriers affect groups unequally across gender, geographic, and organisational lines. Women Human Rights Defenders operate under intense administrative scrutiny alongside heightened socio-cultural pressures, facing targeted intimidation, digital harassment, and funding shortfalls when addressing sensitive issues like sexual violence or political rights, as documented by the [Coalition of Somali Human Rights Defenders](#) and [Women in Media Somalia](#). Organisations representing persons with disabilities encounter physical infrastructure barriers, a lack of accessible formats during policy consultations, and exclusion from government funding streams, as detailed by the [Somalia Disability Empowerment Network](#). Organisations operating in rural or conflict-affected areas outside major urban centres face compounded challenges, as highlighted in baseline studies by [Hivos EuSEE](#), where groups must navigate competing operational demands from local authorities, clan militias, and armed non-state actors while managing restricted access to legal support and donor funding.

2.3 | Protection from Interference

The legal framework governing civil society’s operational environment was rated as disabling for the 2025–2026 reporting period. This marks a clear negative shift from the enabling rating assigned in 2025 and reflects a less favourable environment for civil society operations in Somalia. The deterioration is driven by a systemic governance pattern where weak legal safeguards, expansive security powers, and fragmented governance arrangements combine to undermine civil society autonomy. State authorities routinely invoke national security concerns, counter-terrorism narratives, and intelligence frameworks to legitimise sweeping restrictions on civic expression and organisational monitoring. While constitutional guarantees—such as Article 16 of the [Provisional Constitution of Somalia](#) and Article 32 of the Somaliland Constitution—formally recognise rights to association and expression, these protections are systematically overridden by broad, outdated public order statutes that fail to offer meaningful judicial safeguards.

Legal protections against arbitrary dissolution remain structurally inadequate across federal and regional jurisdictions. Under Article 36 of the [Somaliland Public Order Law Article](#) and Article 61 of the federal Public Order Law No. 21/1963, administrative and security committees possess broad discretion to initiate organisational deregistration or dissolution on ambiguous national security and public order grounds, as highlighted in country analyses by the [ICNL Civic Freedom Monitor](#). These grounds fail to meet international human rights standards because they lack clear statutory definitions, leaving civil society vulnerable to executive abuse. Procedural protections are virtually absent, as the legal framework does not establish mandatory advance notice periods, transparent evidentiary burdens, or independent judicial oversight prior to dissolution. Furthermore, there are no statutory appeal mechanisms, specialised administrative tribunals, or formal judicial review pathways dedicated to challenging state decisions, leaving organisations facing summary suspensions or deregistration orders without due process or accessible legal remedies.

The regulatory framework contains severe gaps regarding safeguards against intrusive state interventions. Current statutes fail to define statutory limits on official discretion or establish regulatory safeguards against the misuse of monitoring powers. Executive ministries and regional security boards exercise unmonitored inspection authority, demanding immediate access to internal financial ledgers, staffing rosters, and beneficiary databases without requiring judicial warrants or demonstrable probable cause, as highlighted in administrative warnings published by the [Somaliland Standard](#). Audit procedures are frequently weaponised as political tools to pressure civil society organisations conducting sensitive anti-corruption or human rights research.

Interference manifests through both formal legal channels and informal discretionary practices. Formally, old penal statutes—such as Article 215 for subversive propaganda and Article 269 for insulting public bodies—are selectively deployed alongside administrative directives to criminalise independent civic activity. Informally, state security actors enforce unwritten rules that severely hinder field activities. Civil society organisations implementing programmes in high-risk zones are routinely compelled to rely on state security personnel and pay mandatory "cost-recovery" escort fees that drain organisational budgets, compromise institutional neutrality, and force groups to restrict field access.

Field evidence documents a clear worsening trend in state interference over the reporting period, driven by political instability and tightening security oversight. Beyond attacks on media workers, non-governmental organisation operations have been directly targeted. Community organisations, such as those monitored by the [Peace Action Society Organization for Somalia](#), have experienced programme suspensions, increased taxation demands, and arbitrary investigations following government inspections. On 8 May 2026, National Intelligence and Security Agency officers and police forces raided a venue in Mogadishu, detaining and assaulting media and civil society defenders, including representatives from the [Somali Journalists Syndicate](#), as documented by the [International Press Institute](#) and the [Horn Observer](#). Broad security measures, such as the [National Civilian Protection Policy](#), have failed to curb executive interference.

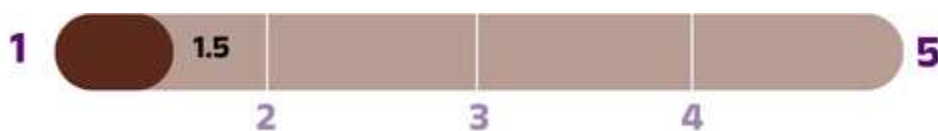
Vulnerability to state interference, surveillance, and arbitrary sanctions is heavily structured along gender, social, and regional lines. Women Human Rights Defenders and women-led organisations face targeted digital surveillance, socio-cultural threats, and intrusive ministry scrutiny when addressing gender-based violence or political inclusion, as documented by [Women in Media Somalia](#) and the [Coalition of Somali Human Rights Defenders](#). Persons with disabilities and youth networks encounter systemic exclusion and disproportionate compliance barriers, lacking the resources to navigate complex state inspections. Clan minorities and internally displaced person collectives lack political protection and legal representation,

leaving them vulnerable to arbitrary eviction, land rights interference, and unmonitored inspections by local authorities. Finally, rural and grassroots organisations operating in contested or conflict-affected regions encounter severe dual pressures from competing state officials, regional security boards, and non-state armed actors, leaving them operating entirely without legal protection or structural recourse, as noted in regional civic space studies by [Hivos](#) [EuSEE](#).

PRINCIPLE SCORE

3. Accessible and Sustainable Resources

Score:



During the 2025–2026 operational cycle, the resource environment for Somali civil society deteriorated into acute precarity. This downturn was triggered by major international aid cutbacks, including a global freeze on US humanitarian funding and a structural 47% reduction in the UN Humanitarian Needs and Response Plan (HNRP) target requirements—dropping from \$1.42 billion down to \$852 million. Compounding this resource crunch, the international system effectively excluded Somalia from critical pooled funding channels. The remaining, heavily reduced funding streams are consistently routed directly to UN bodies and international non-governmental organisations (INGOs), leaving local civil society organisations (CSOs) structurally isolated. Local groups are forced into a highly unstable, short-term sub-granting cycle that provides no core institutional funding, strips them of financial flexibility, and threatens their survival as independent operations.

3.1 | Accessibility of Resources

The accessibility of financial and material resources for civil society remained rated as fully disabling in Somalia during the 2025-2026 reporting period, unchanged from the rating assigned in the 2024-2025 assessment. This continued rating reflects persistent structural and systemic barriers that severely constrain local CSOs from directly accessing, managing, and sustaining the financial and material resources necessary for their operations and long-term sustainability. A critical distinction exists between overall humanitarian resource availability in Somalia and the structural accessibility of those resources for domestic civil society actors. While international funding continues to flow into the national emergency framework, tracking data from the [OCHA Financial Tracking Service for Somalia](#) indicates that primary grants remain concentrated among multilateral United Nations agencies and major international non-governmental organisations (INGOs). Somali frontline CSOs are largely excluded from

primary allocations, serving primarily as sub-grantees or downstream implementation partners. Sectoral coordination platforms, such as the [Somalia Non-State Actors Platform \(SONSA\)](#) and the [Somaliland Non-State Actors Forum \(SONSAF\)](#), document that this dynamic creates a severe localisation gap. Local entities absorb high operational and security risks in field implementation without securing direct access to institutional overheads, core flexible grants, or long-term organisational development funding. Domestic philanthropy and private corporate giving mechanisms remain underdeveloped, leaving the civil society ecosystem almost entirely dependent on external donor funding streams.

Government regulations and statutory compliance frameworks further restrict resource access for smaller, domestic organisations. Regulatory requirements imposed by federal and regional authorities mandate extensive administrative clearances, project pre-approvals, and fee payments prior to programme implementation. Compounding these hurdles, registration and operational renewal fees—maxing out at USD 500 at the federal level and up to USD 1,000 in regional jurisdictions such as Jubaland—impose significant financial burdens on grassroots groups. State authorities require local organisations to submit complex financial compliance documentation and obtain project alignment approvals through the [Ministry of Planning, Investment and Economic Development](#). These regulatory procedures often delay programme startup dates and penalise smaller groups that lack full-time legal or administrative staff.

Systemic information asymmetries and restrictive donor application processes reinforce resource concentration. Strategic donor briefings and funding calls are predominantly managed through international coordination hubs in Mogadishu or regional offices in Nairobi, limiting timely access to information for rural and subnational CSOs. Major institutional calls for proposals—such as those issued through the [Global Community Engagement and Resilience Fund \(GCERF\)](#) or low-value grant mechanisms managed by [UNDP Somalia](#)—require dual legal registration at both Federal Member State and federal levels, established grant track records, and mastery of online procurement portals. Application standards mandate sophisticated proposal drafting in English, rigid logical frameworks, complex risk matrix models, and multi-tiered due diligence verification. Somali CSOs frequently face capacity constraints in meeting these stringent requirements due to limited resources for dedicated grant-writing, specialised financial management software, and institutional audit systems. Donors rarely fund the core administrative or operational overheads of local sub-grantees, creating a recurring cycle where local groups lack the institutional capital required to upgrade their financial compliance systems to compete for direct primary grants.

Financial infrastructure and banking constraints impose severe barriers on domestic financial transfers and international grant receipts. The national financial sector continues to operate under de-risking policies enforced by global banking institutions, resulting in a deficit of direct correspondent banking relationships for Somali financial institutions. Weak national identification frameworks and heightened [Know Your Customer \(KYC\) requirements](#) delay incoming international transfers, leaving local sub-grantees vulnerable to transaction freezes and extended administrative holds. Additionally, CSOs encounter unstandardised state and municipal taxation obligations.

While primary non-profit activities are nominally exempt from income tax under [the Non-Governmental Organisations Act, 2019](#) (Article 21), local authorities routinely apply discretionary municipal levies, mandatory administrative service fees, and local payroll withholdings, increasing operational costs for organisations conducting field distributions.

The combined impact of global humanitarian aid contractions throughout 2025 and 2026 has intensified these pre-existing structural barriers. Mid-2026 data from the [OCHA Financial](#)

[Tracking Service](#) shows that the Somalia Humanitarian Needs and Response Plan reached only 30.6% funding coverage against required targets, creating a wide deficit across key operational clusters. This reduction in overall resource availability has compressed the sub-granting pool, accelerating competition between INGOs and local responders. Field monitoring published by [CARE International on ReliefWeb](#) notes that severe resource shortfalls have forced local sub-grantees to suspend localised emergency operations, including cash assistance programmes, mobile health outreach, and clean water trucking networks across regions such as Galmudug, Puntland, and Lower Juba.

Resource accessibility barriers impact civil society unequally across gender, social, and geographic lines. Women-led organisations face compounded exclusion, as they are less likely to hold direct access to international donor networks and face greater difficulty meeting due diligence requirements, despite playing vital frontline roles in community assistance, as documented by local networks like [Women in Media Somalia \(WIMI\)](#) and the [Coalition of Somali Human Rights Defenders](#). Operational reporting by frontline entities, such as the [Peace Action Society Organization for Somalia \(PASOS\)](#) demonstrates that community-based organisations serving displaced populations, youth collectives, and minority-led groups are systematically locked out of direct funding pools due to strict overhead restrictions and complex portal registration procedures. Disability-rights organisations encounter institutional exclusion from main funding streams, rarely receiving dedicated allocation lines or accessible donor information platforms, as noted in legal rights assessments by the [ICNL Civic Freedom Monitor](#). Rural CSOs and organisations representing internally displaced persons (IDPs) face the most severe barriers, as geographical isolation, limited internet connectivity, and ongoing conflict restrict their ability to participate in urban-based donor consultations or satisfy complex financial verification protocols.

3.2 | Effectiveness of Resources

The effectiveness of resources available to CSOs remained rated as disabling during the 2025-2026 reporting period, maintaining the same rating assigned in the 2024-2025 assessment. This indicates that, despite the availability of some resources, significant barriers continue to limit their effective utilisation in addressing organisational priorities and sustaining long-term impact. Donor funding remains the main external resource available to Somali civil society organisations, yet its effectiveness is shaped primarily by the modalities through which it is provided rather than by absolute volume. Donors generally maintain constructive working relationships with CSOs, including media and women-led organisations, and do not apply overt discrimination. However, the design of funding instruments frequently prioritises upward accountability over programmatic responsiveness and local decision-making authority. Over the reporting period, overall resource effectiveness has stagnated, as heavy administrative compliance regimes, state-level regulatory oversight, and donor-driven thematic shifts continue to constrain the operational autonomy of domestic actors.

Compliance requirements—including detailed financial reporting, strict due diligence matrices, monitoring frameworks, and complex risk-safeguarding standards—are intended to ensure transparency and manage fiduciary risk. In practice, these conditions generate substantial administrative burdens, particularly for smaller organisations with limited institutional capacity. Staff time and resources are diverted from direct programme delivery to meet reporting obligations and complex procurement procedures that often exceed the scale of the grants themselves. This creates a structural tension between donor accountability systems and the operational effectiveness of the resources transferred, systematically marginalising grassroots entities that possess deep community trust but lack dedicated compliance departments.

Funding remains largely donor-driven, creating persistent challenges around alignment with local priorities. CSOs frequently adapt organisational priorities, terminology, and project designs to align with external thematic preferences, such as short-term governance or counter-extremism benchmarks. While these areas are relevant, the resulting misalignment with self-identified community needs reduces the relevance and cumulative impact of interventions. Operational tracking by the [Somalia Non-State Actors Platform \(SONSA\)](#) and the [Somaliland Non-State Actors Forum \(SONSAF\)](#) indicates that many organisations function primarily as implementers of externally defined programmes rather than as autonomous actors setting strategic direction. This pattern aligns with findings on the structural “NGO-isation” of Somali civil society, where donor mandates shape organisational behaviour more strongly than local community demand.

Flexibility varies significantly across instruments. Some donors allow mid-project adjustments in response to security changes or emerging humanitarian needs, enabling adaptive management. Many mechanisms, however, retain fixed designs, line-item earmarks, and short project cycles that limit the ability of CSOs to adjust during localised security conflicts or climate shocks. Where international NGOs and UN agencies act as intermediaries, domestic organisations are commonly subcontracted with constrained budgets and reduced influence over programme design and resource allocation. This intermediary model distances original funders from operational realities, dilutes local ownership, and omits the flexible overhead capital required for domestic CSOs to build permanent institutional infrastructure or retain key staff.

These dynamics illustrate that shortfalls in localisation under the [Grand Bargain Framework](#) are not merely technical funding gaps; they are questions of power-sharing and governance within the aid system. Direct funding to local and national actors remains limited, while decision-making authority continues to rest predominantly with international intermediaries and foreign donors. The result is that available resources are often less effective precisely where local knowledge, access, and legitimacy are strongest.

Government regulatory frameworks and administrative controls further restrict how CSOs operationalise allocated capital. Federal and state authorities enforce strict oversight mechanisms, requiring CSOs to obtain formal project alignment approvals and activity clearance letters from the [Ministry of Planning, Investment and Economic Development](#) prior to drawing down project funds. Regional state administrations regularly monitor sub-grant expenditures and attempt to influence local hiring and procurement rosters, directly impinging on CSOs' operational independence. Furthermore, municipal authorities apply unstandardised administrative service fees and local payroll withholdings, reducing net operational budgets without providing corresponding security or infrastructural support.

Security-related responsiveness remains highly uneven across funding mechanisms. Operational reporting from frontline groups, such as the [Peace Action Society Organization for Somalia \(PASOS\)](#) and the [Somali Journalists Syndicate \(SJS\)](#), highlights that while local actors hold a distinct comparative advantage in accessing high-risk rural areas through established clan networks, systematic donor measures to mitigate those risks or share risk equitably remain limited. Foreign donors rarely provide dedicated security overheads, flexible risk-mitigation funds, or adjusted reporting timelines for security-induced delays, effectively transferring physical and operational liabilities downstream to local partners.

The structural mechanics of donor administration affect civil society actors unevenly across gender, social, and geographic lines. Women-led organisations suffer from short-term, project-based micro-grants that exclude core administrative costs or security allowances, despite

managing high-risk gender-based violence protection initiatives, as documented by [Women in Media Somalia \(WIMI\)](#) and rights monitors like the [Coalition of Somali Human Rights Defenders](#). Disability-rights and youth-led collectives are systematically excluded from primary grant eligibility due to rigid criteria requiring years of audited financial statements and complex management systems, as noted in legal assessments by the [ICNL Civic Freedom Monitor](#). Minority-led organisations lack representation within urban donor coordination hubs in Mogadishu and Nairobi, resulting in structural under-funding for marginal clan groups and displaced communities. Finally, rural CSOs absorb the highest operational and transport costs when navigating insecure or remote territories, yet receive lower proportional overhead support than urban-based entities.

Positive counter-examples demonstrate that different modalities produce different outcomes. Flexible, multi-year support provided to initiatives such as [Bilan Media](#) (through the EU-UNDP Somali Women Media Project) has enabled local leadership, editorial independence, and sustained output. These cases indicate that effectiveness is determined less by the volume of resources than by the degree of autonomy, flexibility, and genuine partnership built into the funding relationship.

In summary, current funding modalities constrain the effectiveness of resources available to Somali civil society by prioritising upward accountability, limiting local decision-making power, and maintaining intermediary structures that reduce ownership. Addressing these design features—rather than simply increasing funding volumes—is essential if resources are to support autonomous, responsive, and contextually relevant civic action.

3.3 | Sustainability of Resources

Compared with the [2025 country focus](#), which already assessed sustainability of resources as disabling and identified a narrow, short-term donor base with limited self-reliance, conditions have deteriorated in 2025–2026. The sharp contraction in external assistance, particularly measures linked to the early-2025 USAID stop-work orders, has further reduced organisational viability without corresponding development of domestic financing instruments or diversified revenue streams.

Somali civil society organisations continue to rely predominantly on short-term, project-based foreign grants. Domestic resource mechanisms remain limited: there are no established state [public-funding programmes](#), functional corporate philanthropy frameworks, or tax incentives for community donations. Local actors receive [less than 3 percent](#) of humanitarian funding directly. This structure leaves most organisations exposed to shifts in donor priorities and without buffers to maintain core operations during interruptions.

Diversity and reliability of funding sources are low. Humanitarian grants predominate, while multi-year development or rights-based core support is scarce. Donor concentration remains high. Prior to 2025 the United States provided a substantial share of overall flows; surveys indicated that [over 60 percent](#) of NGOs operating in Somalia relied on USAID or the Bureau for Humanitarian Assistance as a leading donor. When that support contracted, organisations with narrower funding bases experienced more severe shortfalls than those able to access multiple streams or pooled mechanisms such as the [Somalia Humanitarian Fund](#). Better-connected urban or national NGOs sometimes secure broader portfolios; smaller, rural, or specialised groups rarely do.

Dependency on unpredictable external funding produces recurring cycle gaps. Grants are typically short-term and earmarked. Organisations report interruptions between successive projects, delayed disbursements, and abrupt stop-work orders that result in periods without income. Transition gaps between grants are common. Few CSOs maintain unrestricted

reserves or formal risk-management strategies sufficient to bridge these intervals. Adaptation has primarily taken the form of scaling back activities, placing staff on unpaid leave, or closing field offices rather than shifting to alternative models, according to an [African CSO survey](#).

These conditions undermine institutional resilience. Local and national organisations experienced widespread staff reductions and office closures in late 2025, with only a minority expressing confidence in remaining operational beyond mid-2026 without new support, as shown in the [NGO contraction analysis](#). Skilled personnel frequently migrate to international organisations offering more stable contracts, eroding institutional memory and technical expertise. Remaining staff concentrate on short-term grant-seeking, reducing capacity for sustained advocacy or monitoring. Strategic planning is constrained: multi-year organisational strategies, investment in systems and leadership development become secondary to immediate cash-flow pressures. Organisations without direct donor relationships face higher survival risks, highlighting a persistent localisation gap between policy commitments and practice documented in the [Oxfam localisation study](#).

Self-reliance mechanisms remain underdeveloped. Membership contributions, community fundraising, social-enterprise activities, and private-sector partnerships generate only marginal income for most groups. Legal restrictions in [Puntland and Somaliland](#) on NGO commercial activities, together with the absence of a clear public-benefit or tax-exempt status at federal level, limit legitimate income-generation options. Diaspora giving and volunteer mobilisation exist but are not systematically channelled into organisational reserves. Consequently, few CSOs have built independent revenue streams capable of sustaining core functions during donor contractions, as noted in the [2025 country focus](#).

Gender equality, disability and inclusion dimensions are marked. Women-led organisations, youth groups, disability-rights networks, minority-clan associations, and rural or grassroots entities typically operate with thinner reserves, weaker direct-donor access, and greater reliance on short-term sub-grants. These organisations are frequently the first to lose funding when upstream donors freeze or redirect resources, and they face steeper barriers to multi-year or flexible support. Differential access to networks, training and unrestricted funding compounds the sustainability gap.

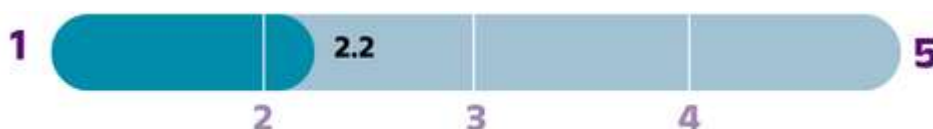
Key incidents during the reporting period illustrate organisational rather than purely service-delivery effects. The early-2025 USAID-related stop-work orders and subsequent ODA reductions produced immediate contract losses, payroll interruptions and capacity erosion among local implementing partners, according to [SIDRA analysis](#) and the [ODA cuts paper](#). Reductions in research and multi-year community grants limited the ability of domestic institutes to retain staff and maintain evidence pipelines. Rising operational costs linked to the security transition further strained already limited budgets, as reflected in the [World Bank update](#).

Overall, sustainability has worsened relative to the previous assessment period. The principal drivers are global ODA realignments, continued concentration of funding in a limited set of bilateral sources, predominance of short-term project modalities, and the absence of domestic financing instruments or enabling legal frameworks for self-reliance. While some pooled funds have modestly increased the share of resources reaching national NGOs, the long-term viability, staffing stability and strategic capacity of the majority of civil society organisations—particularly smaller and marginalised ones—have declined.

PRINCIPLE SCORE

4. Open and Responsive State

Score:



This section assesses the Somali government’s openness, transparency, and accountability toward civil society actors in 2026, focusing on how CSOs are engaged, informed, and recognised in governance processes. Research findings reflect a system where formal commitments to openness remain severely compromised by institutional fragmentation and a deepening political crisis. In March 2026, the Federal Parliament formally adopted a new permanent constitution, replacing the 2012 Provisional Constitution. While the new charter introduces provisions on the separation of powers and asset declarations, its adoption lacked inclusive consensus, sparking severe pushback from Federal Member States like Puntland and Jubaland, and plunging the country into a constitutional crisis. State–civil society engagement remains limited, inconsistent, and largely symbolic. While consultation mechanisms exist on paper, meaningful state responsiveness is weak, leaving CSOs with minimal influence over critical legislative and political decisions.

4.1 | Transparency

The openness of the state to civil society was rated as disabling during the 2025-2026 reporting period, representing a slight improvement from the 2024-2025 assessment. While modest progress was recorded in areas such as budget transparency and the digitisation of legal information, the overall transparency environment remains constrained. Although the right to access information is constitutionally recognised, implementation remains weak, with limited proactive disclosure, ineffective request mechanisms, and inadequate oversight. As a result, civil society’s ability to contribute to transparent and accountable governance continues to be restricted.

Somalia's [Provisional Constitution](#) recognises the right of access to information. Article 32 states that every person has the right of access to information held by the state and requires Federal Parliament to enact a law to give effect to this right. In the absence of a comprehensive federal Right to Information (RTI) statute, the constitutional guarantee remains largely unimplemented. No dedicated access-to-information law establishes clear publication obligations, request procedures, timelines, or independent oversight.

The [Official Information Bill](#) (OIB), approved by the Council of Ministers in March 2024 and submitted to the House of the People, was presented as a framework to operationalise the right. Civil society and media organisations, including [DefendDefenders](#), the [International Federation of Journalists \(IFJ\)](#) and the [National Union of Somali Journalists \(NUSOJ\)](#), have raised substantial concerns. The Bill [contains](#) overly broad exemptions based on “confidentiality” and “national security” without adequate harm tests, public-interest overrides or independent judicial review. Its drafting process lacked meaningful public consultation, contrary to international standards and the African Union Model Law on Access to Information. As of mid-2026 the Bill remains under parliamentary consideration; its current form risks entrenching rather than reducing secrecy.

Public institutions are under no consistent legal obligation to proactively publish key categories of information—draft laws, regulations, budgets, audit reports, procurement awards or policy documents—in accessible formats or on central digital platforms. Disclosure practices are fragmented and uncoordinated. Individual federal offices occasionally release information through websites or social media, yet these actions do not constitute institutional repositories. At the local and federal member state levels, transparency is weaker still. The [Open Budget Survey](#) records a modest improvement in budget transparency (score of 39/100, up from 37 in 2023), driven mainly by the online publication of a Citizens Budget. Many core budget documents, however, remain unavailable, published late, or produced only for internal use. Recent efforts to digitise legal archives by initiatives like the [Legal Archives Center](#) represent a positive step toward public access to enacted legislation, but they do not yet extend systematically to drafts, audits or procurement data.

In practice, access to information depends heavily on personal and informal networks rather than formal administrative procedures. No standardised request mechanisms, response timelines, fee structures or fee-waiver provisions for vulnerable groups exist at the federal level. Citizens and CSOs seeking strategic documents—draft bills, procurement records or expenditure data—must often rely on individual contacts within ministries or parliament. This informal system disproportionately advantages well-connected urban actors and disadvantages grassroots organisations, rural communities, women, youth, minority clans, persons with disabilities and internally displaced persons. Language barriers (limited availability of materials in Somali dialects or accessible formats), low digital literacy, restricted internet access outside major cities, and physical distance from government offices further compound exclusion for these groups.

Protections against arbitrary denial remain weak. There is no independent information commission or equivalent oversight body empowered to hear appeals, impose sanctions or order disclosure. Judicial review is limited by capacity constraints and perceptions of politicisation. In the absence of clear procedural safeguards, refusals on vague security grounds face little effective challenge.

These structural deficiencies directly constrain civic participation. CSOs and journalists cannot reliably monitor public expenditure, track legislative processes or hold institutions accountable. Policy engagement is hampered when draft laws advance without timely public access. Citizen

participation is reduced to reactive or informal channels, undermining the ability of civil society to contribute evidence-based input or to represent community interests. In areas under Al-Shabaab control, access to official information is effectively non-existent.

4.2 | Participation

The extent to which the government allows civil society to participate in decision-making remained rated as partially enabling during the 2025-2026 reporting period, unchanged from the 2024-2025 assessment. Civic participation mechanisms continue to provide civil society with opportunities for consultation and engagement, particularly through high-level forums and donor-supported initiatives. However, these platforms generally offer access rather than influence, as civil society input is not systematically incorporated into final decisions. Participation therefore remains dependent on political goodwill and ad hoc processes rather than decision-making.

The Provisional [Constitution of Somalia](#) (and subsequent constitutional texts) affirms rights to organise, participate in meetings, demonstrate peacefully, and present petitions to state institutions ([Art. 20](#); reinforced by [Art. 16](#) and [Art. 22](#)). These provisions create a normative basis for civic engagement. However, no comprehensive statutory framework mandates structured consultation of civil society in law-making, policy design, or oversight processes. Engagement therefore remains discretionary rather than obligatory. Strategic interaction with government institutions is typically sporadic and frequently relies on personal or institutional relationships rather than formal, predictable procedures.

In practice, civil society actors are consulted in selected national processes. Examples during the reporting period include platforms such as the [National Consultative Forum](#) (NCF) held in Mogadishu in June 2025; the 9th Annual Forum for Ideas ([AFI 2025](#)) held in Dhusamareb under the auspices of the [Heritage Institute for Policy Studies \(HIPS\)](#), which brought together more than 560 political, academic, religious, business and civic actors and produced a joint communiqué; and consultations led by the [Somalia Non-State Actors Platform \(SONSA\)](#) on national strategy frameworks for democratisation and good governance. Civil society networks have also contributed analysis and dialogue facilitation around electoral models and constitutional review. In certain sectors—particularly women’s empowerment and humanitarian response—CSOs exercise comparatively greater influence because of specialised expertise and donor leverage.

Despite these platforms, participation is predominantly consultative and often symbolic. Reviews of processes such as the Official Information Bill and elements of the [constitutional review process](#) indicate that civil society recommendations are seldom tracked or demonstrably reflected in final legislative or policy texts. Consultations are frequently called at short notice, limiting the ability of organisations to prepare substantive input. Follow-up mechanisms that would require public institutions to report how CSO contributions were considered remain largely absent. As a result, many actors experience engagement as procedural rather than transformative.

Structural exclusion further limits effectiveness. National dialogues are dominated by larger, well-resourced, Mogadishu-based organisations with established networks and donor backing. Smaller community-based organisations, rural networks, youth collectives and women-led grassroots groups remain underrepresented. Geographic, economic and capacity barriers reinforce an urban-centric pattern: proximity to decision-making centres, ability to travel, and organisational resources determine who can participate. Informal discrimination—

political alignment, clan dynamics and perceptions of “donor-driven” agendas—also shapes access.

While formal invitations sometimes extend to women and, more recently, disability representatives, persons with disabilities, minority and marginalised clans, IDP-led organisations and rural populations face compounded barriers. These include limited physical and digital accessibility of venues and materials, lower organisational capacity, security constraints, language and literacy gaps, and the absence of targeted outreach or reasonable accommodation. The practical consequence is that the priorities of these groups are less likely to shape national agendas on security, public finance, constitutional reform or service delivery, reinforcing existing inequalities in representation and influence.

Participation mechanisms therefore exist and are utilised, yet they remain weakly institutionalised. They depend heavily on the initiative of particular political leaders or external partners rather than on sustained, legally grounded systems with clear frequency, early-stage involvement, inclusive selection criteria and accountability for outcomes. Trend analysis shows continuity with previous years: high-visibility forums continue to convene and occasionally mediate political tensions, while structural inclusivity and demonstrable policy influence have not advanced significantly. Without formalisation of consultation obligations, equitable representation requirements and transparent feedback loops, civic participation will continue to offer access for a relatively narrow set of actors while leaving broader civil society—particularly marginalised and grassroots voices—with limited capacity to shape governance outcomes.

4.3 | Accountability

Accountability of the state to civil society remained rated as fully disabling during the 2025-2026 reporting period, unchanged from the previous assessment cycle, and continues to be the weakest dimension of the Open and Responsive State category in Somalia. Although formal oversight institutions and public financial management mechanisms have expanded, these developments have translated into limited government responsiveness to civil society concerns, weak follow-up on consultation outcomes, and few effective avenues for civic actors to monitor, challenge, or influence government performance. As a result, an accountability paradox persists: while the number of audits, oversight processes, and technical accountability systems has increased, meaningful accountability to civil society remains largely absent. Government rarely explains how civil society input has been used in decision-making. There is no legal obligation for public institutions to publish consultation outcomes, provide reasoned responses to CSO recommendations, or document why specific proposals were accepted or rejected. Feedback is seldom publicly documented. When consultations occur (as noted in Section 4.2), the process typically ends with the submission of views; subsequent tracking, justification or public reporting of how those views shaped final decisions is absent. This absence of closed feedback loops renders participation largely one-directional and undermines trust.

Spaces for follow-up and monitoring are correspondingly weak. Civil society organisations lack institutionalised channels to track government commitments arising from national forums, policy dialogues or legislative processes. Formal audit institutions, notably the [Office of the Auditor General of Somalia \(OAGS\)](#) and counterpart bodies in federal member states, have increased output—publishing specialised [financial audit reports](#) that expose unsupported expenditures and reconciliation gaps in public and aid-related funds. Independent monitors such as the [Transparency Somalia Initiative](#) have documented that only a small fraction of flagged irregularities proceed to formal legal or administrative consequences. These audits

remain largely internal or executive-facing exercises; they do not systematically create openings for CSOs to engage with findings, demand remedial action or participate in oversight follow-up.

Independent civic monitoring faces additional constraints. While state institutions tolerate (and publicise) official audits, independent scrutiny by journalists, human rights organisations and advocacy CSOs is more restricted. Regulatory tools and operational directives have at times been used to constrain public-interest monitoring, including through registration pressure, financial freezes or restrictions on reporting. Specialised administrative grievance procedures that would allow CSOs to challenge arbitrary sanctions, licence denials or operational interference remain underdeveloped. The [Independent Anti-Corruption Commission \(IACC\)](#), established under [Anti-Corruption Commission Law No. 12/2019](#), has faced operational and appointment delays that concentrate oversight authority within the executive, leaving civic actors without a fully functional independent institutional interlocutor.

These gaps directly limit the ability of civil society to monitor government performance and commitments. Access to timely information (already constrained under the transparency dimension) compounds the difficulty. Without clear response mechanisms, documented feedback or protected spaces for follow-up, CSOs operate with limited leverage once consultations conclude.

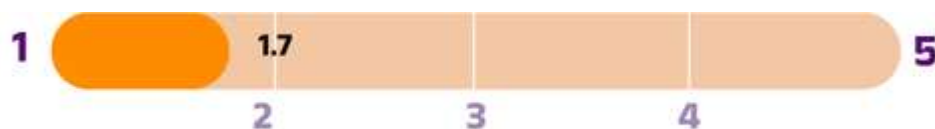
Women-led organisations, youth groups, disability-rights organisations, rural community structures, minority-clan associations and IDP-led initiatives face heightened obstacles in accessing oversight institutions, filing complaints or participating in monitoring processes. Barriers include geographic distance from capital-based offices, limited organisational capacity and resources, lower digital and literacy access, security constraints, and the informal networks that often mediate contact with officials. Consequently, the priorities and experiences of these groups are less likely to surface in accountability processes, reinforcing exclusion from the very mechanisms intended to hold power to account.

Trend analysis indicates stagnation rather than improvement or deterioration. Technical public financial management systems and the volume of audit publications have advanced with international support. Enforcement, institutional independence (particularly of the [IACC](#)), responsiveness to civil society input, and protected civic monitoring space have not kept pace. The persistent low score on global governance indices—such as [Transparency International's Corruption Perceptions Index](#)—is consistent with this pattern of structures without corresponding outcomes. Without closing the feedback loop between consultation and decision-making, establishing independent grievance and oversight pathways, and ensuring equitable access for marginalised civic actors, formal accountability architecture will continue to coexist with limited practical accountability to civil society.

PRINCIPLE SCORE

5. Supportive Public Culture and Discourses on Civil Society

Score:



Supportive Public Culture and Discourses in Somalia remained constrained during the 2025-2026 reporting period, characterised by polarised public discourse, weak civic engagement, and persistent barriers to inclusive participation. While civil society continues to play a vital role in service delivery, humanitarian response, and community support, its broader governance, accountability, and advocacy functions often face scepticism, politicisation, and hostility from both state and non-state actors. Public trust in civil society remains uneven and rarely translates into meaningful civic participation, as insecurity, political uncertainty, state restrictions, extremist intimidation, and limited civic education discourage citizens from engaging in public affairs. At the same time, longstanding inequalities continue to exclude women, youth, persons with disabilities, minority clans, internally displaced persons, and other marginalised groups from decision-making processes and civic life. Although some policy and institutional initiatives aimed at promoting inclusion remain in place, substantive progress has been limited, leaving public discourse, civic engagement, and equality of participation collectively insufficient to support a fully enabling environment for civil society.

5.1 | Public Discourse and Constructive Dialogue on Civil Society

Public discourse on civil society in Somalia remained rated as disabling during the 2025-2026 reporting period, maintaining the rating assigned in the previous assessment cycle. The discourse continues to be characterised by selective, polarised, and at times adversarial narratives that undermine public trust and limit constructive dialogue between civil society, government, and other stakeholders. As a result, the broader public environment remains insufficiently supportive of civil society's role in governance, accountability, and development.

[Government officials and state-aligned media](#) frequently portray organisations engaged in advocacy, human rights monitoring and anti-corruption work as foreign-driven or politically

subversive. Service-delivery and humanitarian CSOs generally attract greater tolerance. This framing functions as a [tool of exclusion](#). By associating accountability-focused civil society with threats to national stability or external interference, official narratives delegitimise independent oversight, reduce public willingness to engage with critical voices, and narrow the perceived legitimacy of civic monitoring roles.

Narratives about civil society remain uneven. While some public commentary acknowledges the practical contributions of CSOs in service provision and crisis response, rights-based and governance-oriented organisations are more commonly linked to [external agendas](#) or political opposition. Limited civic education and the absence of consistent official recognition of the full spectrum of civil society functions reinforce scepticism among segments of the population. Public attitudes consequently remain divided, with higher levels of trust directed toward apolitical or humanitarian work and lower levels of trust toward organisations that question policy or demand transparency.

Patterns of dialogue reflect and reinforce this polarisation. Opportunities for respectful, inclusive and evidence-based exchange between state institutions and civil society are constrained. Criticism is more often met with defensive or adversarial responses than with substantive engagement. Although high-profile consultative platforms continue to convene, they rarely generate sustained collaborative problem-solving on contested issues of governance, rights or resource allocation. [Increasing polarisation](#) has reduced the space for constructive interaction between government and civil society, encouraging many civic actors to adopt self-censorship or to prioritise lower-profile, less contested programming in order to preserve operational space.

Developments from mid-2025 onward illustrate the practical consequences of these discursive patterns. The [CSHRD 2025 report](#) documented 112 human rights defenders targeted during the year, including through cyber-attacks, doxxing, coordinated online harassment and surveillance. Subsequent [quarterly reporting](#) recorded continued exclusion of opposition-affiliated civil society actors from consultations, administrative harassment and public vilification in the lead-up to electoral processes. [Intelligence agency interventions](#) against journalists and activists covering sensitive topics intensified in 2026, further signalling elevated risk for critical civic voices. At least [41 journalists](#) were targeted by security personnel in a concentrated period in 2025 alone.

These discursive dynamics produce differentiated effects on marginalised groups and the organisations representing them. Women-led organisations and women human rights defenders encounter heightened stigma, including sexualised online abuse intended to silence participation in public debate. Minority clan associations face contested identity narratives that limit their public legitimacy. Organisations representing persons with disabilities confront persistent social stigma that restricts visibility in constructive discourse. Youth and rural networks are frequently portrayed as peripheral or externally driven. The cumulative result is greater exclusion of these voices from public debate and reduced societal support for the issues they raise.

Polarisation has intensified, constructive dialogue opportunities have narrowed, and relations between critical civil society actors and state institutions have grown more adversarial. The continued framing of accountability-focused CSOs as threats to stability continues to [delegitimise independent oversight](#) and discourage public engagement. Without deliberate shifts in official narratives, protection of space for evidence-based exchange, and efforts to counter stigmatising portrayals of marginalised civic groups, public discourse will remain a constraining rather than enabling factor for civil society.

5.2 | Perception of Civil Society and Civic Engagement

Perceptions of civil society and civic engagement remained rated as fully disabling during the 2025-2026 reporting period, unchanged from the 2024-2025 assessment. While Somali citizens generally recognise and value the role of civil society organisations, particularly in service delivery, humanitarian assistance, and community support, this recognition has not translated into broad-based civic engagement or sustained public participation. Public trust in civil society remains uneven across sectors and communities, reflecting persistent concerns around representation, accountability, and political affiliation. As a result, civic engagement continues to be constrained, limiting the ability of citizens to participate meaningfully in public affairs and collective action.

According to the [BTI Transformation Index's 2026 Somalia Country Report](#), unresolved disputes over resource-sharing and political cohesion deeply affect how citizens view governance and civil actors. Grassroots organisations and community-based groups retain strong local legitimacy because of their proximity to communities and visible role in service delivery. In contrast, larger, urban-based organisations in Mogadishu are often met with scepticism, sometimes perceived as detached or politically compromised. Yet, even when citizens trust local civil society, they frequently choose not to engage in public advocacy or political processes. This disconnect highlights a crisis in political efficacy. Citizens largely believe they cannot influence political decisions because public participation carries extreme security risks and rarely produces visible institutional changes.

The space for organic public mobilisation remains heavily securitised, further discouraging citizen engagement. When citizens attempt to organise protests regarding inflation, land disputes, or forced evictions, the state often responds with immediate crackdowns. The [ICNL Civic Freedom Monitor updated in July 2026](#) reports that while the new constitution adopted in March 2026 formally guarantees freedoms of expression and assembly, these rights are frequently curtailed by restrictive legislation and police actions. Journalists, human rights defenders and citizens face harassment, arbitrary detention, and violent dispersal when attempting to mobilise. For example, [Human Rights Watch's 2025 World Report](#) noted that tens of thousands of people were forcibly evicted in Mogadishu, and authorities systematically suppressed the resulting demonstrations. The ongoing political crisis, marked by the expiration of Parliament's mandate in April 2026 and subsequent electoral uncertainty, has deepened citizen disillusionment and stalled any positive trends in civic participation.

This fragile civic space is aggressively exploited by Al-Shabaab, which systematically targets independent civic actors to prevent community participation in peacebuilding. The [Counter Extremism Project's May 2026 threat report](#) highlights that Al-Shabaab uses its centralised media networks, such as Radio al-Andalus and the Shahada News Agency, to disseminate sophisticated propaganda. Throughout early 2026, the group launched campaigns specifically designed to frame humanitarian NGOs and civil society groups as corrupt foreign entities operating against Islamic values. By painting civic engagement as a western conspiracy, Al-Shabaab deliberately creates widespread panic. Consequently, citizens avoid collaborating with civil society due to the credible fear of extremist reprisals, separating their private trust in these organisations from their willingness to be seen engaging with them publicly.

The lack of a comprehensive national civic education framework severely limits the public's ability to resist both state intimidation and extremist misinformation. Access to civic learning is highly uneven, leaving rural communities and residents of informal settlements largely without

the tools to hold institutions accountable or safely participate in democratic processes, as supported by the [BTI 2026 assessments](#). Without structured civic education, the population remains highly vulnerable to propaganda, reducing their capacity to distinguish between legitimate civil society efforts and politically motivated narratives. This educational deficit directly undermines institutional trust and ensures that civic engagement remains transactional and reactive rather than sustained.

Perceptions of civil society and the ability to participate vary drastically across different demographic and social groups. An [April 2026 analytical report on human rights in Somalia](#) and [Human Rights Watch's 2025 reporting](#) demonstrate that marginalised communities face the highest barriers to engagement. Minority clans, such as the Bantu and Midgan, are systematically excluded from traditional clan protection systems, leaving them entirely exposed to violence and discrimination with minimal political representation. Internally displaced persons, particularly women and girls, face severe risks of gender-based violence and forced evictions, preventing them from safely engaging in community organising. For these marginalised groups, the state provides no reliable legal protection, meaning their trust in civil society is often their only recourse for survival, even though their ability to actively participate in broader civic life is virtually nonexistent.

5.3 | Civic Equality and Inclusion

Civic equality and inclusion was rated as disabling for the 2025–2026 reporting period, unchanged from the 2024–2025 assessment. This is mainly driven by the continued failure to implement the long-standing 30% parliamentary gender quota, intensified targeting of women human rights defenders through cyber-attacks, smear campaigns and arbitrary arrests (as documented in the [Coalition of Somali Human Rights Defenders 2025 Annual Report](#)), and the persistent exclusion of minority clans, persons with disabilities and youth from meaningful political space. Although formal instruments such as the [National Action Plan on Women, Peace and Security](#) and state-level FGM prohibitions remain in place, these commitments have not translated into improved outcomes.

However, translating formal legal mechanisms into substantive equality remains severely blocked by deeply entrenched systemic challenges. In practice, the long-standing political agreement of a 30% political quota for women in parliament has never been realised—with representation hovering at only around 20% in recent cycles, according to [IPU data](#) and [EJS Center snapshots](#)—due to the dominance of male-controlled, patriarchal clan-based political systems and widespread local cultural resistance to women holding parliamentary office. The [SIHA Network's statements](#) on inclusive democracy note that ongoing political transitions risk further diluting women's voices rather than empowering them. Furthermore, the [2025 Assessment Report on Minority Groups in Somalia](#) underscores how [non-dominant clans](#), such as the Somali Bantu, Gaboye, and Bajuni, continue to face systemic exclusion, severe socio-economic disparities, and a total lack of representation in mainstream political decision-making. When these forms of exclusion overlap—minority women, displaced women, women with disabilities, or minority women human rights defenders—the barriers multiply, limiting not only seats at the table but also any real chance to shape policy or hold leaders accountable.

This crisis of political representation is even more pronounced in Somaliland, which has historically operated with an almost entirely “mono-gendered” legislative body. Since 2005, women have been nearly entirely excluded from Somaliland's House of Representatives, effectively sidelining more than half the population from the legislative process, a point stressed in recent analyses calling for reform. Local analysts and politicians argue that this severe exclusion represents a democratic crisis, fuelling intense pressure to introduce a mandatory 25% female quota to bypass the traditional “tribal bottleneck” of male clan elders

who view women as transient political actors, as detailed in coverage of the [push for a 25% quota](#). To combat this systemic marginalisation, civil society groups like the Siraad Initiative have held specialised forums in Hargeisa to elevate female voices, build capacity for aspiring political candidates, and demand structural reforms that challenge long-standing exclusionary norms.

Broader patterns of exclusion extend beyond gender and clan. Persons with disabilities encounter persistent physical, social, and institutional barriers to civic life; despite the existence of a National Disability Agency and recent government pledges of inclusion in constitutional consultations, access to polling stations, political debates, and decision-making remains limited, as highlighted in UNDP reporting and disability assessments. Youth, who form the majority of the population, face similar sidelining through clan hierarchies and limited formal channels for participation, even as programmes such as YOU-ACT and civic education initiatives try to expand their role in local governance and peacebuilding. Societal tolerance for diversity stays low in practice: resistance to women’s leadership, discrimination against minority clans, and stigma toward disability all reduce willingness to share political space. These attitudes are rarely measured directly in surveys, yet they surface clearly in the continued failure of quotas, the isolation of occupational minorities, and the hostility directed at those who challenge norms.

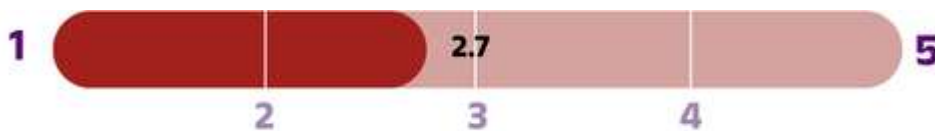
Most critically, marginalised actors who attempt to actively participate in civic life face physical risks. As documented in the [Coalition of Somali Human Rights Defenders \(CSHRD\) 2025 Annual Report](#), Women Human Rights Defenders (WHRDs) documenting gender-based violence (GBV) are subjected to disproportionate levels of cyber-attacks, online smear campaigns, and arbitrary arrests. The same report and related briefings show how these threats hit hardest at the intersections—minority or displaced WHRDs face compounded hostility. Minorities and displaced populations in informal settlements face constant forced evictions without legal recourse, while journalists who try to document these abuses are met with violence and detention by security forces. Intimidation shrinks the civic space available for anyone outside dominant power networks: when participation carries personal risk, fewer people step forward, representation stays thin, and accountability weakens. Legal gaps compound the problem; while some laws promote equality, enforcement is weak, discriminatory customary practices persist, and certain restrictions on expression and assembly indirectly limit who can safely engage.

Consequently, while formal inclusion measures exist on paper, the practical landscape for civic equality remains unequal, unsafe, and highly exclusionary. The overall trend is one of gradual policy progress—new action plans, state-level FGM bans, and targeted programmes—paired with continued stagnation in substantive outcomes. Representation numbers barely move, intersecting forms of exclusion endure, and civic space for the most marginalised stays constrained.

PRINCIPLE SCORE

6. Access to a Secure Digital Environment

Score:



Access to a secure digital environment in Somalia remained constrained during the 2025-2026 reporting period, characterised by a deterioration in digital rights and freedoms, weakening protections for digital security and privacy, and only modest gains in digital accessibility. While connectivity continued to expand through growing mobile-phone usage, the rollout of Starlink services, and the widespread adoption of mobile money platforms, these advances were overshadowed by increasing online censorship, internet disruptions, surveillance of journalists and civil society actors, and persistent cybersecurity vulnerabilities. The reporting period also highlighted significant gaps between newly adopted digital governance frameworks and their practical implementation, as weak oversight, inadequate legal safeguards, and limited avenues for redress left civic actors exposed to cyberattacks, data breaches, and intrusive state surveillance. At the same time, high connectivity costs, low digital literacy, infrastructure weaknesses, and persistent gender, geographic, socioeconomic, and other inequalities continued to limit equitable digital participation, particularly for women, youth, persons with disabilities, rural communities, internally displaced persons, and other marginalised groups.

6.1 | Digital Rights and Freedoms

Digital rights and freedoms were rated as disabling for the 2025–2026 reporting period. This marks a clear negative shift from the partially enabling rating assigned in 2025 and reflects a deteriorating environment for online expression and civic digital engagement in Somalia. The downgrade is driven by the increasing frequency of localised internet disruptions and network throttling during political standoffs (notably in Banadir in mid-2026), the expanded weaponisation of the Penal Code and national-security directives against online speech, intensified NISA digital surveillance and device seizures targeting journalists and human rights defenders, and a sustained pattern of offline retaliation for digital content—including the March 2026 crackdown on [Bajaj driver protests](#) and the May 2026 arrests of journalists covering

forced evictions (documented in the [National Union of Somali Journalists 2025 Annual Report](#)). While full nationwide blackouts remain rare, these cumulative pressures have narrowed the space for safe online civic activity.

The legal framework regulating internet freedom remains deeply ambiguous, combining formal telecommunications laws with restrictive statutory provisions that lack human rights safeguards. Under the [National Communications Act of 2017](#), the National Communications Authority holds broad regulatory power over digital networks, but the law lacks clear judicial oversight or explicit protections for online expression. Instead, state authorities frequently weaponise outdated criminal codes and national security directives to penalise digital speech. Article 219 and Article 328 of the Somali Penal Code—which criminalise "subversive propaganda" and the publication of "false, exaggerated, or tendentious news"—are consistently invoked to arrest journalists, bloggers, and activists for critical social media posts. The absence of statutory definitions for cybercrimes creates an environment of regulatory overreach, where law enforcement agencies execute arbitrary administrative takedowns without procedural transparency.

Government censorship of political content and direct surveillance of civil society organisations are widespread and escalating. State security agencies, most notably the National Intelligence and Security Agency, regularly employ digital tracking tools, mobile network monitoring, and device confiscations to surveil human rights defenders and political dissidents. Journalists covering sensitive topics—such as corruption, forced evictions, or public protests—face arbitrary detention, device seizures, and forced deletion of digital footage. Documentation from the [National Union of Somali Journalists 2025 Annual Report](#) records dozens of press freedom violations, highlighting that online political reporting directly triggers physical intimidation, arbitrary arrests, and physical retaliation by state security forces.

Private technology platforms play a significant yet flawed role in regulating Somali digital space, often exacerbating censorship through inadequate moderation and vulnerability to manipulation. Somali civil society actors and independent journalists rely heavily on Facebook as their primary publishing avenue. However, state actors and coordinated political troll networks aggressively exploit automated reporting systems on social media platforms to silence critical voices. A landmark decision by the [Meta Oversight Board on Somaliland Media Takedowns](#) revealed that Meta's automated systems and human review processes erroneously removed independent news pages and content covering socio-political affairs due to weaponised mass-reporting campaigns. Private platform operators consistently lack local language context and dedicated human rights oversight in Somalia, failing to provide transparent appeal procedures or accountability mechanisms when civil society accounts are wrongly suspended.

Online expression routinely triggers severe offline retaliation, making digital activism extremely dangerous. Journalists, anti-corruption campaigners, and political commentators who criticise public officials online are regularly subjected to arbitrary arrest, prolonged detention without trial, and targeted violence. Key incidents during 2026 underscore these risks; for instance, state security forces executed a sustained crackdown recording over 30 media violations during a [four-month period](#). Peaceful public expression was met with severe state coercion in March 2026, when police violently arrested drivers during [Bajaj driver protests](#)—including detaining a female driver for days—while physically assaulting, beating, and re-arresting reporters who covered the demonstrations. Crackdowns on digital reporting intensified in May 2026, when security forces detained journalists to suppress [eviction coverage](#) in Mogadishu, alongside the targeted arrest of independent media figures like [Abdiqani Dhulmar](#).

The digital security threats and barriers to internet access are severely compounded across gender, economic, and social lines, yet marginalised demographics remain largely omitted from national digital protection strategies. Women Human Rights Defenders and female journalists face extreme levels of gendered digital violence, including doxxing, non-consensual sharing of intimate images, and highly sexualised harassment campaigns designed to drive them out of public life. Youth activists, minority clan representatives, internally displaced persons, and rural organisations face structural digital exclusion due to high data costs, poor network coverage, and low digital literacy rates. Unlike urban civil society entities in Mogadishu, grassroots and rural groups lack access to encrypted communication tools, digital safety training, or technical defence mechanisms against cyber harassment, leaving them entirely exposed to both digital censorship and physical harm.

6.2 | Digital Security and Privacy

Digital security and privacy was rated as partially enabling for the 2025–2026 reporting period. This marks a clear negative shift from the enabling rating assigned in 2025 and reflects a less favourable environment for the protection of civic actors' digital data and communications in Somalia. Although the Federal Parliament approved the long-awaited [National Cybersecurity Law](#) on 26 January 2026—designating the National Communications Authority as the highest cybersecurity body and establishing the [Somalia Computer Incident Response Team \(SOM-CIRT\)](#)—and issued accompanying data-protection registration directives, the practical reality has deteriorated. The downgrade is driven by the continued absence of independent oversight or effective judicial remedies, the unchecked surveillance practices of the National Intelligence and Security Agency (including spyware and device seizures targeting human rights defenders), and high-profile failures such as the 2025 e-visa system breach that exposed the personal data of at least [35,000 travellers](#). These gaps between formal legislation and enforceable protection convinced the panel that the environment has become less enabling than in the previous assessment cycle.

However, independent legal scholars and digital rights advocates note that Somalia's digital arena remains characterised by high digital vulnerability and a total lack of legal recourse, as private-sector dominance and political instability have outpaced the state's capacity to protect citizen privacy. Legislative frameworks completely lack meaningful compliance mechanisms, clear legal safeguards, or independent statutory oversight, while regulatory authorities possess neither the technical inspection capabilities nor the formal enforcement powers required to audit telecommunications monopolies, evaluate data handling, and hold processors accountable. Furthermore, no functional administrative complaint procedures, regulatory investigation mechanisms, or judicial remedies exist for victims of corporate data breaches or state surveillance, as the formal justice system lacks the independence, technical expertise, and statutory authority to penalise state overreach, subpoena intelligence bodies, or offer opportunities for victims to seek financial or legal redress.

Intelligence units like the [National Intelligence and Security Agency \(NISA\)](#) operate in a complete regulatory vacuum, utilising targeted digital surveillance, wiretapping, communication interception, and commercial malware or spyware deployments—such as malicious WhatsApp phishing vectors and mobile Trojan tools—to track, intercept, and intimidate activists. This unchecked surveillance is highly gendered and targeted; the [Coalition of Somali Human Rights Defenders \(CSHRD\)](#) 2025 Annual Report details how Women Human Rights Defenders (WHRDs) exposing gender-based violence (GBV) are systematically targeted with coordinated cyber-attacks, hacking, doxxing, non-consensual image sharing,

and highly sexualised digital smear campaigns. Beyond WHRDs, digital threats, surveillance risks, and access to protective resources vary significantly across marginalised groups: youth activists relying on open platforms face persistent real-time location tracking and online mobbing without legal defence; persons with disabilities (PWDs) face heightened exposure to social engineering because cybersecurity materials are rarely provided in accessible formats; minority clan organisations operate under severe financial constraints without secure hardware or encrypted channels; rural civil society organisations depending on basic, unencrypted mobile networks are exposed to interception; state and non-state actors face existential threats where compromised digital footprints lead to severe blackmail, displacement, or physical violence.

Because there is no functional, independent judiciary to enforce privacy laws or penalise state overreach, these campaigns go entirely unpunished, forcing many civic leaders into self-censorship to protect their personal and physical safety. Furthermore, the state's absolute failure to provide robust cyber-protection leaves critical civic organisations, international travel routes, and digital infrastructure completely exposed to hostile digital sabotage. This vulnerability was dramatically exposed by the massive, verified hack of the government's centralised visa portal. Following initial denials, Somali immigration officials finally admitted to a major electronic [visa system breach](#) after hackers penetrated the state-run travel portal. The breach exposed the sensitive personal data of at [least 35,000 travellers](#), international aid workers, and diplomats—including passport numbers, biometric records, dates of birth, and physical addresses—leaving them highly vulnerable to identity theft and state or extremist targeting. The UK government likewise updated its foreign travel advice via the [FCDO Foreign Travel Advice](#), warning that the e-visa breach remained ongoing and highly risky.

This major breach occurred alongside ongoing infrastructure attacks, such as a prolonged Distributed Denial of Service (DDoS) attack that crashed the [Somali Journalists Syndicate \(SJS\)](#) website by utilising over 20,000 compromised proxy IP addresses, an incident documented by independent digital forensics group [Qurium Media Foundation](#). These technical sabotage campaigns are often highly coordinated with physical state crackdowns; the digital attack on the syndicate's servers was intentionally timed with the arbitrary arrest and detention of its key human rights and advocacy officers. Operating under constant threat of both state-sponsored digital intrusion and extremist cyber-operations, Somali CSOs lack the financial resources, secure hardware, and technical capacity to build resilient digital shields. Ultimately, while formal institutional development is occurring through top-down legislation, practical digital security conditions and protective mechanisms for civil society actors are deteriorating overall, as emerging digital threats, spyware deployments, and surveillance capabilities advance far more rapidly than stagnant institutional protections and unenforceable legal safeguards.

6.3 | Digital Accessibility

Digital accessibility was rated as partially enabling for the 2025–2026 reporting period, unchanged from the score assigned in 2025. The environment therefore continues to be only partially enabling. While private-sector telecommunications infrastructure and mobile connectivity have continued to expand, structural barriers—including high relative costs, unreliable power, low digital literacy, cybersecurity risks, and sharp inequalities—persist and continue to limit meaningful digital participation for many citizens and civil society organisations.

According to the [DataReportal Digital 2026: Somalia report](#), there were 11.5 million active cellular mobile connections in the country in late 2025, equivalent to 58.1% of the total

population. Independent methodologies by [Kepios](#) estimate that actual internet penetration stood at 27.6% (about 5.47 million users). Official Federal Government of Somalia data reported via Hiiraan Online's coverage of the FGS [digital transformation strategy](#) put the figure at 10.7 million users (over 55% of the population). This growth is linked in part to the National Communications Authority granting an operational licence to Starlink in April 2025, as documented by [Space in Africa](#). The satellite service opened [nationwide coverage](#) later that year, offering a way around historic limitations of terrestrial and fibre networks.

Starlink represents one of the most significant developments of the reporting period. It expands options for remote and underserved areas and could strengthen civil society access where fibre and mobile networks remain weak. At the same time, its residential pricing—approximately [\\$70 per month plus around \\$390 for hardware](#)—places it beyond the reach of most households and smaller CSOs. Local mobile data plans are more affordable in absolute terms (for example, some [Hormuud bundles](#) offer several gigabytes for roughly \$6–7 per month), yet they remain expensive relative to low average incomes. High electricity costs, [among the highest in Africa](#) and often driven by diesel generators, further undermine last-mile reliability outside major urban centres such as Mogadishu, Garowe, and Hargeisa. The result is that connectivity gains do not automatically translate into equitable or sustained participation.

Mobile money remains the undisputed lifeline and backbone of the domestic economy. Traditional banking penetration sits at around [15%](#) because of limited physical branches and rigid documentation requirements. [Over 70–73%](#) of the population aged 16 and above actively uses mobile money services, according to World Bank reporting and related surveys. The ecosystem is dominated by three regional operators: Hormuud Telecom's EVC Plus in South-Central Somalia, Golis' Sahal in Puntland, and Telesom's Zaad in Somaliland. [Hormuud's partnerships](#) with Agro Bank and MyBank to enable transfers between mobile wallets and bank accounts mark a practical step toward greater interoperability. Beyond payments, mobile money has become a form of resilience for both citizens and CSOs. It supports remittances, daily transactions, humanitarian cash assistance, and organisational operations in an environment of weak formal infrastructure, reducing dependence on cash and physical bank branches. Concentration in a few platforms and limited advanced financial literacy, however, still constrain deeper use.

Despite private-sector progress, structural barriers severely limit meaningful and equitable digital accessibility. The [Internet Society's Pulse Internet Resilience Index](#) gives Somalia an overall score of 36–37 out of 100, driven down by an infrastructure readiness score of just 13%. Security barriers remain prominent: the country lacks robust DNS security validation and [scores poorly on the Global Cybersecurity Index](#) (around 37 in recent assessments). Civil society organisations operating online must navigate expensive data, power blackouts, incomplete regulatory safeguards, and elevated digital security risks. While the Data Protection Act exists, enforcement is weak and the Cybercrime Bill has moved slowly. Reports of surveillance and the use of mobile data in tracking journalists or activists underscore the volatile environment, as noted in [civil society baseline assessments](#). CSOs can disseminate information and coordinate to some extent, particularly in urban areas, yet consistent online engagement, advocacy, and secure communication remain difficult, especially for rural organisations and those serving displaced or minority communities. Some capacity-building efforts—[digital advocacy training](#) and targeted programmes for women and youth—have reached hundreds of participants, but scale remains limited relative to need.

Digital literacy constitutes a major constraint. Reliable national data on ICT skills are scarce. [Adult literacy is estimated around 54%](#), and roughly two-thirds of Somalis have no formal

education, limiting the ability to move beyond basic communication and social media, as noted in the [Somalia Digital Inclusion Policy](#). Available assessments indicate that most internet use stays at the level of contacting family and friends rather than accessing education, markets, public services, or civic tools. Public-sector digital skills show intermediate levels in some surveys, yet gaps persist and structured training is irregular. Targeted initiatives by [UNDP and partners](#), as well as programmes such as [Digital Shelter's Digital Skills for Girls](#), provide cybersecurity, data analysis, digital marketing, and online safety training for youth and women. These efforts are valuable but insufficient to close broader capacity gaps. As a result, both citizens and CSOs remain only partially equipped to adapt to evolving platforms and technologies.

Artificial intelligence and other emerging technologies are beginning to appear in policy discussions and pilots but have not yet reshaped broad participation. The Somalia AI Summit in 2026 and the Digital Agriculture Roadmap (2025–2028) highlight potential applications in farmer registries, weather information, livestock surveillance, and marketplaces. Civic-tech projects, including election-related initiatives, are emerging with support from regional funds. Youth training in related skills is expanding the talent pipeline. For most CSOs and citizens, however, these technologies remain distant because of low digital literacy, high costs, and limited infrastructure. Adaptation is concentrated among better-resourced urban actors.

Gender, age, disability, income, geography, and language continue to shape digital divides. Mobile phone ownership and mobile-money use show near parity between women and men ([around 81–85% in recent household data](#)). Internet use, however, remains lower among women. [Wealth and secondary education](#) dramatically increase women's odds of internet access; the poorest and least-educated women stay largely offline. Urban–rural differences are pronounced, with better coverage and reliability concentrated in major cities, as reflected in the [Somalia Digital Inclusion Policy](#). Policy documents recognise additional barriers for older adults, persons with disabilities, linguistic minorities, and low-income households, though systematic data remain limited. Without deliberate measures, connectivity gains risk reinforcing rather than reducing these inequalities.

Overall, the period shows gradual improvement in basic connectivity, with the arrival of Starlink as a potential equaliser for remote areas, continued strength of mobile money, and small-scale skills and civic-tech initiatives. At the same time, weak infrastructure resilience, high relative costs, low digital literacy, cybersecurity gaps, and persistent divides limit meaningful access. The central finding is one of gradual gains in connectivity combined with structural inequalities that continue to constrain effective digital participation for many citizens and civil society organisations.

C) Recommendations

Recommendations to the Government of Somalia

1. Legal and Regulatory Framework

- Federal Parliament should enact a unified federal NGO law that replaces fragmented registration regimes across Federal Member States and establishes a simple, notification-based registration system with clear timelines.
- Federal Parliament should eliminate duplicative registration requirements and prohibit the practice of requiring organisations to register separately at federal and state levels.
- Federal Parliament should establish independent administrative and judicial appeal mechanisms for organisations whose registration applications are denied, suspended, or revoked.
- Federal Parliament should amend or repeal restrictive provisions of the Public Order Law No. 21 of 1963 and equivalent regional laws that impose prior-authorisation requirements or facilitate disproportionate restrictions on peaceful assembly.
- Federal Parliament should enact a comprehensive Access to Information law aligned with international and African standards, including narrowly defined exemptions, public-interest override provisions, and independent oversight mechanisms.

2. Inclusion and Participation

- Federal Parliament should introduce legally binding enforcement mechanisms to operationalise the 30% parliamentary gender quota.
- Federal Parliament should establish formal measures to ensure the participation of minority clans, persons with disabilities, women, and youth in constitutional reform processes and national dialogue platforms.
- Federal Government institutions, including the National Consultative Council and constitutional reform bodies, should institutionalise meaningful representation of minority clans, persons with disabilities, women human rights defenders, and youth, moving beyond symbolic participation.

3. Registration and Operational Environment

- Ministry of Interior and Ministry of Planning, Investment and Economic Development should streamline CSO registration procedures and reduce administrative burdens on civil society organisations.
- Ministry of Interior and Ministry of Planning, Investment and Economic Development should reduce or waive registration fees for grassroots, women-led, youth-led, disability-rights, and minority-led organisations.

- Ministry of Interior and Ministry of Planning, Investment and Economic Development should establish accessible administrative and judicial recourse mechanisms for organisations affected by arbitrary registration, licensing, or operational decisions.
- Ministry of Interior and Ministry of Planning, Investment and Economic Development should end the selective use of registration, licensing, and financial regulations against advocacy, governance, human rights, and media organisations.

4. Digital Rights, Privacy and Security

- National Communications Authority (NCA) should introduce mandatory judicial oversight for content restrictions, network disruptions, and surveillance activities affecting civil society actors.
- NCA should publish regular information on government requests for user data, content restrictions, and internet disruptions.
- NCA should require telecommunications operators to publish periodic transparency reports detailing content-removal requests, user-data requests, and compliance with government directives.
- Data Protection Authority should fully operationalise Somalia's data-protection framework and strengthen enforcement mechanisms.
- Data Protection Authority should establish mandatory data-breach notification requirements, including timelines, reporting obligations, and remedies for affected individuals.
- Data Protection Authority should establish independent oversight mechanisms for surveillance activities conducted by security agencies, particularly the National Intelligence and Security Agency (NISA).

5. Accountability and Anti-Corruption

- Independent Anti-Corruption Commission (IACC) should be fully operationalised through transparent appointments, adequate resourcing, and guarantees of institutional independence.
- IACC should systematically investigate audit findings relating to public expenditure and donor-funded programmes and publish investigation outcomes.
- Office of the Auditor General (OAGS) should publish regular follow-up reports detailing actions taken to address audit findings and identified irregularities.
- OAGS should establish formal engagement mechanisms enabling civil society organisations to monitor implementation of audit recommendations.

Recommendations to Development Partners and Donor Agencies

1. Funding and Localisation

- Bilateral and multilateral donors should significantly increase direct funding to local Somali civil society organisations and reduce reliance on international intermediaries.
- Bilateral and multilateral donors should expand the availability of core, flexible, and multi-year institutional funding to strengthen the sustainability of local organisations.
- Bilateral and multilateral donors should establish dedicated funding windows for women-led, youth-led, disability-rights, minority-led, and other marginalised organisations.

2. Donor Compliance and Partnership Models

- United Nations agencies should increase the proportion of funding contracted directly to local civil society organisations.
- United Nations agencies should simplify due-diligence, compliance, and reporting requirements and ensure they are proportionate to grant size and organisational capacity.
- United Nations agencies should systematically cover overhead and core institutional costs as part of grant agreements.
- International NGOs should shift from subcontracting models toward genuine partnership approaches that share decision-making authority with Somali organisations.
- INGOs should co-design programmes, geographic priorities, and resource-allocation decisions with local partners.
- INGOs should transfer a fair share of overhead and institutional-support funding to local organisations to strengthen long-term organisational capacity.

3. Digital Protection and Security

- Digital-rights donors and protection-focused funders should increase investments in cybersecurity support for civil society organisations.
- Digital-rights donors and protection-focused funders should provide resources for secure digital infrastructure, encrypted communication tools, and digital-safety technologies tailored to the Somali context.
- Digital-rights donors and protection-focused funders should establish rapid-response and emergency-support mechanisms for women human rights defenders facing cyberattacks, surveillance, online harassment, and gender-based digital violence.
- Development partners should invest in digital literacy, digital security, and secure communications training for civil society organisations, particularly those operating in rural and high-risk environments.

Recommendations to Civil Society Organisations

1. Coalition Building and Civic Space Advocacy

- Somalia Non-State Actors Platform (SONSA), Somaliland Non-State Actors Forum (SONSAF), and other national CSO networks should build stronger and more coordinated coalitions to advocate for NGO law reform, registration reform, and protection of civic freedoms.
- National civil society platforms and networks should coordinate systematic monitoring and documentation of restrictions on freedom of association, assembly, and expression.
- National civil society networks should adopt institutional inclusion targets to increase representation of women, youth, persons with disabilities, minority clans, and other marginalised groups in leadership and decision-making structures.

2. Media Freedom and Journalist Protection

- Media organisations and media associations should strengthen the documentation of attacks against journalists and media workers.
- Media associations should pursue strategic advocacy and legal action to challenge impunity for violations against journalists.

- Media associations should establish organisational digital-security standards, secure communications protocols, and rapid-response protection mechanisms for journalists at risk.

3. Women's Rights and Inclusive Participation

- Women's rights organisations and Women Human Rights Defender (WHRD) networks should monitor and publicly report on implementation of the 30% parliamentary gender quota and related inclusion commitments.
- Women's rights organisations and WHRD networks should strengthen collective protection systems against online harassment, smear campaigns, cyberattacks, and physical threats.
- Women's rights organisations and WHRD networks should develop shared security protocols and mutual support mechanisms to improve resilience and protection.

4. Human Rights Monitoring and Digital Rights Advocacy

- Human rights organisations and defender coalitions should monitor implementation of digital-rights safeguards, data-protection measures, and surveillance oversight mechanisms.
- Human rights organisations and defender coalitions should systematically document violations affecting minority-clan organisations, disability-rights groups, youth organisations, and IDP-led organisations.
- Human rights organisations and defender coalitions should ensure that the experiences of marginalised groups inform broader advocacy on civic space and governance.

5. Organisational Resilience and Civic Education

- All civil society organisations should adopt formal cybersecurity policies, encrypted communications systems, secure cloud-storage solutions, and routine digital-safety training for staff and volunteers.
- All civil society organisations should develop incident-response protocols to address cyberattacks, surveillance, and digital-security threats.
- Civil society organisations, community networks, and civic educators should expand grassroots civic education initiatives to strengthen informed citizen participation.
- Civil society organisations and media actors should use responsible digital storytelling and public-awareness campaigns to counter extremist narratives, challenge misinformation, and strengthen public confidence in civil society as an independent actor promoting community development, peacebuilding, accountability, and democratic governance.

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 panel for this report was convened in July 2026.** 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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