

# State Involvement in NGO Representative Bodies: A Comparative Analysis

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# Table of Contents

<b>Introduction</b>	<b>2</b>
<b>Comparative Analysis</b>	<b>4</b>
A. Establishment	4
B. Governance and Leadership	7
C. Funding	10
D. Role in Oversight	13
E. Role in Policymaking	16
F. Role in Promoting NGO Self-regulation	19
G. Relationship with Independent Networks	21
H. Considerations Under International Law	24
I. Summary of Lessons Learned	25
<b>Recommendations</b>	<b>28</b>
Donors	28
National Governments	29
Civil Society	30
<b>Appendices</b>	<b>32</b>
Appendix A: Methodology	33
Appendix B: Features of State Involved NGO Representative Bodies	35
Appendix C: Summary of NGO Representative Bodies Covered in this Report	39

# Introduction

NGO representative bodies can play an important role in convening organizations and advancing the collective interests of civil society. At the same time, governments sometimes play a direct or indirect role in shaping how these bodies function. This involvement may take several forms, including establishing umbrella organizations by statute, requiring NGO membership as part of registration systems, providing financial support, influencing leadership and internal governance, or delegating oversight and policy consultation roles to representative bodies.

This report examines how different forms of state involvement influence the role and functioning of select NGO representative bodies in practice. In particular, it analyzes how state involvement influences coordination, representation, and oversight within civil society and how independent NGOs and networks interact with representative bodies that maintain close institutional ties with government. It draws on country-level research conducted in Tanzania, Ethiopia, Sierra Leone, Malawi, Kazakhstan, Uzbekistan, Nepal, and Botswana, relying primarily on qualitative analysis, including desk research and consultations with civil society actors, representative bodies, and government stakeholders. Further detail on the research methodology is provided in Appendix A.

Comparative analysis of seven key features of state involvement suggests that NGO representative bodies fall along a spectrum. At one end, there are bodies created or institutionalized through statute and integrated into national regulatory frameworks, such as in **Tanzania and Ethiopia**. A second model involves coordination bodies that originated as voluntary civil society initiatives but later acquired formal roles within state oversight or governance systems, as illustrated by **Sierra Leone and Malawi**. The third model involves representative bodies that operate as state-supported or state-aligned coordination platforms without a clear statutory mandate, as in **Kazakhstan and Uzbekistan**. Finally, some representative bodies operate as independent membership-based federations established voluntarily by civil

## Spectrum of NGO representative bodies covered in this report

1

### Tanzania and Ethiopia

Bodies created or institutionalized through statute and integrated into national regulatory frameworks.

2

### Sierra Leone and Malawi

Coordination bodies that originated as voluntary civil society initiatives but later acquired formal roles within state oversight or governance systems.

3

### Kazakhstan and Uzbekistan

Representative bodies that operate as state-supported or state-aligned coordination platforms without a clear statutory mandate.

4

### Nepal and Botswana

Independent membership-based federations established voluntarily by civil society organizations without formal statutory mandates.

society organizations without formal statutory mandates, as in **Nepal** and **Botswana**. A chart summarizing the features of NGO representative bodies appears in Appendix B. Brief profiles of the representative bodies studied appear in Appendix C.

Across these models, several patterns recur:

- Statutory authority strongly shapes the independence, legitimacy, and long-term role of NGO representative bodies.
- Indirect state influence can affect the governance of representative bodies and encourage risk-averse leadership.
- How a representative body is funded can influence its priorities, sector trust, and competition with member NGOs, while limited resources can constrain its effectiveness.
- Embedding representative bodies in registration, compliance, or monitoring systems can blur the distinction between representation and regulation.
- State-defined policymaking channels can concentrate representation and limit bottom-up civil society input.
- Legally mandated self-regulation can function as an extension of state oversight rather than a voluntary sector initiative.
- Recognizing a single umbrella body as the primary interlocutor can limit participation by independent networks and smaller NGOs.

The report presents strategic recommendations aimed at strengthening civil society's independence and voice while identifying potential actions for key stakeholders to address state involvement in NGO representative bodies:

- For **donors**, the recommendations highlight the importance of supporting diverse civil society networks rather than relying on a single umbrella body, expanding funding pathways for NGOs, and encouraging transparency in how representative bodies are governed and funded.
- For **national governments**, the report emphasizes enabling multiple forms of civil society representation, avoiding the delegation of exclusive representational authority to a single umbrella body, ensuring open consultation processes, and supporting voluntary self-regulation developed by the NGO sector.
- For **civil society**, the recommendations stress the importance of strengthening transparency and participation within representative bodies, advocating for voluntary membership consistent with freedom of association, and building strong horizontal networks and coalitions that complement formal umbrella organizations.

# Comparative Analysis

State involvement in NGO representative bodies varies significantly depending on the country context and key attributes of the bodies themselves, affecting civil society independence, voice, and representation in different ways. This part compares and analyzes seven key features of state involvement in NGO representative bodies covered in our research. These features are: (A) Establishment; (B) Governance and leadership; (C) Funding; (D) Role in oversight; (E) Role in policymaking; (F) Role in promoting NGO self-regulation; and (G) Relationship with independent networks.

## A. Establishment

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Whether through state action or a voluntary initiative, how an NGO representative body is established plays an important role in its independence, legitimacy, and ability to serve the interests of the NGO sector. Across the countries reviewed, two broad patterns emerge: representative bodies created or formalized through statute or policy, and those established voluntarily by NGOs and independent actors. Both models may use similar language about “coordination” or “representation,” but their origins often determine how they operate in practice and how NGOs perceive their legitimacy.

In **Tanzania**, the National Council of NGOs (NaCoNGO) was established directly under Section 25 of the NGO Act as the NGO sector’s formal coordinating body. Section 25(4) further provides that no person or organization may perform functions that the Council is empowered to carry out under the Act, granting it statutory exclusivity over national coordination functions. Membership is automatic for all NGOs. This legal foundation positions NaCoNGO as an integral component of the state-defined NGO governance architecture.

**Ethiopia** applies a similar statutory model. Proclamation No. 1113/2019 establishes the Ethiopian Civil Society Organizations Council (ECSOC) as a formal coordination body and mandates membership for all registered NGOs. Further, the law granted the state regulator, the Federal Authority for Civil Society Organizations (ACSO), authority to convene ECSOC’s founding meeting, while ECSOC can appoint three of its representatives to ACSO’s board. Other laws and policies provide ECSOC with coordination and sectoral representation roles on disaster risk management, societal dialogue, and collaboration with the government. In addition, research respondents shared concerns regarding duplication of leadership roles across network NGOs, ECSOC, and ACSO. Several individuals hold multiple positions simultaneously within these various supervisory boards, raising questions about conflicts of interest and perceptions that decision-making is concentrated among a small group of actors.

In **Sierra Leone**, the Sierra Leone Association of Non-Governmental Organisations (SLANGO) evolved in a different manner. It was originally registered in 1994 as a voluntary coalition of local and international NGOs to coordinate the civil society sector and its engagement with the government and donors. However, SLANGO has increasingly assumed a role in NGO registration and compliance. Under the Ministry of Planning and Economic Development’s 2023–2028 National NGO Policy Framework (NGO Policy), SLANGO is responsible for a number of coordination and oversight functions. While NGO membership was formerly optional, the NGO Policy requires SLANGO membership to register with the Ministry of Planning and Economic Development, and failure to comply can affect government decisions on annual NGO re-registration. As a result, some NGOs interact with SLANGO to meet administrative requirements rather than for advocacy or collective representation, with one noting, “the only time we interact with SLANGO is for registration and renewal.” At the same time, the NGO Policy designates SLANGO to “represent the NGO community in collective advocacy, strategy, planning and policy matters,” creating a formal mandate for sector-wide representation that some research respondents perceive as unfulfilled in practice.

In **Malawi**, the Council for NGOs in Malawi (CONGOMA) was established by NGOs as a trust in 1987 to serve as a coordinating body for NGOs. The NGO Act later institutionalized CONGOMA as the “designated NGO coordinating body” and established its statutory functions, including representing and promoting the collective interests of NGOs. Until a 2022 amendment to the NGO Act, NGOs in Malawi were required to register with both the state regulatory body, NGO Regulation Authority (NGORA), and with CONGOMA. Although membership with CONGOMA is no longer mandatory, some research respondents still treat it as a de facto requirement, sometimes in order to obtain a “stamp of approval” from donors or in connection with the tax system. As one respondent noted, “To operate nationally and engage in policy work, being part of [CONGOMA] is essential. It is a strategic necessity.”

## Summary: Establishment

1

**Tanzania:** Established by NGO Act as sector's formal coordinating body.

**Ethiopia:** Established by the Organizations of Civil Societies Proclamation No. 1113/2019.

2

**Sierra Leone:** Registered as independent coalition; oversight role later authorized by NGO Policy.

**Malawi:** Registered as independent trust and role later recognized by NGO Act.

3

**Kazakhstan:** Registered as association of legal entities; state-aligned without formal statutory mandate.

**Uzbekistan:** Registered as legal entity; government decrees approve staffing, salaries, resources, and structure.

4

**Nepal:** Registered under National Directorate Act; independent membership-based association.

**Botswana:** Registered as a society; independent.

In contrast to these models, **Civil Alliance of Kazakhstan** (CAK) reflects more of a state-influenced formation. The origins of the CAK date back to the early 2000s, when high-level dialogue with the government generated the idea of a single national NGO umbrella, and several research respondents described the initiative as coming “from above.” CAK was established as an association of legal entities. Its structure includes regional civil alliances based in all 17 regions of Kazakhstan, with each branch registered as an independent legal entity rather than a subdivision of the CAK. According to its website, the CAK claims to represent over 8,000 NGOs in Kazakhstan, but research was unable to verify the accuracy of this figure or how it was determined. Moreover, research was unable to identify a formal structure for how CAK recruits or engages with its members, or their role in its internal governance, with some respondents speculating that there are no formal procedures. As a result, the CAK appears to function primarily as a national coordination platform for civil society and state interaction rather than a member service organization.

In **Uzbekistan**, the National Association of Non-Governmental Non-Commercial Organizations of Uzbekistan (NANNOUz) was established in 2005 “at the initiative of 150 NGOs.” Information on its founders, bylaws, and other documents related to its registration is not publicly available. However, its role as an apex state-backed umbrella organization is institutionalized by government decrees that approve its staffing, resources, and organizational structure. Membership is not obligatory, but some NGOs reported pressure to join as a condition to access training, international events, and potential funding sources.

By contrast, some NGO representative bodies were created directly by NGOs, with no statutory designation, mandatory membership, or state involvement. For example, the NGO Federation of **Nepal** (NFN) was established in the early 1990s by NGOs during the country’s democratic transition as a membership-based federation and registered as an independent association under the Association Registration Act. It was not created or designated by legislation as an official umbrella, and the state has no formal role in appointing its leadership or defining its mandate. NFN was later re-registered under the National Directorate Act, which, according to research, offers a higher level of legal status and protection and may reduce operational vulnerability to external pressure. At the same time, NFN’s more formal and somewhat exclusive status places it in a different regulatory regime from more common NGO forms and is viewed by some research respondents as subjecting it to “increased expectations” from the government. Despite these dynamics, NFN’s bottom-up legal formation supports civil society perceptions of NFN as a representative body that works with government while remaining institutionally independent.

In **Botswana**, the Botswana Council of NGOs (BOCONGO) was established by NGOs in 1995 as a registered society to serve as a coordinating body for the sector. It was not

created or designated by legislation as an official umbrella. However, in 2001, the Ministry of Labour and Home Affairs adopted the National Policy for Non-Governmental Organizations, which states that BOCONGO's mandate "is to co-ordinate the NGO movement in Botswana and to facilitate the establishment of an enabling environment for NGO work." At the same time, the state has no formal role in appointing its leadership and membership is not obligatory. One research respondent stated that consultations with NGOs during its establishment were limited, which they felt narrowed BOCONGO's perceived sector-wide mandate. NGOs reported joining BOCONGO to access training, networking, and opportunities to participate in public policy processes.

These differences in how NGO representative bodies are established affect their mandates in practice and often influence their internal governance and leadership structures, impacting decision-making processes and accountability to members.

## B. Governance and Leadership

Governance and leadership arrangements determine who participates in decision-making in NGO representative bodies, how they are held accountable to their members, and the level of direct and indirect state involvement in their operations.

In **Tanzania**, NaCoNGO maintains an elected leadership structure, but it operates within a statutory oversight framework in which the NGO Coordination Board, chaired by a presidential appointee, retains supervisory authority over the NGO sector. Stakeholder accounts describe perceptions of government involvement in leadership elections, and concerns over informal political alignment within NaCoNGO's leadership.

Similarly, in **Ethiopia**, ECSOC's leadership is formally elected by member organizations, and there is no official government role in selecting leaders. Although the state does not

## Summary: Governance and Leadership

1

**Tanzania:** Governed by a National Council elected by members and an Executive Committee and managed by a Secretariat.

**Ethiopia:** Governed by General Assembly of 300 founding members and an Executive Committee that is accountable to the General Assembly; managed by a Secretariat.

2

**Sierra Leone:** Governed by a Board elected by members' General Assembly; managed by Secretariat.

**Malawi:** Governed by a Board of Trustees elected by members' General Assembly; managed by a Secretariat.

3

**Kazakhstan:** Internal governance documents not available; operates at the national, regional, and NGO levels.

**Uzbekistan:** Leadership reportedly appointed or approved by government.

4

**Nepal:** Executive Committee elected by representative National Convention; managed by a Secretariat.

**Botswana:** Governed by a Board elected by members' General Assembly; managed by a Secretariat.

formally participate in ECSOC's internal governance, some research respondents reported there may be informal pressure on the EXCOM, potentially affecting neutrality of some of the EXCOM members who have government affiliations.

In **Sierra Leone**, governance is formally member-based but influenced by the organization's role in statutory oversight. SLANGO implements a Strategic Plan that defines its governance structure, with elected leadership. The association is governed by a ten-member board representing both national and international NGOs, elected for two-year terms and limited to a single re-election, and responsible for supervising the secretariat (led by the executive director and staff who manage SLANGO's daily operations), among other functions. Despite these formal structures, members reported limited participation in internal governance, with one remarking, "Everything happens in Freetown... we only hear about decisions afterwards," and other stakeholders noting minimal report back and disclosure on decision-making processes. As one research respondent shared, "They ask us to be accountable, but we don't see accountability from them." Others expressed concern that leadership is politically constrained in engagements with the government, with one research respondent noting, "SLANGO cannot openly oppose government policies because leadership is politically influenced. NGOs' priorities are secondary." Since SLANGO also supports NGO oversight and regulatory compliance, these accounts suggest that the organization struggles to maintain legitimacy before members.

**Malawi** presents a more member-driven governance model, although, due to its role as the national coordinating body, one in which the state still has influence. CONGOMA's governance structures are formally led by members and autonomous, with leadership elected by a General Assembly and no statutory role for government ministries or regulators. Its institutional framework includes a General Assembly, Board of Trustees, and Secretariat, while it conducts leadership selection and executive recruitment through internal, constitutionally defined procedures. However, research suggests that leadership is often drawn from larger NGOs that work closely with state institutions, and CONGOMA's statutory recognition as the national coordinating body encourages leadership to prioritize cooperation with government institutions to preserve access and influence. While this can enhance its convening authority, it also situates CONGOMA in a policy environment that rewards cooperation with regulators and may discourage more assertive sector advocacy.

Governance transparency is a key concern in **Kazakhstan**, where the CAK lacks publicly accessible bylaws or clearly documented membership criteria. The CAK's multi-tiered structure, under which regional civil alliances serve as formal members while individual NGOs participate only indirectly, further obscures the definition of its membership base and how it incorporates member interests into national-level representation. In addition, its current and prior leadership previously served in senior government roles.

Some research respondents see government influence in leadership selection, noting a lack of competition and alternative candidates. While some research respondents interpret this as evidence of external influence, others describe it as a pragmatic strategy to maintain stability and preserve access to state dialogue in a constrained political environment.

NGO respondents reported similar transparency concerns in **Uzbekistan**, remarking they are not invited to NANNOUz general assemblies or decision-making meetings, while also describing a general lack of transparency around how leadership decisions are made. Several respondents indicated that members have no visibility into or influence over the organization's governance.

On the other hand, **Nepal** reflects a strongly institutionalized member-driven governance framework. NFN's governance operates under its own constitution, with "leadership elected through internal democratic processes" and "no direct institutional involvement of the state in its governance or operational structures." The federation maintains a central committee and executive management committee, and selects its leadership through internal elections, fixed leadership terms, and rotation rules. NFN also holds annual assemblies across provinces and districts, allowing member NGOs to review and reflect on issues and challenges. Membership is voluntary and generally restricted to NGOs with a development focus. Research respondents highlighted that membership enhances credibility, access to information, and capacity-building support, particularly for smaller organizations. As a safeguard against indirect state involvement, leaders cannot hold political party membership and lose their positions if they accept state employment or political appointments. Although these safeguards are widely understood and accepted, several NGOs noted that in a highly politicized civic environment, informal affiliations and perceived proximity to political actors can still affect trust in NFN's governance, even in the absence of direct interference. Beyond these internal perception challenges, NFN's engagement with the state places its independent governance structures under additional pressure, as it seeks to retain access as a national coordination platform while maintaining legitimacy as an advocate for NGOs facing civic space restrictions.

In **Botswana**, BOCONGO's board is formally elected by member organizations at its Annual General Meeting, and there is no official government role in selecting the board or BOCONGO's Executive Director and staff. Although the state does not formally participate in BOCONGO's governance, some respondents suggested that informal relationships between civil society and government can create perceptions of political influence.

Beyond formal governance arrangements, funding sources further influence how leadership operates in practice, affecting priorities, accountability, and the degree of independence from the state.

## C. Funding

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Sources of funding, particularly from governments, can shape how NGO representative bodies interact with their members and overall perceptions of accountability. Across the countries reviewed, funding arrangements range from direct state financing to donor- and membership-fee models.

Despite its statutory mandate and role in supporting oversight over the NGO sector, NaCoNGO in **Tanzania** receives no direct government budget support and relies primarily on donor funding to sustain its activities. NaCoNGO previously collected membership fees but discontinued this practice following member complaints over the lack of accountability and transparency on how the funds were utilized. As a result, NaCoNGO submits project proposals to the same local and international donors from whom its members seek funding. Research indicated that this competition could undermine NaCoNGO's role as a neutral sector-wide coordinator.

Other representative bodies face greater dependence on external funding and challenges with financial viability. In **Ethiopia**, although the statute establishing ECSOC identifies “member contributions and other legal means” as its primary income sources, it receives no financial support from the government, and membership fees are insufficient to cover basic operating costs. Although ECSOC previously relied on foreign donors for operational support, research indicated that it does not currently have active donor-funded projects. Research respondents also expressed differing opinions on whether ECSOC should help members access funding, with some viewing ECSOC as a competitor within a constrained funding environment. Further, proposed amendments to the CSO Proclamation would require all members of ECSOC to pay membership fees. ECSOC's president supports this provision and indicated the fee obligation may be linked to NGOs' annual reporting to ACSO. While the nature of this connection is unclear, it could potentially generate the perception that ECSOC membership is primarily a vehicle for state oversight and control rather than collective representation.

### Summary: Funding

1

**Tanzania:** Donor funding. Receives no direct government budget support.

**Ethiopia:** Membership fees; donor funding. Receives no government financial support.

2

**Sierra Leone:** Membership fees; limit donor and project-linked state funding.

**Malawi:** Donor funding; membership fees; project-linked state funding.

3

**Kazakhstan:** State funding; membership fees.

**Uzbekistan:** Primarily state funding; donor funding.

4

**Nepal:** Membership fees; donor funding; project-linked state funding.

**Botswana:** Donor funding; state funding; membership fees.

SLANGO in **Sierra Leone** relies primarily on membership fees and limited donor and project-specific state funding. Research did not identify how much each funding source contributes to total income, but SLANGO appears to rely heavily on member fees, which reportedly are used to support its role under the NGO Policy as a compliance intermediary between NGOs and the government. Some research respondents reported limited transparency regarding how member fees are used. SLANGO also reportedly receives some donor funding, but research did not identify specific projects supported by this funding or whether SLANGO competes with other NGOs or independent networks for the same resources.

In **Malawi**, CONGOMA's funding structure similarly combines membership fees, donor-supported projects, and occasional project-linked state funding. Research indicates that membership fees provide core support but remain insufficient to sustain full coordination and advocacy functions. CONGOMA relies heavily on donor-funded projects and capacity-building initiatives, which leadership described as "project-based support for sector strengthening, not unrestricted institutional funding." While leadership also reported that the organization does not receive routine government budget support, research respondents cited instances of funding through the state regulator NGORA's NGO Fund. Some expressed concern that even minimal state funding may affect perceptions of advocacy independence. Because donor funding is largely project-based and competitively awarded, CONGOMA effectively applies within the same funding pools as its members, positioning it as both sector coordinator and resource competitor. In addition, research respondents noted that CONGOMA issues reference and endorsement letters for funding and partnership processes, which donors often treat as signals of organizational credibility. As one NGO remarked, "When we started, donors asked if we were CONGOMA members. It was a stamp of approval. The main benefit is the certificate of membership, which we attach to proposals." Although administrative in nature, this role positions CONGOMA as a key intermediary, creating a dual dynamic where it both competes for and influences access to funding.

In **Kazakhstan**, in contrast, the research indicates that the CAK relies heavily on state funding mechanisms rather than member contributions or donor funding. State social contracting, grants administered through the Center for the Support of Civic Initiatives, and participation in a multi-year "strategic partnership" with the Ministry of Culture and Information represent major funding sources, with approximate annual funding volume likely exceeding 100 million Kazakhstani tenge (approximately 150,000 GBP). The research further indicates that the CAK has received funding not only through competitive procedures but also through single-source bids for specific activities commissioned by state authorities. Notably, the legal requirements for "strategic partnership" include criteria that some research respondents view as tailored to the CAK's organizational structure, such as maintaining formal members in more than half of the regions in Kazakhstan, thereby reinforcing perceptions that it is a pre-

ferred state partner. Limited publicly available information on competitions and funding decisions under the strategic partnership mechanism further reduces transparency around these arrangements. Research respondents also report that although the CAK formally envisions the collection of membership dues, it generally does not collect them in practice, furthering the CAK's reliance on external and primarily state funding for its activities. Respondents further noted that CAK does not provide direct financial support to its members or redistribute resources internally. In a competitive state funding environment, this reinforces perceptions of CAK as a funding competitor rather than a support structure for the sector.

**Uzbekistan's** NANNOUz represents an even stronger concentration of state-linked financial influence. It functions not only as a direct beneficiary of state support but also as an intermediary for NGOs within public funding channels. Research respondents reported that access to certain parliamentary and public subsidies requires a recommendation or coordination with NANNOUz, with one noting that their organization "cannot receive funds without such recommendation." At the same time, several respondents described internal grant allocations as non-transparent, stating that they "do not know who received these grants" and that funding decisions are not publicly disclosed. Others indicated that NANNOUz prioritizes its own fundraising activities and does not systematically redistribute resources to member NGOs, reinforcing perceptions that it functions primarily as a gatekeeper for state funding to NGOs.

The NFN in **Nepal** relies primarily on membership contributions and donor-funded projects. According to NGOs interviewed, NFN's minimal state funding, primarily for one-time projects, has not negatively affected its representative role. However, some members noted that reliance on donor-funded projects can still shape priorities. For example, research respondents indicated that NFN's direct engagement with donors has sometimes weakened its voice on issues such as competition between INGOs and local NGOs for earmarked grants, the local registration of international organizations to access funding streams intended for nation-



NFN's minimal state funding, primarily for one-time projects, has not negatively affected its representative role. However, some members noted that reliance on donor-funded projects can still shape priorities.

al actors, and donors' increasing tendency to award large grants to private companies rather than partnering with NGOs. These concerns suggest that even in the absence of strong state influence on NFN, external funding dynamics can affect perceptions of advocacy independence. At the same time, some research respondents cautioned that increased reliance on government funding could alter NFN's positioning if linked to expectations that it cooperates with the state on sensitive issues. Recognizing the tensions between sustainability and autonomy, as well as more intense competition between NGOs, and even with the NFN, over reduced foreign funding, the NFN has been active in sectoral efforts to develop social enterprise and corporate social responsibility as alternative domestic resource mobilization approaches.

In **Botswana**, BOCONGO's funding structure combines donor funding, state support, and member fees. Research indicates that donor funding provides the bulk of support and is project-based. Some research respondents stated that BOCONGO has played a positive role in addressing sustainability issues by facilitating funding from donors, providing letters of support, and convening trainings on alternative funding models for NGOs. At the same time, several respondents suggested that while BOCONGO is positioned as a coordinating body within the sector, it has occasionally taken on project implementation and competed with its members for the same funding pools, a challenge that has become more acute in today's constrained funding environment. This was characterized as a drawback by one respondent, who noted that the benefits of membership in BOCONGO could potentially be "undermined" by this competitive dynamic.

Funding can also be closely linked to the oversight roles performed by NGO representative bodies, particularly when it intersects with compliance and regulatory functions.

## D. Role in Oversight

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Across the countries examined, NGO representative bodies range from being directly embedded in oversight systems to playing advisory or no formal regulatory roles.

In **Tanzania**, NaCoNGO is integrated into the NGO oversight framework. NGOs are required by law to submit annual reports not only to the Registrar and National NGO Coordination Board but also to NaCoNGO. It is also responsible for implementing a statutory sector Code of Conduct, which NGOs are required to comply with. Violations can, in theory, result in administrative penalties or jail time. Research indicates that these penalties are generally not enforced in practice, but NaCoNGO has issued warnings and other "undisclosed" administrative measures for violations.

Likewise, under the National NGO Policy Framework in **Sierra Leone**, SLANGO supports the government with compliance and oversight, including roles in NGO registration, annual renewal processes, and confirmation of legal status to donors. In the latter

case, SLANGO acts primarily as a gatekeeper, providing confirmations while rarely helping NGOs meet donor criteria or strengthen their fundraising capacity. Notably, it also engages in monitoring, document verification, and compliance reporting to the government, at times contributing to enforcement by issuing warnings and facilitating NGO deregistration processes. The threat of sanctions reportedly creates an atmosphere of caution and self-censorship, with one NGO noting that “[one] misstep and closure threats follow, even when you operate legally.” SLANGO’s close association with compliance and enforcement appears to affect its perceived legitimacy as a sector representative, as some NGOs interact with SLANGO primarily because they are obligated to do so rather than to seek its support.

Other models confer oversight authority solely to government agencies. ECSOC in **Ethiopia** does not register, monitor, or sanction NGOs, although it is empowered by statute to advise the state regulator, ACSO, on administrative and registration issues. Research did not identify evidence that ECSOC systematically performs this role. However, when several NGOs were suspended in 2022 during the Tigray war, ECSOC publicly expressed concern and, according to one affected organization, provided “genuine representation.” While some respondents later criticized ECSOC for not taking a more confrontational stance, ACSO acknowledged that “the Council has made greater contribution on the removal of the suspension of the four CSOs.” At the same time, some NGOs view ECSOC as taking a passive approach in other areas. For example, the CSO Proclamation grants ECSOC authority to nominate three members to the ACSO Board, which, along with other seats designated for NGOs, gives the sector a majority on the Board. While this structure formally includes NGO representation within the regulatory body, research respondents noted that the Board has not functioned for the past two years, and ECSOC has not publicly challenged its inactivity. These cases illustrate how ECSOC functions as an intermediary in some regulatory disputes despite lacking formal oversight authority, while facing questions about how assertively it carries out its representational mandate.

## Summary: Role in Oversight

1

**Tanzania:** Monitors member reporting and compliance.

**Ethiopia:** Empowered to advise state regulator; state-sector intermediary; nominates regulator Board members.

2

**Sierra Leone:** Manages the registration and annual renewal of member NGOs, oversees compliance with documentation requirements, and other regulatory obligations.

**Malawi:** Advises NGOs on statutory obligations; supports member compliance; conducts internal reviews and organizational assessments.

3

**Kazakhstan:** No formal oversight role.

4

**Nepal:** No formal oversight role.

**Botswana:** No formal oversight role; supports coordination, training, sector participation.

In **Malawi**, NGOs are required to register with the state regulator NGORA. Prior to amendments to the NGO Act in 2022, NGOs were also required to register with CONGOMA. This earlier registration structure placed the representative body directly within the compliance process and linked membership to maintaining legal standing in the sector. Although the dual registration requirement was removed, CONGOMA continues to occupy a statutory coordination role within Malawi’s NGO governance framework, which includes implementation of a sectoral Code of Conduct and other compliance functions aimed at promoting standard setting in the sector. While lacking a formal role in state oversight, a NGORA representative noted that CONGOMA helps “sensitize the NGO sector so that they know the requirements.”

In **Kazakhstan**, the CAK does not play a direct role in regulatory oversight. However, the research notes that CAK has supported sector-wide regulatory initiatives such as the mandatory NGO database and burdensome foreign funding reporting obligations, which some research respondents viewed as contrary to sectoral interests and as contributing to increased state oversight of the sector.

In **Botswana**, BOCONGO does not play a role in regulatory oversight of the sector, instead focusing on coordination, training, and promoting participation. NGO oversight is primarily conducted by the Registrar of Societies and the Companies and Intellectual Property Authority, as NGOs can register as either societies or companies under Botswanan law. In some cases, research indicates that BOCONGO has helped the sector respond to oversight challenges, including calling for the Registrar of Societies to extend the registration period for societies due to difficulties with its online registration portal in 2025.

In **Nepal**, state regulators exercise centralized oversight over the NGO sector. NFN is excluded from registration and monitoring processes. Regulators have argued that this separation preserves accountability and avoids conflicts of interest. However, several research respondents argued that NFN should play a more substantive role in oversight, both by shaping regulatory frameworks and participating in their implementation. NGOs further noted that state requirements for affiliation, periodic renewal, project approval, and mandatory evaluation create significant administrative pressure. Although these mechanisms are framed as safeguards for transparency, many NGOs perceive them as instruments of control. In this context, NFN’s exclusion from formal oversight is seen by some members as weakening civil society’s capacity to safeguard civic space and limiting the practical effectiveness of sector representation.

The role of NGO representative bodies in oversight often extends into policymaking, shaping how civil society engages with the government.

## E. Role in Policymaking

In several countries, NGO representative bodies have a formal role in policy dialogue, which affects the structure and quality of government engagement with civil society. In some contexts, they have also played roles in NGO legal reform processes, while in others, their engagement has been limited to state-led platforms with limited evidence of independent agenda-setting.

In **Tanzania**, NaCoNGO contributes to policymaking through frameworks largely tied to state management of the sector. Its representation on the National NGO Coordination Board, including monitoring NGO annual reports, leads to regular dialogue with regulators on implementation and policy issues. However, it appears to primarily focus on compliance rather than advancing sectoral policy priorities. In public forums, NaCoNGO has raised administrative challenges affecting NGOs, such as delays in project permits, tax-exemption procedures, and other challenges. It also participated in a recent NGO initiative to recommend revisions to NaCoNGO's governing regulations aiming to enhance its role in sector self-regulation. At the same time, research did not identify evidence that NaCoNGO plays an active, representative role in promoting legal reforms benefiting the sector. Research respondents highlighted the 2024 Annual NGOs Forum, where NaCoNGO reportedly encouraged NGOs to participate in upcoming local government and general elections, despite ongoing national debate over whether the elections should be held. Several NGOs interpreted this as introducing political messaging into what was expected to be a neutral sector platform, contributing to perceptions that NaCoNGO functions more as a conduit for state priorities than as an independent representative body.

Similarly, in **Sierra Leone**, the National NGO Policy Framework recognizes SLANGO as a coordinating body, but many respondents view it primarily as a compliance intermediary. When opportunities for policy engagement are available, respondents describe them as structured within state-led fora and centralized in the capital, limiting access for regional

### Summary: Role in Policymaking

1

**Tanzania:** Serves as an intermediary in policymaking.

**Ethiopia:** Serves as state designated policy intermediary.

2

**Sierra Leone:** Recognized as a coordinating body in the National NGO Policy Framework. Facilitates dialogue between the NGO sector and government through centralized, government-led platforms.

**Malawi:** Represents NGOs in policymaking through coordinated sector consultations. Facilitates member participation in legal and national policymaking.

3

**Kazakhstan:** Serves as state recognized policy intermediary; organizes civic forums; speaks for sector in government-decision making.

4

**Nepal:** Conducts member-focused advocacy; provincial and district assemblies; coalition-building; and provides policy input.

**Botswana:** Conducts member consultations; policy advocacy; nominates members to technical working groups.

networks. Respondents also find SLANGO’s advocacy efforts to be limited and often aligned with state priorities. For example, during policy discussions on registration fee adjustments, some NGOs expected SLANGO to advocate for tiered or reduced fees, but instead, SLANGO reportedly justified the changes, reflecting a view among research respondents that SLANGO is more of a “messenger” for government compliance directives than an independent policy advocate. Several NGOs also cited instances where SLANGO did not intervene in response to burdensome operational requirements imposed by the government, including physical office, staffing, and compliance certification conditions that disproportionately affect smaller or provincial organizations. In these cases, NGOs reported that SLANGO did not challenge these thresholds, reinforcing perceptions that it focuses more on facilitating compliance with government policy rather than defending civic space.

Although it maintains a variety of formal cooperation agreements with government institutions, research also indicates that ECSOC in **Ethiopia** has, in certain instances, advocated for sector interests in policymaking processes. During debates over proposed amendments to the CSO Proclamation, research respondents reported that the ECSOC successfully mobilized the CSO community, coordinated expert input, and engaged directly with the government, contributing to the removal or revision of several restrictive provisions. Although some restrictive provisions remain, this episode illustrates ECSOC’s capacity to mobilize members, influence legal reforms, and serve as a sectoral representative while carrying out a statutory role.

CONGOMA in **Malawi** represents NGOs in policymaking through coordinated sector consultations. Research identified multiple examples, including CONGOMA’s coordination of stakeholder input during amendments to the NGO Act, facilitation of NGO participation in the Malawi 2063 national development framework, and organization of collective advocacy on fiscal and taxation proposals affecting donor-funded NGOs. During the NGO Act amendment process, CONGOMA convened consultations, disseminated draft provisions, and channeled member feedback to regulators. While leadership described its role as facilitative, one respondent argued that “CONGOMA mobilized CSOs to support the bill,” reflecting differing perceptions of its independence and raising concerns that it aligned too closely with the regulator’s positions. In contrast, NGOs widely described CONGOMA’s role in the Malawi 2063 consultations as “a useful channel for structured civil society input into national planning,” highlighting its capacity to consolidate diverse sector perspectives into coherent submissions. Similarly, during debates over taxation of donor-funded resources, CONGOMA convened NGOs and engaged in collective outreach, with one stakeholder noting that it “helped unify the sector position and engage ministries collectively.” At the same time, some research respondents expressed concern that close cooperation with regulators may influence how sector views are framed, while smaller organizations questioned CONGOMA’s responsiveness to localized civic space challenges, including political harassment and intimidation. Together, these examples

suggest that while CONGOMA can make positive contributions to national policy debates, its responsiveness is perceived as uneven across different segments of the sector, reflecting ongoing tension between its role as a sector representative and its function as an intermediary within state-led policy processes.

In **Kazakhstan**, the CAK is embedded within key state mechanisms to influence sectoral policymaking. Under its multi-year strategic partnership with the Ministry of Culture and Information, CAK organizes national Civic Forums where NGO proposals for further development of the sector are compiled and submitted to the government. Research also indicates that the CAK has been involved in working groups and substantive discussions on state social contracting procedures and changes to the broader NGO regulatory framework, with consultations occurring mostly within state-organized platforms. Using these formal partnership arrangements with the government, CAK positions itself as an intermediary for dialogue between ministries and NGOs. Moreover, CAK's own publications describe this function as integrating civil society perspectives into state decision-making. At the same time, research indicates that the mechanisms the CAK uses to formulate and coordinate its positions remain insufficiently transparent, including to some representatives of regional civil alliances who reported limited access to draft legislative texts and negotiation details. As an example, research respondents cited the CAK's involvement in the 2025 draft Law on NGOs, noting that although CAK promoted the draft law as a breakthrough reform, it did not circulate the draft to members for input and discussed it only in general terms. Research also indicates independent NGOs can be marginalized due to their often critical views on certain policies and their unwillingness to stay within specific state-defined discussion parameters, while the CAK "is more likely to adapt the sector's position to acceptable boundaries than to advocate [for] issues that are inconvenient for the state."

In **Botswana**, BOCONGO's engagement on policymaking includes member consultations, capacity building, and consultative exchanges between its members and government. Respondents cited BOCONGO's advocacy around recent constitutional review processes, noting that "BOCONGO actively engaged and played a significant advocacy role in collective action which contributed to the successful rejection of the Draft Amended Constitution by Parliament in 2024." BOCONGO also nominates its members to serve on technical working groups to inform policymaking and legislation on an array of issues, including migration, the environment, and gender-based violence. At the same time, some respondents stated that they felt BOCONGO was less active in promoting advocacy initiatives, coordinating policy input from grassroots organizations, and supporting human rights issues.

In **Nepal**, no law designates the NFN as an official interlocutor between civil society and the state, and the federation does not operate through government-created coordination platforms. However, research finds that regulators tend to treat NFN as the

predominant national umbrella organization due to its size and influence, which some NGOs and networks view as potentially reducing their voice in policy discussions. Despite these limitations, NFN's engagement consists of member consultations, provincial and district assemblies, and coalition-building among NGOs and networks. Members generally view the federation's role as enabling collective advocacy and dialogue. Respondents also cited NFN's engagement in drafting and providing input on NGO-related laws and policies at provincial and local levels, including partnership with Ganda ki Province in developing a Partnership Policy, as well as district-level participation in local law formulation. This approach allows a wider range of organizations to contribute to policy discussions and illustrates how limited state involvement can potentially enable more pluralistic representation of sector views. As one research respondent observed, "While it collaborates with government ministries and platforms for policy engagement and civic space advocacy, this engagement enhances NFN's ability to represent civil society's collective voice in policy discussions, ensuring that government actions consider civil society perspectives rather than dictate them." At the same time, NFN leaders and several NGOs noted increasing reluctance from government actors to engage in open dialogue, particularly on civic freedoms and regulatory reform. Rather than seeking reduced state involvement, research respondents emphasized the need for more structured and meaningful engagement that preserves independence while strengthening accountability.

In addition to influencing policymaking, state involvement also affects how NGO representative bodies promote NGO self-regulation, particularly when statutory coordination roles overlap with compliance functions.

## F. Role in Promoting NGO Self-regulation

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NGO representative bodies also play a role in NGO self-regulation through the promotion and implementation of codes of conduct, ethics frameworks, and other types of peer coordination mechanisms.

In some contexts, NGO self-regulation forms part of the overall state regulatory framework. For example, NaCoNGO in **Tanzania** is responsible for implementing the statutory NGO Code of Conduct, compliance with which is mandatory. Violations are subject to administrative penalties under the NGO Act, and although these are not imposed in practice, this positions self-regulation as an extension of formal oversight rather than a sector-led, voluntary initiative.

Promoting self-regulation falls within ECSOC's statutory mandate in **Ethiopia**, but capacity constraints have limited its effectiveness. Proclamation No. 1113/2019 defines

self-regulation as a “mandatory regulatory system led by a voluntary code of conduct,” combining voluntary sector standards with legally binding expectations. Although EC-SOC developed a Code of Conduct soon after its establishment, enforcement mechanisms have progressed slowly, and the Code Observance Panel responsible for implementation is not operational. The state regulator, ACSO, issued a directive requiring CSOs to comply with the Code, which may promote enforcement even as ECSOC’s institutional capacity remains limited.

In **Sierra Leone**, SLANGO’s work focuses mainly on registration, reporting, and verification processes required by law rather than promoting its sector-wide code of conduct. Research respondents described these activities as administrative and top-down, suggesting that the organization’s embedded role in state compliance efforts limits its capacity to promote independent self-regulatory initiatives and collective sector-led accountability.

CONGOMA in **Malawi** promotes self-regulation through a sector-wide Code of Conduct and a governance framework that allows internal review of alleged misconduct and sanctions, including warnings or suspension of membership benefits. In addition, CONGOMA carries out membership vetting and organizational governance assessments that influence which organizations are recognized as part of the formal NGO community. While some stakeholders view these mechanisms as strengthening professionalism and credibility, other advocacy-focused organizations reported that they can be intrusive and can potentially affect relationships with the state regulator, NGORA. Moreover, research respondents described this dynamic as a form of “soft” regulation, where peer accountability mechanisms may influence organizational behavior in a similar fashion as formal oversight.

Even in cases where NGO representative bodies are established voluntarily, their role in sector self-regulation varies depending on the degree and nature of state involvement. In **Kazakhstan**, the CAK’s engagement with self-regulation initiatives, such as ethical standards or codes of conduct, has

## Summary: Role in Self-Regulation

1

**Tanzania:** Represents NGOs in policymaking through coordinated sector consultations.

**Ethiopia:** Mandated to promote self-regulation and developed voluntary Code of Conduct; enforcement limited.

2

**Sierra Leone:** Issued Code of Conduct; enforcement limited.

**Malawi:** Implements voluntary Code of Conduct; conducts membership vetting and peer assessments.

3

**Kazakhstan:** Limited engagement with self-regulation.

4

**Nepal:** Developed voluntary Code of Conduct; hosts participatory member assemblies.

**Botswana:** Developed voluntary Code of Conduct covering transparency, governance, and accountability, but engagement has been minimal.

remained limited, with research indicating that institutional priorities focus more on legal literacy and activities linked to its government-supported programs.

In **Nepal**, however, self-regulation is based on member participation, with minimal state involvement. The NFN has developed voluntary self-regulation guidelines and a Code of Conduct, and research indicates that annual assemblies and district-level engagement offer space for reflection, peer learning, and collective responses to sectoral governance challenges. However, respondents emphasized that self-regulation remains largely voluntary and internally driven, with limited formal enforcement mechanisms. While research notes uneven implementation, this participatory model illustrates how weaker state involvement can allow sector norms to develop more organically.

Uneven implementation of self-regulation mechanisms also remains a challenge in **Botswana**. BOCONGO developed and issued a Code of Conduct covering voluntary principles for NGOs to improve transparency, governance, and accountability. Respondents indicated that engagement with the Code within the sector has been minimal and that a lack of monitoring and follow-up mechanisms may pose a challenge to its implementation.

These dynamics in self-regulation are closely connected to how NGO representative bodies engage with independent networks, affecting whether relationships are collaborative, competitive, or constrained.

## G. Relationship with Independent Networks

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The relationship between NGO representative bodies and independent networks often reflects the degree of state involvement in their mandate, funding, and institutional positioning.

In **Tanzania**, NaCoNGO's exclusive statutory mandate affects but does not eliminate the operational space for independent networks. Several thematic and sectoral networks operate independently while being NaCoNGO members, and research did not identify evidence that NaCoNGO actively crowds out thematic networks. Instead, research respondents described a layered ecosystem in which NaCoNGO performs national-level coordination, while specialized networks pursue sector-specific advocacy and capacity building. At the same time, some NGOs expressed greater confidence in independent umbrella organizations than in NaCoNGO, while some networks questioned the added value of NaCoNGO's intermediary role and suggested that there would be limited practical impact if it ceased operating.

In **Ethiopia**, relationships between ECSOC and independent networks are evolving. Following legal reforms that enabled the rapid growth of civil society networks and led to

ECSOC's creation as a statutory NGO representative body, major networks joined its executive structures, creating institutional overlap with existing networks. Many independent networks view ECSOC as complementary to their activities and note that collaboration occurs frequently. At the same time, some respondents described ECSOC as competing with independent networks for projects and visibility, while others characterized engagement as sporadic and event-based rather than strategic. In other cases, NGO representative bodies are strongly associated with administrative coordination, shaping relationships with networks around compliance rather than advocacy.

The relationship between SLANGO and independent networks in **Sierra Leone** is largely centralized and transactional. According to one research respondent, "They contact us when they need documents, not when they need ideas or partnership." Coordination meetings and policy discussions are primarily concentrated in the capital, creating practical barriers for provincial organizations due to travel costs, limited access to information, and reduced opportunities to influence agendas. Research respondents reported that engagement with SLANGO is often linked to registration verification and compliance communication rather than joint advocacy or collective agenda setting, with several networks describing interactions as procedural rather than collaborative. While the research did not present strong evidence that SLANGO crowds out independent networks, some organizations have chosen to operate through informal coalitions or parallel networks outside of SLANGO's structure.

In **Malawi**, the research provided limited detail on day-to-day collaboration between CONGOMA and independent networks, but a representative of the state regulator, NGORA, views CONGOMA as the primary coordination interface with civil society. Further, the respondent indicated that NGORA does not typically engage directly with independent NGO networks outside of CONGOMA's umbrella structure, suggesting an institutional expectation that networks should channel engagement through the umbrella body.

Another pattern appears when state-supported NGO representative bodies operate primarily through formal consultation channels. In **Kazakhstan**, the CAK's institutional role within national consultation platforms appears to impact its interaction with independent networks. Research indicates that cooperation usually occurs within formal settings such as consultative councils, working groups, and national dialogue events, where CAK can facilitate access to government officials and occasionally support communication between independent experts and decision-makers. At the same time, independent networks described the relationship with the CAK as functional rather than partnership-based, noting that they often develop parallel coalitions and separate advocacy strategies. Respondents also emphasized that engagement tends to be sporadic and issue-specific, with no sustained coordination mechanism linking the CAK and independent networks. Respondents pointed to differences in thematic expertise and

trust, with some perceiving the CAK as prioritizing relations with the state over representing diverse or critical perspectives.

A more restrictive variation appears in **Uzbekistan**, where heavy state involvement and limited institutional openness inhibit engagement with independent or informal networks. While such networks do exist, they often operate with limited space and visibility. Research suggests that interaction between NANNOUz and these networks is minimal, reflecting both the constrained civic space in Uzbekistan and the opaque governance of the umbrella body itself. In this context, independent or informal networks tend to work with NANNOUz only when seeking to access government-led discussions on sector-specific initiatives rather than as part of intentional collaboration with the umbrella body.

**Nepal** represents a more pluralistic model. Independent networks such as the Dalit NGO Federation and Consortium Nepal emerged to pursue thematic advocacy that members felt was not fully reflected within NFN's broad coordination mandate. Notably, NFN membership is open to all NGOs, but not informal issue-based and thematic networks. However, rather than competing directly, these networks reported collaborating with NFN on joint advocacy efforts, including constitutional reform consultations and civic space initiatives, while maintaining operational independence. Research respondents emphasized that NFN's credibility with government and donors helps amplify thematic voices, although collaboration is often issue-based and uneven.

Similarly, in **Botswana**, independent networks such as the Botswana Network of AIDS Service Organisations (BONASO), the Botswana Council of Community-Based Organisations (BOCOBONET), and the Ngamiland Council of NGOs (NCONGO) represent thematic or regional constituencies within the broader NGO sector. Research respondents noted that BOCONGO has collaborated with independent networks through capacity building and coordination on public policy processes. While the research did not indicate that BOCONGO crowds out these networks, some research respondents suggested that BOCONGO has at times competed with both NGOs and independent networks for funding.

## H. Considerations Under International Law

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Article 22 of the International Covenant on Civil and Political Rights (ICCPR) guarantees the freedom of association, which protects the right to form, join, and operate NGOs without undue interference. States parties to the ICCPR must undertake the necessary steps, including adopting laws or other measures, to uphold the right to freedom of association.<sup>1</sup> International and regional human rights mechanisms<sup>2</sup> have enumerated the following standards to uphold this right that are relevant to NGO representative bodies and networks:

### Membership in NGO umbrella bodies should be voluntary

The freedom of association encompasses the freedom not to associate. The U.N. Special Rapporteur for the Freedom of Peaceful Assembly and Association has stated that “An important component of the right to freedom of association is that no one may be compelled to belong to an association.” The African Commission on Human and Peoples’ Rights’ (ACHPR) Guidelines on Freedom of Association and Assembly in Africa similarly provide that “no one may be compelled to join an association.” Further, “the decision to form or not to form federations shall be made freely by civil society actors. The state shall not stipulate by law the existence of particular or exclusive regional or national federations of associations.” Requiring NGOs to form or join a designated NGO umbrella body contravenes these standards and violates their right to freely determine how and whether to associate.

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<sup>1</sup> Each country featured in this report has ratified or acceded to the ICCPR: Botswana (2000), Ethiopia (1993), Kazakhstan (2006), Malawi (1993), Nepal (1991), Sierra Leone (1996), Tanzania (1976), and Uzbekistan (2008).

<sup>2</sup> With reference to Article 10 of the African Charter on Human and Peoples’ Rights protecting the right to associate, the African Commission on Human and Peoples’ Rights has clarified that restrictions on the right to associate must meet the same conditions prescribed under the ICCPR.



Requiring NGOs to form or join a designated NGO umbrella body contravenes these standards and violates their right to freely determine how and whether to associate.

## ■ Fees must be non-onerous

The UNSR has recognized as a best practice administrative procedures that are “simple, non-onerous or even free of charge.” The ACHPR has noted that registration and administrative fees should be “modest” and should not “have the effect of deterring associations from registering in practice.” If they are applied, membership fees for NGO representative bodies should be non-onerous, especially if membership is mandated by law. Even limited fees can pose a substantial burden for NGOs, especially small organizations with limited financial resources.

## ■ Registration procedures should not be burdensome

As stated by the ACHPR, “Registration procedures shall be simple, clear, non-discriminatory and non-burdensome.” To accomplish this, “[o]nly one body should be tasked with registering associations.” In some contexts, NGOs are required to register with both the NGO umbrella body and the NGO registrar, which contravenes these standards and imposes an undue administrative burden on both NGOs and representative bodies.

# I. Summary of Lessons Learned

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Across the seven dimensions examined—establishment, governance and leadership, funding, oversight, policymaking, self-regulation, and relationships with independent networks—several cross-cutting lessons emerge on how state involvement shapes the role and effectiveness of NGO representative bodies:

## ■ 1. Statutory authority determines long-term independence, legitimacy, and function.

The legal authority granted to a representative body can be decisive. In some of the cases studied, representative bodies were granted statutory authority to coordinate the NGO sector from the outset, while in others, representative bodies that began as voluntary initiatives were later by law granted authority, transforming them into national coordination and compliance intermediaries. At the same time, formal institutional backing does not automatically confer legitimacy to these bodies for sector representation, particularly when representative bodies also contribute to sectoral oversight or regulatory functions. By contrast, voluntarily formed bodies tend to retain stronger member-driven mandates and advocacy roles, even when governments later treat them as de facto interlocutors.

## ■ 2. Indirect state influence on governance can incentivize caution.

Even where governance structures are formally independent, the state can influence leadership behavior through funding relationships, institutional recognition, and incentives for cooperation. In several of the country cases examined, these dynamics en-

couraged risk-averse, consensus-oriented leadership and discouraged confrontational advocacy, particularly in politically sensitive contexts.

### **3. Funding influences not only priorities and accountability, but also competition, perceived conflicts of interest, and sector trust.**

Reliance on state funding or state-linked partnerships can align NGO representative bodies more closely with government priorities, while donor or member-based funding models tend to offer greater autonomy. However, donor dependence can still generate competition with member NGOs and networks when representative bodies seek project funding from the same pools, undermining perceived neutrality and trust. Compounding these dynamics, several representative bodies operate with unstable funding that constrains their effectiveness, while others influence members' access to resources indirectly through endorsement or gatekeeping functions that raise further questions of fairness and accountability.

### **4. Integration into oversight systems can blur representation and regulation, weakening legitimacy and member value.**

When NGO representative bodies are responsible for registration, compliance, or monitoring, their role as sector advocates can be constrained. In these contexts, engagement with NGOs may be shaped by administrative requirements, which may limit trust, undermine perceived legitimacy, and reduce space for independent representation. When NGOs engage primarily because they are required to do so, representative bodies may struggle to demonstrate clear value to members beyond facilitating compliance.

### **5. State-defined policymaking intermediaries can concentrate representation and limit civil society input.**

In several of the case studies, state involvement determined how NGO representative bodies participate in policymaking, often privileging formal consultation platforms and recognized intermediaries. While this can facilitate access, it may also concentrate influence and limit the diversity of civil society voices reflected in policy processes. The country cases illustrate that representative bodies are more effective when mobilizing policy input from members and broader civil society, while those that primarily relay or legitimize state priorities play a more limited representative role.

### **6. Self-regulation mandated by law is an extension of oversight.**

Where NGO self-regulation is mandated by law, it functions as an additional layer of statutory regulation, even if formal enforcement remains limited in practice. More voluntary models allow for participatory standard-setting by NGOs but often face challenges with implementation and enforcement.

## **7. State recognition shapes relationships with independent networks and the overall structure of civil society representation.**

Formal or informal state recognition of a single NGO representative body as the primary interlocutor can limit the voice and representation of independent networks. They are often incentivized, or required, to engage through the designated NGO representative, potentially narrowing policy engagement to specific parameters defined by the state and limiting pluralism. In more open contexts, NGO representative bodies can act as conveners that amplify diverse voices, but government institutions may still treat certain representative bodies as the primary interlocutor over other networks.

# Recommendations

Below are strategic recommendations to promote civil society independence and voice in NGO representative bodies. They highlight actions donors, national governments, and civil society can take to respond to state involvement in NGO representative bodies and to support these bodies to effectively represent the NGO sector.

## Donors

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### 1. Map and analyze civil society representative bodies and state involvement when designing interventions:

Conduct context-specific analysis of NGO representative bodies and civil society networks, with a particular focus on their establishment, governance and leadership, funding, roles in oversight and policymaking, and relationships with independent networks. This analysis should assess how state involvement influences incentives, representation, and power dynamics within the sector, and how proposed interventions may alter those dynamics.

### 2. Diversify funding and access pathways:

Develop pathways to fund NGOs and independent networks directly. Ensure that donor consultation and validation processes include multiple entry points, especially for organizations working on sensitive or rights-based issues and grassroots groups.

### 3. Facilitate networking:

Where appropriate, support alternative mechanisms for civil society networking, such as independent forums and consultations. Where networking is not possible through an NGO representative body or only available to a limited subset of NGOs, donors can consider facilitating alternative spaces for NGO networking, including using the donor's convening power to bring NGOs together.

### 4. Support collaboration across networks and umbrella bodies, including those with state involvement:

This can include supporting joint platforms, coalitions, and other coordination mechanisms that foster the development of shared policy positions without requiring organizations to align under a single state-supported structure. Consider flexible funding that covers institutional costs for independent networks, enabling them to invest in developing expertise and strengthen their capacity.

## 5. Strengthen civil society resilience:

In cases where NGOs face regulatory restrictions, including by government-aligned representative bodies, support programming that assists NGOs with navigating complex legal environments so they can continue to operate and pursue their missions.

## 6. Build civil society capacity to promote enabling NGO legislation:

Help civil society to advocate for enabling legal frameworks that reinforce umbrella bodies' independence and adhere to international standards, such as voluntary NGO membership in a designated government-aligned representative body. This can include facilitating NGO coalition building, education, and advocacy on the legal framework for NGOs, as well as rapid response initiatives to respond to emerging regulatory threats.

# National Governments

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## 1. Enable pluralism:

Legally permit and facilitate the formation of multiple, independent NGO representative bodies and coalitions. Recognize diverse forms of representation, including issue-based, regional, and constituency-specific networks. Avoid delegating exclusive representational mandates to a single umbrella organization.

## 2. Provide financial support that does not interfere with representation:

Resource constraints can prevent NGO umbrella bodies from effectively carrying out their mandates, and governments should provide them with open and transparent financial and logistical support. However, state support should not come with expectations that NGO representative bodies align their activities with government priorities or refrain from advocating for positions that differ from official policy.

## 3. Avoid regulation by proxy:

Where NGO representative bodies assist with regulation, this can undermine their perceived legitimacy and ability to represent the sector. Avoid delegating regulation, oversight, and monitoring functions to NGO representative bodies and support their mandate to focus on representation of the sector.

## 4. Solicit diverse input from civil society:

Consult with civil society stakeholders to understand how NGO representative bodies impact the sector. Input from a diverse spectrum of NGOs can support the development of policy responses to help NGO representative bodies more effectively support the NGO sector.

## ■ 5. Support genuine self-regulation:

NGO self-regulation through voluntary Codes of Conduct can strengthen NGOs' adherence to good governance standards and build public trust in the sector. Governments can provide funding and logistical support to NGO representative bodies to consult with NGOs and develop voluntary self-regulatory mechanisms that meet the sector's needs. However, these mechanisms should not be linked with state mandates or enforcement.

## ■ 6. Promote financial sustainability:

Support initiatives to develop domestic resource mobilization, including social enterprise, corporate social responsibility, and domestic philanthropy. Enabling new approaches can provide NGO representative bodies and their members with a more diverse set of options to strengthen their sustainability and avoid the need for competition over the same funding pools.

## ■ 7. Institutionalize public accountability:

Where governments formally recognize or resource NGO representative bodies, ensure transparent governance structures, regular member consultations, and publicly available reports on activities and finances, including budgets and criteria for sub-grants or recommendations. Ensure that participation in policymaking processes is open and competitive, rather than routed through a single intermediary.

# Civil Society

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## ■ 1. Advocate for adherence to international standards:

Where appropriate, advocate with policymakers and government-aligned NGO representative bodies to ensure adherence to relevant international and regional standards (see "H. Considerations under International Law"):

- **Membership should be voluntary.** The state should not require NGOs to join a designated NGO representative body, as this violates their freedom of association, including the right to determine how and whether to associate.
- **Fees, if any, should be non-onerous.** Even modest fees can pose a substantial financial burden, especially for small organizations.
- **Registration.** NGOs should not be required to register with multiple entities – such as both a government-aligned NGO representative body and NGO registrar – as this imposes an undue administrative burden on NGOs and representative bodies.

## ■ 2. Promote safeguards and transparency:

Advocate for transparent and participatory mechanisms for electing board members and committee representatives of government-aligned NGO representative bodies, ensuring equitable representation of diverse organizations. As a safeguard against indirect state involvement, urge all NGO representative bodies to establish rules on whether their leaders can hold political party membership, accept state employment, or receive political appointments.

## ■ 3. Strengthen horizontal solidarity:

Build peer-to-peer networks and coalitions that do not depend on official recognition or centralized leadership. Share information informally on regulatory challenges, funding barriers, and engagement strategies.

## ■ 4. Document and communicate:

NGOs should document and raise awareness of best practices for NGO representative bodies to effectively represent the sector. To address concerns about over-regulation, document incidents of managed participation, resource gatekeeping, or rights violations. NGOs can raise awareness of these issues with regional and international human rights mechanisms; these include:

- **The African Commission on Human and Peoples' Rights** – through the Special Rapporteur on Human Rights Defenders and Focal Point on Reprisals in Africa, and the Special Rapporteur's Support Group for the promotion and effective implementation of the Guidelines on Freedom of Association and Assembly in Africa.
- **The U.N. Special Rapporteur on the Freedoms of Peaceful Assembly and Association**.

# Appendices

Appendix A: Methodology	33
Appendix B: Features of State Involved NGO Representative Bodies	35
1. Networks Established By Statute	35
2. Networks Established by NGOs and Later Recognized by Statute or Policy	36
3. State Recognized Policy Intermediaries	37
4. Voluntary Representative Bodies	38
Appendix C: Summary of NGO Representative Bodies Covered in this Report	39
1. Tanzania – National Council of Non-Governmental Organizations	39
2. Ethiopia – Ethiopian Civil Society Organizations Council	41
3. Sierra Leone – Sierra Leone Association of Non-Governmental Organisations	44
4. Malawi – Council for Non-Governmental Organisations in Malawi	46
5. Kazakhstan – Civil Alliance of Kazakhstan	48
6. Uzbekistan - National Association of Non-governmental Non-commercial Organizations of Uzbekistan	50
7. Nepal – NGO Federation of Nepal	52
8. Botswana – Botswana Council of Non-Governmental Organisations	54

# Appendix A: Methodology

## 1. Design & Scope

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This study draws on country-level research conducted in Tanzania, Ethiopia, Sierra Leone, Malawi, Kazakhstan, Uzbekistan, Nepal, and Botswana. It examines how NGO representative bodies operate in practice and how state involvement shapes their structure, roles, and relationships within the broader NGO sector. This research was designed as a comparative qualitative study aimed at identifying institutional patterns and dynamics across diverse contexts.

The research focuses on capturing informed perspectives from key actors within each country's NGO sector and related institutions. By examining multiple cases, the study identifies common challenges, governance arrangements, and state-sector dynamics that shape how these representative bodies function in practice.

## 2. Country Selection

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The research targeted eight countries to capture variation across regions as well as differences in regulatory environments and institutional frameworks governing civil society. The sample includes countries from sub-Saharan Africa (Botswana, Ethiopia, Malawi, Sierra Leone, and Tanzania), Central Asia (Kazakhstan and Uzbekistan), and South Asia (Nepal).

Selection was also informed by the presence of identifiable representative bodies within the NGO sector, as well as the feasibility of conducting country-level research through ICNL's networks and connection with local partners. The goal of this selection strategy was to leverage ICNL's connections in select countries to examine how different institutional models of representative body function under varying political and regulatory environments.

## 3. Research Implementation

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The research drew on country-level studies conducted in partnership with local civil society organizations or individual researchers with expertise in the NGO sector. Local partners contributed contextual knowledge and facilitated access to representatives of other NGOs, the NGO representative bodies, independent networks, and, where possible, government officials.

Researchers combined desk research with semi-structured interviews or focus group discussions guided by interview templates provided by ICNL. Desk research reviewed laws and regulations, policy documents, sector reports, and relevant academic literature. Interviews and focus group discussions examined how representative bodies operate in practice and how state involvement shapes their structure, roles, and relationships with the broader NGO sector, while allowing participants to raise issues they considered important.

Across the eight countries, researchers consulted 127 respondents to capture informed perspectives from representatives of NGOs and independent networks, including organizations of different sizes and thematic focus areas, as well as NGO representative body staff and leadership and NGO regulators, where feasible. Discussions explored governance arrangements, funding structures, policymaking participation, relationships with regulators, and perceptions of influence on civic space and sector coordination by government.

## 4. Confidentiality & Limitations

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Interviews were conducted on a confidential basis, and the research team presents all quotations in the report anonymously to protect privacy and encourage candid discussion of sensitive dynamics.

As with any comparative qualitative study, the depth of evidence varies across countries due to differences in access to respondents, sector structure, availability of official documents, and the detail of interviews.<sup>3</sup> The study therefore does not aim to present statistically generalizable findings. Rather, it seeks to provide insight into key patterns, practices, and differences in how representative bodies function, the challenges they face, and the ways they interact with the broader NGO sector.

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<sup>3</sup> ICNL worked with local partners to conduct field research in six countries (Ethiopia, Kazakhstan, Malawi, Nepal, Sierra Leone, and Tanzania). In Botswana and Uzbekistan, ICNL conducted its own interviews and surveys of local NGOs and other stakeholders, as well as desk research.

# Appendix B: Features of State Involved NGO Representative Bodies

## 1. Networks Established by Statute

1

Network	Establishment	Governance & Leadership	Funding	Role in Sector Oversight	Role in Policymaking	Role in Promoting Self-Regulation
<b>TANZANIA</b> National Council of NGOs (NaCoNGO)	Established by NGO Act as sector’s formal coordinating body. Has exclusive powers to exercise function granted to it by the Act. Membership is automatic for all NGOs.	Governed by a National Council elected by members and an Executive Committee and managed by a Secretariat. Supervised by government NGO Coordination Board.	Donor funding; previously collected membership fees.	Monitors member reporting and compliance under the NGO Act.	Serves as an intermediary in policymaking; engages regulators through formal frameworks.	Maintains Code of Conduct imposed by statute; compliance with the Code is mandatory. Responsible for overseeing compliance.
<b>ETHIOPIA</b> Ethiopian Civil Society Organizations Council (ECSOC)	Established by the Organizations of Civil Societies Proclamation No. 1113/2019.	Governed by General Assembly of 300 founding members and an Executive Committee that is accountable to the General Assembly; managed by a Secretariat.	Membership fees; donor funding (previously); no active donor-funded projects.	No formal oversight role; empowered to advise state regulator; state-sector intermediary; nominates regulator Board members.	Serves as state designated policy intermediary; mobilizes members; contributes to legal reforms and regulatory amendments.	Mandated to promote self-regulation; developed voluntary Code of Conduct; enforcement limited to date.

## 2. Networks Established by NGOs and Later Recognized by Statute or Policy

2

Network	Establishment	Governance & Leadership	Funding	Role in Sector Oversight	Role in Policymaking	Role in Promoting Self-Regulation
<b>SIERRA LEONE</b> Sierra Leone Association of Non-Governmental Organisations (SLANGO)	Registered as independent coalition. National NPO Policy later authorized oversight and policy role. Proof of SLANGO membership is required for NGO registration and renewal under the NGO Policy.	Governed by a Board elected by members' General Assembly; managed by Secretariat.	Membership fees; donor funding; project-linked state funding.	Manages the registration and annual renewal of member NGOs, oversees compliance with documentation requirements, and other regulatory obligations such as tax clearance.	Facilitates dialogue between the NGO sector and government through centralized, government-led platforms.	Issued Code of Conduct; enforcement limited to date.
<b>MALAWI</b> Council for NGOs in Malawi (CONGOMA)	Registered as independent trust. NGO Act later recognized as "designated NGO coordinating body." Membership no longer required by law but treated as de facto requirement by some NGOs.	Governed by a Board of Trustees elected by members' General Assembly; managed by a Secretariat.	Donor funding; membership fees; project-linked state funding.	Advises NGOs on statutory obligations; supports member compliance; conducts internal reviews and organizational assessments.	Supports structured sector consultations; coordinates member input on policy; facilitates member participation in legal and national policy frameworks.	Administers voluntary Code of Conduct; conducts membership vetting; internal review and peer assessments.

### 3. State Recognized Policy Intermediaries

3

Network	Establishment	Governance & Leadership	Funding	Role in Sector Oversight	Role in Policymaking	Role in Promoting Self-Regulation
<b>KAZAKHSTAN</b> Civil Alliance of Kazakhstan (CAK)	Registered as an association of legal entities, it is a state-aligned; state supported platform without statutory mandate. Membership is voluntary.	Internal governance documents not available; operates at the national, regional, and NGO levels.	State funding; membership fees.	No formal oversight role.	Serves as state recognized policy intermediary; organizes civic forums; speaks for sector in government-decision making.	Limited engagement with self-regulation
<b>UZBEKISTAN</b> National Association of Non-Governmental Non-Commercial Organizations of Uzbekistan (NANNOUz)	Registered as a legal entity. Government decrees approve its staffing, salaries, resources, and organizational structure. Government recognizes NANNOUz as the representative body of NGOs in Uzbekistan. Membership is voluntary.	Leadership reportedly appointed or approved by government.	Primarily state funding; donor funding.	No formal oversight role; acts as intermediary for state funding to the sector.	Plays a role in development and implementation of laws and regulations affecting civil society.	No role in sector self-regulation.

## 4. Voluntary Representative Bodies



Network	Establishment	Governance & Leadership	Funding	Role in Sector Oversight	Role in Policymaking	Role in Promoting Self-Regulation
<b>NEPAL</b> NGO Federation of Nepal (NFN)	Registered under the National Directorate Act. Independent; voluntary membership-based association.	Executive Committee elected by representative National Convention; multi-level system of provincial and district administration; managed by a Secretariat.	Membership fees; donor funding; project-linked state funding.	No formal oversight role.	Carries out member-focused advocacy; provincial and district assemblies; coalition-building; provides input on laws and policies.	Voluntary Code of Conduct; participatory member assemblies at provincial and district levels; minimal state involvement.
<b>BOTSWANA</b> Botswana Council of NGOs (BOCONGO)	Independent; registered as a Society; voluntary membership-based organization.	Governed by a Board elected by members' General Assembly; managed by a Secretariat.	Donor funding; state funding; membership fees.	No formal oversight role; supports coordination, training, sector participation.	Conducts member consultations; policy advocacy; nominates members to technical working groups.	Issued voluntary sector Code of Conduct; limited application to date.

# Appendix C: Summary of NGO Representative Bodies Covered in this Report

## 1. Tanzania – National Council of Non-Governmental Organizations

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### ■ Establishment & Legal Status

Tanzania's National Council of Non-Governmental Organizations (NaCoNGO) was established in 2003 under Section 25 of the NGO Act as the country's formal coordinating body. All NGOs registered in Tanzania are automatically members of NaCoNGO.

NaCoNGO possesses statutory exclusivity over national NGO coordination, as the NGO Act further prohibits any other person or organization from performing functions that the Council is empowered to carry out under the Act. This does not prohibit the existence and registration of other umbrella organizations with different functions; however, those organizations will be registered as NGOs and therefore become members of NaCoNGO.

### ■ Organization, Governance, & Leadership

As mandated by the NGO Act, NaCoNGO was initially composed of 30 members appointed by NGOs in Tanzania. This inaugural Council developed and ratified NaCoNGO's governing regulations. The regulations prescribe NaCoNGO's governance and management systems, internal procedures, rules, norms, and regulations governing day-to-day operations. In accordance with the regulations, NaCoNGO maintains an elected leadership structure consisting of its National Council and Executive Committee, which is supported by thematic sub-committees.

- **Council Annual Meeting:** At the Annual meeting, 350 representatives elected from member organizations in each district in Tanzania convene to receive reports from the National Council, provide guidance on sector priorities, elect members to serve on the National Council, and elect NGO representatives to be proposed for appointment to the NGO Coordination Board, which retains supervisory authority over NGOs in Tanzania.
- **National Council:** The governing body of NaCoNGO responsible for oversight, coordination, and representation of all members, elected from among the members at the Annual Meeting.
- **Executive Committee:** Elected from National Council members at the Annual Meeting to provide strategic oversight between Council meetings, supervise the Secretariat, and oversee compliance.

- **Secretariat:** Operational staff responsible for day-to-day operations, led by a Coordinator appointed and overseen by the Executive Committee.

While NaCoNGO's organizational structure is self-determined, it remains subject to the supervisory authority of the NGO Coordination Board, a statutory body established under Tanzania's NGO Act and responsible for the registration, regulation, and compliance oversight of NGOs. The Board therefore retains authority over the organizations that constitute NaCoNGO's membership body.

## ■ Funding & Resources

Despite being established by statute, NaCoNGO receives no direct funding or financial support from the Government of Tanzania. Throughout its history, the Council has relied on membership fees and a combination of local and international donors to support its activities. However, NaCoNGO abolished its membership fee requirement in 2021 following criticism from members over perceived lack of accountability and transparency in NaCoNGO's use of the funds, leaving donors as its sole source of funding.

## ■ Functions & Roles

NaCoNGO is an integral part of Tanzania's NGO oversight framework. NGOs are required by law to submit their annual reports to NaCoNGO as well as the Registrar and NGO Coordination Board. NaCoNGO is also responsible for maintaining a statutory Code of Conduct and promoting adherence among its members. The Code of Conduct sets standards for transparency, accountability, ethical governance, and compliance with national laws, and adherence is mandatory for NaCoNGO members.

NaCoNGO oversees compliance with the code through a three-tier governance structure including district, regional, and national-level ethics committees. Broadly, NaCoNGO's role through the committees is to provide guidance and corrective support for members to ensure they meet reporting and operational requirements under the Code and national legislation. The district and regional committees are members' primary interface for engagement, monitoring, and support at the sub-national level, and the national committee reviews NGO self-assessments and provides recommendations. In cases of non-compliance, the Council may issue warnings to members or, in cases of serious violations, refer them to the NGO Coordination Board or other relevant authorities for formal enforcement.

Under its mandate, NaCoNGO formally advises on NGO legislation and policies, provides training on organizational development and compliance, and facilitates networking and information sharing among NGOs. In practice, its activities tend to emphasize regulatory compliance and coordination rather than advocacy or advancing sectoral reform, though it does retain those as key priorities. While it regularly engages members with updates on legislation and sector initiatives, its capacity to deliver programs and support of members' capacity remains constrained by limited funding.

## 2. Ethiopia – Ethiopian Civil Society Organizations Council

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### ■ Establishment & Legal Status

The Ethiopian Civil Society Organizations Council (ECSOC) is a statutory apex body of civil society organizations (CSOs), established under the Organizations of Civil Societies Proclamation No. 1113/2019. The Proclamation mandates the creation of a council responsible for promoting and enforcing self-regulation within the sector, providing advisory input on the registration and operation of CSOs, and representing and coordinating the activities of CSOs nationwide.

ECSOC was formally established on December 31, 2020, during a founding meeting of 300 CSO representatives convened and coordinated by the Authority for Civil Society Organizations (ACSO), the government agency responsible for the registration and regulation of all CSOs in Ethiopia. These representatives formed ECSOC's initial General Assembly and are recognized as its founding members. Membership in ECSOC is mandatory, and all CSOs registered by ACSO automatically become members.

The Council's legal personality is conferred directly by the Proclamation, rather than through registration as a voluntary association. The Proclamation also defines the relationship between ECSOC and ACSO, including ECSOC's mandate to advise ACSO on the registration and administration of CSOs and its authority to nominate representatives to the ACSO board.

### ■ Organization, Governance, & Leadership

ECSOC's governance framework is established by the Proclamation, which mandates the creation and responsibilities of three administrative organs: the General Assembly, the Executive Committee (EXCOM), and the Secretariat.

- **General Assembly:** The Council's supreme organ comprising the 300 founding CSO representatives, responsible for approving policies, strategic plans, and budgets, as well as supervising the EXCOM and electing its members.
- **Executive Committee:** Elected by and accountable to the General Assembly, composed of 15 members drawn from CSO networks and clusters, including five women, responsible for overseeing the Secretariat, ensuring member services, managing financial compliance, appointing the Secretariat's director and auditor, and nominating ECSOC representatives to the ACSO Board.

- **Secretariat:** Led by a director appointed by EXCOM and supported by 12 staff, responsible for managing day-to-day operations, representing ECSOC externally, facilitating partnerships, and maintaining the Council's official records.

The Council's internal regulations and bylaws are adopted by the General Assembly, and they provide operational details not specified by the Proclamation. These include the composition of each organ, the procedures for decision-making and meetings, staff appointments and responsibilities, and the mechanisms for exercising authority on behalf of ECSOC's member CSOs.

### ■ Funding & Resources

ECSOC's budget comes from member contributions, public collections, income-generating activities, and grants from donors, as provided under the Proclamation and the Council's bylaws. In practice, member contributions are minimal, and ECSOC relies primarily on foreign donor support from international donors and bilateral aid. ECSOC receives no government funding, and it is taking steps to formalize membership fees and explore local resource mobilization in collaboration with ACSO.

### ■ Functions & Roles

ECSOC serves as a central coordinating body for civil society in Ethiopia. It fosters collaboration among member CSOs, facilitates networking within the sector, engages with international partners, and provides a platform for joint initiatives and sector-wide dialogue. Through these mechanisms, the Council enables members to share information, align positions on national and sectoral issues, and engage collectively with government institutions and donors.

In its policy and legal advocacy role, ECSOC mobilizes its members to provide collective input on proposed legislation and regulatory changes and engages with government authorities to influence policy decisions affecting the sector. ECSOC also organizes its members in conducting research to inform engagement with government on policy, and it develops baselines and indicators to monitor the sector's performance and effectiveness in contributing to national development.

Under the Proclamation, ECSOC has a statutory mandate to develop a sector-wide Code of Conduct and promote self-regulation among its members. Soon after ECSOC's establishment, the General Assembly developed and adopted this Code of Conduct, which combines legal requirements with voluntary governance, financial management, and ethical standards. To oversee compliance with the Code, ECSOC has established a Code Observance Panel appointed by the General Assembly, however the Panel is not yet operational. As ECSOC does not exercise any statutory enforcement authority in addition to this Panel, the Code is effectively unenforced.

## Appendix C

In representing the sector more broadly, ECSOC acts on behalf of its members in engagements with government institutions, donors, and other stakeholders, aiming to build and maintain trust in the CSO sector and enhance its visibility, credibility, and public image. The Council participates in sector-wide forums, collaborates with independent CSO networks, and engages collectively on issues affecting the sector beyond just policy recommendations. In doing so, it presents coordinated positions on behalf of the sector with the goal of improving the perception of civil society in Ethiopia.

## 3. Sierra Leone – Sierra Leone Association of Non-Governmental Organisations

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### ■ Establishment & Legal Status

The Sierra Leone Association of Non-Governmental Organisations (SLANGO) was established and registered in 1994 as a voluntary coalition of local and international NGOs with the stated goal of strengthening civil society and coordinating its engagement with government, donors, and other stakeholders.

While SLANGO is not a formal statutory body or regulator, it has assumed a role in registration and oversight responsibilities. SLANGO membership is not statutorily required for NGOs in Sierra Leone. However, under the 2023-2028 NGO Policy Framework administered by the Ministry of Planning and Economic Development (MoPED), proof of SLANGO membership is required for NGO registration and renewal, making it an operational necessity for NGOs that wish to register and carry out operations in Sierra Leone.

### ■ Organization, Governance, & Leadership

SLANGO is a membership-based umbrella organization operating under a constitution ratified by its member organizations. SLANGO implements a Strategic Plan that defines the framework for its membership, decision-making, and operational practices, and it provides for a governance structure consisting of three key organs: the General Assembly, elected leadership, and a Secretariat.

- **General Assembly:** The principal decision-making body composed of all member organizations, responsible for electing SLANGO's leadership.
- **Board:** ten representatives of national and international NGOs elected by the General Assembly for two-year terms, during which they provide strategic direction and represent SLANGO at events and with government.
- **Secretariat:** Administrative staff responsible for day-to-day operations, including registration processing, compliance oversight, coordination activities, and engagement with government authorities, particularly MoPED.

### ■ Funding & Resources

SLANGO's funding base consists primarily of membership and registration fees collected from member organizations, supplemented by some project-based support from development partners and limited institutional support from MoPED. Core operational funding is almost exclusively composed of membership fees, as donor-funded projects are typically linked to specific programs and government funding is linked to specific coordination-related functions, rather than general operational costs. SLANGO does not receive state funding for its general operating costs.

## ■ Functions & Roles

SLANGO's primary functions center on NGO registration, reporting, and verification processes required by government. It manages the registration and annual renewal of member NGOs, overseeing compliance with documentation requirements, which include organizational registration with MoPED, constitutions or bylaws, physical office presence, minimum staffing, and other regulatory obligations such as tax clearance.

In this process, SLANGO acts as an intermediary between NGOs and MoPED, communicating regulatory requirements, verifying documentation, and reporting instances of non-compliance. While it does not directly enforce sanctions, its monitoring directly supports government oversight and alignment with the national NGO Policy. SLANGO reports compliance violations to MoPED, which may then sanction NGOs with warnings, temporary suspensions, or deregistration for failure to meet requirements.

Under MoPED's NGO Policy, SLANGO is tasked with facilitating dialogue between the NGO sector and the government. In practice, it participates in supervisory and coordination committees, attends policy forums, and engages in discussions on sector regulation, compliance requirements, policymaking, and alignment with national development priorities. While sector-wide capacity building is one of SLANGO's stated objectives, its work in this area has been limited.

SLANGO facilitates communication and coordination among its members, primarily through meetings and policy forums. These activities are largely conducted in Freetown and are designed to support sector-wide alignment, dissemination of policy updates, and participation in broader coordinated activities.

For its members, SLANGO membership serves as a marker of legitimacy for donors, confirming that NGOs are registered, compliant with the legal framework, and recognized to operate in Sierra Leone. However, SLANGO does not serve as an intermediary between members and donors for fundraising and networking.

## 4. Malawi – Council for Non-Governmental Organisations in Malawi

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### ■ Establishment & Legal Status

The Council for Non-Governmental Organisations in Malawi (CONGOMA) was established in 1985 to serve as the umbrella body for non-governmental organizations (NGOs) in Malawi. Under the Non-Governmental Organisations Act of 2001 (as amended in 2022), it is legally recognized as the designated NGO coordinating body, mandated to represent and coordinate NGOs while formally interfacing with government and participating in some statutory oversight and registration processes.

CONGOMA has a national membership base comprising registered local and international NGOs operating in Malawi, and its scope spans diverse sectors, including governance, human rights, health, education, agriculture, humanitarian response, gender, and economic development. Following the amendment of the NGO Act, membership in CONGOMA is voluntary, however it is viewed as an operational necessity by some NGOs.

### ■ Organization, Governance, & Leadership

As an umbrella body representing all NGOs in Malawi, CONGOMA operates under its own constitution and internal regulations that are adopted and approved by its membership. While it has official recognition under the NGO Act, CONGOMA's authority to constitute leadership, define strategic priorities, and manage internal affairs is derived from the membership, rather than conferred by statute. CONGOMA's governing architecture contains three principal organs:

- **General Assembly:** The supreme decision-making body comprising all members, responsible for electing the Board and setting policy, strategic direction, and institutional oversight.
- **Board of Trustees:** Elected by and from the membership, the Board provides strategic and fiduciary oversight, appoints the Executive Director, and ensures institutional accountability.
- **Secretariat:** Led by a Board-appointed Executive Director, the Secretariat manages day-to-day programming, coordination, and sector engagement.

### ■ Funding & Resources

CONGOMA's funding base consists primarily of membership fees, donor-supported projects, and partner-supported institutional activities. Core operational funding is derived mainly from annual membership fees, as donor-funded projects are typically tied to specific programs and unavailable for operational costs. CONGOMA receives some

project-linked government support, but it does not receive unrestricted state funding for its general operating costs.

### ■ Functions & Roles

CONGOMA performs both representative and advisory functions, supporting coordination and compliance within the NGO sector. Under Section 25 of the NGO Act, CONGOMA is recognized to coordinate NGOs and to support member capacity-building. It serves as a platform for collective representation, enabling members to present coordinated positions, engage with government and donors, and advocate on sector priorities.

CONGOMA also engages in advisory and support functions by helping understand and comply with statutory obligations under the NGO Act, such as reporting requirements administered by the NGO Regulatory Authority (NGORA). While CONGOMA provides guidance and coordination to its member organizations, formal authority to enforce the statutory requirements rests with NGORA.

Alongside these functions, CONGOMA administers a sector-wide Code of Conduct adopted under its Constitution and approved by its membership. The Code covers financial management, safeguarding, governance, and ethical conduct. CONGOMA addresses alleged breaches through internal sanctions, including warnings, the suspension of membership services, and referral of violations to relevant authorities. CONGOMA also carries out membership vetting and organizational governance assessments, which reinforce standards set out in the Code of Conduct, including governance practices, financial controls, and safeguarding policies.

As a coordinating body for the sector, CONGOMA provides services to its members, including capacity-building, peer learning, and knowledge-sharing initiatives that reinforce ethical and operational standards across the sector. CONGOMA may also issue letters for its member organizations confirming membership or good standing for use with prospective donors or government agencies. Membership also allows participation in sector coordination and policy dialogues that CONGOMA facilitates.

## 5. Kazakhstan – Civil Alliance of Kazakhstan

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### ■ Establishment & Legal Status

The Civil Alliance of Kazakhstan (CAK) formally registered in 2005 as an association of legal entities, created by two existing legal entities to serve as a national NGO umbrella organization. Its formation followed high-level dialogues with government in the early 2000s, during which the idea of a single national NGO umbrella was introduced.

As an association of legal entities, CAK has full legal personality and can act independently in civil legal relations. It is authorized to engage in projects, programs, and other activities. CAK is classified as a small enterprise, with up to five permanent staff members, and it does not maintain registered branches or offices.

### ■ Organization, Governance, & Leadership

CAK's internal governance regulations or formal bylaws are not publicly available, and there is no detailed information on procedures for appointing, electing, or recruiting individuals to leadership positions at the national level. Its governance structure operates across three levels: the national (central), the regional, and the NGO levels.

- **National Level:** The central office of CAK, responsible for strategic positioning, engagement with state and regulatory authorities, participation in state program development and implementation, and the administration of CAK initiatives.
- **Regional Level:** Regional civil alliances operating in all 17 regions of Kazakhstan and in the three cities of republican significance – Almaty, Astana, and Shymkent – as independent legal entities convening local CSOs in their regions, not as subdivisions of CAK.
- **NGO Level:** Individual NGOs participate in CAK indirectly through their membership in the regional civil alliances that primarily constitute CAK's membership body.

CAK's members are primarily regional alliances of NGOs, although individual NGOs and public figures may still apply through an application and review process. CAK claims to cover over 8,000 NGOs nationwide; however, CAK does not publish a public member directory, disclose membership fees or requirements, or clarify formal mechanisms for member participation in governance.

### ■ Funding & Resources

CAK's is primarily funded by government funding mechanisms, rather than member contributions such as fees or donations. It regularly implements projects through state social contracting at both national and local levels, receives grants administered through quasi-state authorities, and participates under multi-year strategic partner-

ship arrangements with government agencies, which contribute to its institutional funding.

## ■ Functions & Roles

CAK's principal function is as a nationwide platform for NGOs to engage in decision-making and policy development. Its activities include participation in public, expert, and advisory councils organized by state bodies and engagement in civic forums at both the regional and national levels. These forums address regulatory frameworks, NGO development, broad civic participation, and the operations of Public Councils, which are state-sanctioned bodies designed to provide public oversight of government institutions and projects. CAK has recently incorporated the UN Sustainable Development Goals framework into its input on state priorities and strategic planning.

Through its multi-year strategic partnerships with the Ministry of Culture and Information, CAK organizes Civic Forums where NGOs compile proposals for sectoral development, which are then submitted to government. It also organizes public hearings and forums on topics such as infrastructure and development projects, contributing to structured state-civil society dialogue. CAK participates in working groups and discussions on state social contracting and broader NGO regulation, primarily within state-organized consultative platforms. It also develops proposals on legislation affecting NGOs, trade unions, and incentives for charitable engagement by businesses, which it submits through the same mechanisms. These roles position CAK as an intermediary between ministries and civil society, facilitating dialogue and policy development.

## 6. Uzbekistan - National Association of Non-governmental Non-commercial Organizations of Uzbekistan

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### ■ Establishment & Legal Status

The National Association of Non-governmental Non-commercial Organizations of Uzbekistan (NANNOUz) was established and registered as a legal entity in 2005 at the initiative of 150 leading non-governmental non-commercial organizations (NNOs) in Uzbekistan. It is the apex umbrella body for NGOs in Uzbekistan. All registered NGOs are eligible to join, though membership is not obligatory.

NANNOUz's role is institutionalized by government decrees that approve its staffing, salaries, resources, and organizational structure. The government recognizes NANNOUz as the representative body of NGOs in Uzbekistan, and it works through NANNOUz in engaging the sector, further linking government to NANNOUz's operations.

### ■ Organization, Governance, & Leadership

Leadership of NANNOUz is reportedly appointed or approved by government authorities. Research indicates that NANNOUz members have no formal or practical input on governance decisions or organizational events. NANNOUz's governance is structured around a leadership team and chairperson. Membership in NANNOUz is not compulsory.

### ■ Funding & Resources

NANNOUz's principal source of funding is state support. It functions both as a direct recipient of state funding and as an intermediary for other NGOs seeking state funds. The organization does not publish budget or financial statements, and its allocation of funds through grants is not transparent, with funding decisions undisclosed to the public.

### ■ Functions & Roles

NANNOUz's primary mission is to represent NNO interests in state bodies and courts, facilitate sector participation in policymaking and public oversight, and mobilize resources to support civil society development. The organization is also responsible for implementing targets under the National Concept on Civil Society Development. Its formal mandate positions it as an intermediary between civil society and the state.

In its role as an intermediary, NANNOUz serves as a gatekeeper for NNOs' access to state resources giving it a central role in the operations and financing of the civil society sector.

## Appendix C

NANNOUz also plays a role in the development and implementation of laws and regulations affecting civil society. Research indicates that NANNOUz does not organize formal consultations for member input in policy discussions, and it often structures events related to policy implementation around government priorities.

NANNOUz's mandate also includes coordination of the civil society sector, which it carries out through forums and other policy events. According to the research, these events provide visibility without influence. Common features include formal roundtables, limited deliberation, and few opportunities for critical discussion.

## 7. Nepal – NGO Federation of Nepal

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### ■ Establishment & Legal Status

The NGO Federation of Nepal (NFN) is a national-level membership-based federation of NGOs. It was founded in 1991 during Nepal's democratic movement as an independent association to represent and coordinate civil society engaged on development efforts across the country. NFN first registered as an independent association under the Association Registration Act before shifting its registration to the National Directorate Act, which confers higher legal status and greater protections.

Under the National Directorate Act, NFN has legal personality as an independent entity, allowing it to enter into agreements, receive funding, and represent the NGO sector with government, donors, and other stakeholders. This status enables NFN to coordinate its members, organize sector advocacy, provide capacity-building support for its members, and act as an intermediary between civil society and state actors.

### ■ Organization, Governance, & Leadership

NFN's governance is defined by its internal constitution, which establishes the framework for leadership, decision-making, internal safeguards, and member coordination across national and sub-national levels. The constitution specifies the roles of administrative bodies that manage NFN's operations and guide its engagement with member organizations, government, and the broader public.

- **National Convention:** NFN's supreme body, convening representatives of all 77 district chapters every three years to elect NFN's Executive Committee and amend its Constitution.
- **Annual General Meeting:** Convenes yearly to approve the Executive Board's annual and audit reports, endorse annual activities, and provide overall strategic guidance.
- **Executive Committee:** NFN's primary executive arm, currently consisting of 51 members elected to three-year terms by the National Convention. It meets every three months to oversee policy development and the implementation of programs.
- **Central Secretariat:** Headed by a Committee appointed Executive Director, responsible for managing the Federation's day-to-day administrative operations.
- **Province Committees:** Established in all seven provinces, each has between seven and nine members elected from district representatives to coordinate and oversee development initiatives, capacity building, and management of resource centers.

- **District Chapters:** Functioning in all 77 districts of Nepal and consisting of between seven and eleven elected members each, responsible for local membership, government liaison, and program implementation.

Membership in NFN is voluntary and open to any registered, non-partisan, and non-religious Nepalese NGO that aligns with the Federation's stated mission of democratic development and human rights. In order to join, members must submit a formal application along with its registration documents to the respective District Chapter before being recommended for central affiliation.

### **Funding & Resources**

NFN's budget relies on modest membership fees proportional to members' income, member contributions, donor-funded projects, and one-time, project-specific government grants. In practice, NFN sustains its operations primarily through donor support, including bilateral and international development partners, though it has increased efforts to mobilize domestic funding through local philanthropy and corporate social responsibility (CSR). NFN receives no guaranteed funding, as direct contributions from the Nepalese government are only through project-specific grants.

### **Functions & Roles**

NFN serves as a leading voice of the NGO sector in Nepal, representing its member organizations in national and sub-national policy forums, consultations, and legislative processes. In that role, it engages with government to advocate for an enabling environment, provides sector-wide recommendations, and collaborates with policymakers on issues related to civic space. NFN maintains a position of formal neutrality in this engagement, and it does not play any role in NGO sector oversight.

NFN's position as a bridge between civil society and the state provides opportunities for members and independent networks to participate in policy dialogues, committees, and consultations. Through this, member NGOs gain visibility and access to decision-making spaces. On the other hand, NFN also supports compliance guidance and advises members on navigating regulatory and administrative processes. This includes providing practical support to members in addressing regulatory and compliance challenges such as VAT disputes and renewal delays.

NFN has developed voluntary self-regulation guidelines and a Code of Conduct to improve accountability, transparency, and credibility among its members. While adherence is voluntary, these frameworks support good governance practices and provide opportunities for members to reinforce trust with donors, government, and other members.

NFN also conducts regular capacity building initiatives for members, including training, workshops, thematic consultations, and promoting sector-wide learning platforms. In addition to strengthening members' operational capacity, it fosters coordination among NGOs and independent networks, enabling collaboration on programming and input on national initiatives, such as the Nepal SDG Forum.

## 8. Botswana – Botswana Council of Non-Governmental Organisations

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### ■ Establishment & Legal Status

The Botswana Council of Non-Governmental Organisations (BOCONGO) was established by NGOs in 1995 as a registered society to serve as a coordinating body for NGOs in Botswana.

BOCONGO remains an independent organization with a voluntary membership model. Potential members must be registered NGOs with the Registrar of Societies, apply for membership, and pay a small membership fee. BOCONGO currently has over 300 registered members.

### ■ Organization, Governance, & Leadership

BOCONGO operates under a constitution that establishes a representative governance structure and defines its leadership bodies. Member organizations determine leadership through an elective Annual General Meeting, and administrative staff led by an Executive Director carry out daily operations. Key organs include:

- **Annual General Meeting:** Brings BOCONGO's member organizations together and serves as the forum where members elect the board members for five-year terms.
- **Board:** Includes the Chairperson, Vice-Chairperson, six NGO representatives who head thematic groups (Democratic Governance; Inclusive Social Policy; Sustainable Environment; Gender and Human Rights; Economic Justice; and Arts and Creative Industry), and six NGO representatives from regional networks (Gaborone; Selebi-Phikwe; Chobe; Francistown; Ngami; and Gantsi).
- **Secretariat:** Consisting of six staff members headed by an Executive Director, responsible for BOCONGO's daily administration and operations.

### ■ Funding & Resources

BOCONGO receives funding from a combination of government support, donor funding, and membership fees. The Government of Botswana provides a fixed amount of unrestricted support each year, although many of the Council's activities operate through specific project funding from international donors.

## ■ Functions & Roles

BOCONGO functions as a coordinating body for NGOs in Botswana. It represents the sector in engagements with government and other stakeholders, supports coordination among member organizations, and facilitates civil society participation in policy discussions. Although BOCONGO primarily focuses on coordination rather than direct project implementation, funding constraints have led it to both coordinate and implement activities, including through partnerships with other organizations and its members.

BOCONGO does not perform any regulatory function for the NGO sector, and it does not enforce compliance or oversight over its members. BOCONGO's Secretariat may engage with the broader regulatory framework governing NGOs on behalf of its members. For example, during the 2025 registration period for societies, it engaged the Registrar of Societies to call for an extension of the registration deadline after members experienced difficulties with the online registration system. Its role in these instances focuses on coordination and representation of members' concerns, rather than regulation.

Similarly, BOCONGO participates in policymaking processes through representation of the sector in policy consultations. The Secretariat, often through the Executive Director, represents the NGO sector in these forums and may nominate representatives from member organizations to contribute their technical expertise. For example, BOCONGO has nominated its members to serve on technical working groups related to gender-based violence and environmental policy. BOCONGO has also participated in debates surrounding the establishment of a Constitutional Court and broader constitutional review processes.

BOCONGO has developed a voluntary Code of Conduct intended to guide the conduct of member organizations in their governance, accountability, and transparency. However, the Code is not widely promoted among members and there are no formal mechanisms to monitor or enforce compliance.

BOCONGO also engages with a number of independent networks in Botswana and around the broader region. BOCONGO is an active member of the Southern African Council of NGOs and Forus International. The Government of Botswana has also established a statutory NGO Council to coordinate relations between government, NGOs, and community-based organizations. BOCONGO sits on the board of this Council.



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