

Private Voluntary Organisations (PVO) Amendment Act, 2025

FREQUENTLY ASKED QUESTIONS



INTRODUCTION AND BACKGROUND

The Private Voluntary Organisations (PVO) Amendment Act, 2025, which was signed into law on 11 April 2025 introducing changes to the regulatory landscape for Non-Governmental Organisations (NGOs) in Zimbabwe. The responses provided in the document are based on official responses and guidance from the Ministry of Public Service, Labour and Social Welfare (MoPSLSW).

UNDERSTANDING THE BASICS

What are Private Voluntary Organisations (PVOs)?

PVOs are entities formed for charitable, social assistance, humanitarian, legal aid, or animal welfare purposes including trusts, associations, institutions, and other bodies working for the public good.

Who is required to register under the PVO Amendment Act, 2025?

Pre-existing Charitable Entities which are entities that were lawfully operating in Zimbabwe before the Act's commencement and are defined as Trusts registered under the Deeds Registries Act or entities that did not rely on public contributions for funding but received funds from any source within or outside Zimbabwe.

Does the PVO Amendment Act affect faith-based organisations or religious institutions?

Only if such organisations engage in public fundraising, receive external funding, or undertake charitable or humanitarian activities outside their primary religious mandate. In such cases, registration may be required.

TRANSITIONAL ARRANGEMENTS AND BOARD RECONSTITUTION

What is the process for reconstituting the PVO Board under the new Act?

The Minister of Public Service Labour and Social Welfare will initiate the appointment of a new PVO Board in line with the provisions of the amended Act.

What is the 90-day transitional period under the Act?

The transitional period is 90 working days excluding weekends and public holidays. This is a time frame given to pre-existing organisations to at least have submitted their applications for them to continue operating failure of which will mean they stop operating until they lodge their application. Early submission is encouraged to avoid delays.

Will pre-existing organisations continue operating during the transition?

Yes. Timely submission of applications is essential to avoid disruptions.

What happens if an organisation fails to register within the 90-day transitional period?

Organisations that will fail to submit their application within the transitional period risk being considered non-compliant. This may lead to suspension of operations, ineligibility to receive funding, or potential penalties and sanctions as outlined in the Act.

Do organisations that applied before 11 April 2025 need to reapply?

No. Organisations that submitted complete applications before 11 April 2025 are not required to reapply unless they wish to amend their application details.

REGISTRATION PROCESS AND REQUIREMENTS

What documentation is required for registration?

Organisations should use the following documents for registration

- Constitution (template provided)
- IDs, CVs and police clearance of the executive committee members
- Public notice draft
- Letter of intent from the Local Authority
- Proof of previous registration status (or minutes of the meeting that led to the formation of the organisation)
- Complete PVO1 form
- Proof of Sources of Funding

What does "BENEFICIAL OWNERSHIP" mean under the Act?

Beneficial ownership refers to any individual who directly or indirectly exercises significant control or influence over a PVO, including through ownership of assets or authority over decision-making processes.

Are recommendation/support letters still required for registration?

Yes. Recommendation letters or stamped letters of intent from local authorities remain part of the application process.

Are there any fees to be paid. If so, how much?

The new Act introduces a registration fee which will be gazetted. Organisations or Prospective Applicants may submit their applications even prior to the gazette of the fees. They will be notified on how to pay once the fees have been gazetted.

Where should NGOs submit their registration applications?

- **Local NGOs:** Submit applications at district social welfare offices.
- **International NGOs:** Submit applications directly to the MoPSLSW office of the Registrar/ Director of Social Development Department.

Can organisations submit applications electronically?

The Ministry is in the process of finalising the development a **Zimbabwe Social Registry System (ZISO)** which will provide online application, tracking system, and grievance handling applications. No specific timelines have been set but the matter is being treated with urgency.

COMPLIANCE AND GOVERNANCE

Are there penalties for operating as an unregistered PVO?

Yes. Operating without registration, where required, may result in penalties including fines, imprisonment, or both. The new Act has civil penalties for non-compliance by PVOs.

What is the appeal process for PVOs under the new Act?

If aggrieved by a decision of the PVO Board (regarding registration, exemption, amendment, or cancellation), a PVO may:

- Submit an appeal to the Minister, who may confirm the Board's decision or refer it back to the Registrar.
- If dissatisfied with the Minister's response, the PVO may appeal to the Administrative Court within 14 days. The Court has the authority to uphold, amend, or overturn the decision.

What are the compliance requirements under the new law regarding submissions of returns?

PVOs are expected to submit **Annual Narrative Reports, Independently Audited Financial Yearly Statements, and Minutes of the Previous Annual General Meeting (AGM)**. Usually these are required 3 months after the turn of the financial year. Challenges such as delays in audit or financial challenges should be communicated with the Registrar.

Will the Registrar have the power to inspect PVOs?

Yes. The Registrar and designated officials may conduct inspections, request documentation, and inquire into a PVO's activities to ensure compliance.

FUNDING AND INTERNATIONAL COMPLIANCE

Can a registered PVO receive foreign funding under the new Act?

Yes. Registered PVOs can receive funding from external sources; however, the source, purpose, and utilisation of such funds must be transparent.

What is the role of NANGO in supporting PVOs under the new law?

NANGO provides guidance, coordination, and technical support to CSOs during this transition. It also advocates for fair implementation, promotes dialogue with authorities, and supports compliance capacity-building for its members.



GET IN TOUCH WITH US

If you have further questions, need clarification, or require support with your registration process under the PVO Amendment Act, 2025, please reach out to your respective **Regional Coordinator** or the **Head Office**.

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