



CSOs Consultation on PVO Registration Experiences Consolidated Narrative Report

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Introduction and Background

The regulatory landscape for Civil Society Organisations (CSOs) in Zimbabwe has undergone significant transformation following the enactment of the Private Voluntary Organisations (PVO) Amendment Act on 11 April 2025. The law introduces new compliance requirements intended to streamline oversight and enhance accountability within the CSO sector. One of its most consequential provisions is the mandatory transition of Trusts and Common Law Universitas into registered PVOs within a three-month timeframe. While the legislation was presented as a mechanism to strengthen governance, its implementation has revealed numerous gaps and ambiguities that require urgent policy attention.

Since the commencement of the transition process, CSOs across Zimbabwe have reported a wide range of operational challenges. These include unclear procedural requirements, lengthy processing timelines, inconsistent interpretation of the law between provinces, limited communication from the Registrar of PVOs, and frequent administrative bottlenecks at district and provincial offices of the Department of Social Development (DSD). At the same time, some organisations have reported isolated positive experiences such as improved engagement with social welfare officers, quicker turnaround times, and receipt of supportive communication.

A notable emerging challenge relates to dual regulation, whereby local authorities require CSOs to secure separate Memoranda of Understanding (MoUs) to operate within their jurisdictions. This practice has generated confusion, duplicated administrative obligations, and in some cases resulted in arbitrary financial demands from councils. Although the Registrar has signalled that forthcoming regulations may clarify this issue, the lack of harmonised guidance continues to strain CSO operations.

Against this backdrop, the National Association of Non-Governmental Organisations (NANGO), in collaboration with Trocaire, convened a CSO Consultation on PVO Experiences Workshop on 11 November 2025 at Bulawayo Rainbow Towers Hotel. The workshop served as a safe space for CSOs to share first-hand experiences, reflect on the operational implications of the Act, and collectively develop recommendations to inform advocacy efforts aimed at ensuring a fair and enabling regulatory environment.

A total of 68 participants drawn from Bulawayo, Midlands, Matabeleland North and South provinces attended the workshop. These participants represented CSOs, community-based organisations and grassroots movements drawn from different thematic clusters for cluster specific unique experiences. Of the attendees, 40 were women, 28 were men, and 3 were persons with disabilities.

Rationale

The implementation of the PVO Amendment Act represents a turning point for civic space in Zimbabwe. Given the critical role CSOs play in service delivery, governance, human rights, humanitarian assistance, and community development, it is essential that the regulatory environment facilitates rather than constrains their operations. The workshop was convened to systematically capture and analyse the experiences of CSOs that have already interacted with the PVO registration system, thereby generating evidence to guide targeted advocacy with key law and policy makers.

Documenting these experiences allows the sector to identify common barriers, emerging risks, and examples of good practice that can inform constructive engagement with the Registrar of PVOs, Department of Social Development, Parliament, and local authorities. Additionally, the workshop provided an opportunity to reflect on the increasingly complex reality of dual regulation and to consider how upcoming regulations may address persistent contradictions in the law's interpretation.

The platform also sought to strengthen collective action and coordination among CSOs, recognising that unified advocacy enhances the sector's ability to influence legal and policy reforms. By creating a space for open dialogue, the workshop contributed to shaping a shared CSO agenda on regulatory governance, compliance readiness, and sustainable operations amidst shifting policy landscapes.

Specific Objectives

The workshop was designed to achieve the following strategic objectives:

1. To gather and document CSO experiences with the PVO registration process since the Act's enactment, highlighting both challenges and positive developments across districts and provinces.
2. To identify procedural, administrative, and policy gaps; including dual regulation by local authorities, and generate practical, evidence-based recommendations to strengthen the registration and compliance environment.
3. To reinforce collective CSO advocacy and coordination in engaging the Registrar of PVOs, relevant ministries, Parliament, and local authorities to ensure transparent, consistent, and fair implementation of the PVO Amendment Act.

Workshop Approach, Methodology and Reach

The workshop adopted a participatory and highly interactive approach that allowed participants to fully engage with the subject matter and contribute detailed insights. The methodology included plenary sessions, PowerPoint-supported presentations, and focus-group discussions structured along provincial lines. Participants were grouped according to their respective provinces; Matabeleland North, Matabeleland South, Midlands, and Bulawayo; to enable them to share experiences within familiar administrative contexts and highlight province-specific trends.

Each focus group responded to a structured framing questions designed to elicit information on the registration experience, interaction with DSD offices, perceived improvements or regressions in service delivery, and identified challenges or gaps requiring redress. This approach ensured comparability of responses and allowed for rich, qualitative data harvesting.

The methodological design ensured that voices from CBOs, large NGOs, emerging organisations, and specialised groups (including persons with disabilities) were captured, allowing the workshop to generate a comprehensive and representative picture of the PVO registration experience in the southern region of Zimbabwe.

Presentation of Issues by Provinces

Matabeleland North Province

Participants have highlighted some encouraging practices within Matabeleland North.

- **Responsiveness of the Department of Social Development (DSD):** The DSD has demonstrated a commendable level of responsiveness and willingness to clarify the requirements for PVO registration.
- **Proactive Outreach:** The province has initiated efforts to reach out to NGOs they previously worked with, as well as other organisations operating in the province. These engagements have been used to inform organizations about the new PVO Amendment Act and encourage them to begin the registration process.
- **Issuance of Confirmation Letters:** Upon submission of PVO applications, the DSD has been issuing confirmation letters to organizations as proof of receipt. These letters have provided organisations with greater confidence when engaging banks or partners while awaiting approval.

Challenges and Negative Observations

Despite the positives, the province continues to face a range of operational and procedural challenges:

- **Capacity Gaps:** In several districts, notable capacity gaps exist within district DSD offices. Some officials are unaware of the provisions of the new Act, resulting in inconsistent guidance and support.
- **Bureaucratic Bottlenecks:** Organisations following up on applications face bureaucratic hurdles, including being referred from one office or official to another. This creates uncertainty as organisations struggle to identify the correct office or officer responsible for providing updates.
- **Problematic Interview Processes:** Interview processes for PVO applicants have raised concern.
 - Some questions asked during interviews are not related to the PVO application process.
 - Applicants have been asked inappropriate personal questions, such as marital status or private life details.
 - In some cases, interviewers (often graduate interns) appeared to solicit job opportunities from applicant organisations.
- **Negative Attitudes:** Some key officials responsible for handling applications have displayed unwelcoming and unhelpful attitudes, making inquiries frustrating for applicants.
- **Letters of Intent Challenges:** Securing Letters of Intent from local authorities has been difficult, with some officials claiming they are unaware of the process and the requirement.
- In other cases, Local Authorities are confused with Memoranda of Understanding (MOUs), leading to unnecessary demands for documents not required by the Act.
- Turnaround times for securing letters of intent have been excessively long, despite the process being intended as a quick, administrative formality.
- **Persistence of MOU Requirements:** In some districts, local authorities are still demanding MOUs from organizations even after they have complied with the PVO Act contrary to the intended streamlined process.
- **Requests for Donor Confirmation:** Some organisations have been asked to demonstrate donor support or secure MOUs from partners and funders, which is not part of the legal requirements.
- **Selective Acceptance of Applications:** DSD offices have communicated that they are currently prioritizing registration applications from organizations implementing 'software programming' (e.g., humanitarian, livelihoods, and social protection programmes).
- Applications from organisations working on democracy, governance, and human rights ('hardware programming') are reportedly being sidelined especially in Lupane district.
- **Budget Declaration Demands:** In Binga District, local authorities have asked organisations to declare their total budget and remit 1% of the budget as a contribution to the local authority, an informal requirement not provided for in law.

Bulawayo Province

Challenges raised by Bulawayo Province participants primarily relate to systemic inefficiencies and inconsistent interpretation of the Act:

- **Incompetence and Limited Knowledge:** DSD officers in Bulawayo have shown limited understanding of the provisions of the new PVO Act and lack proper guidance on how to support applicants or handle submissions.
- **Graduate Interns as Accounting Officers:** Many applications are being handled by graduate interns acting as accounting officers, raising concerns about the adequacy and accuracy of the application reviews.
- **Communication Gaps:** There is a major disconnect between information communicated by head office and what district-level officials tell organizations. Requirements differ significantly depending on which office an applicant interacts with.
- **Bank Requirements:** Banks have been asking for beneficial ownership information as part of Know-Your-Customer (KYC) procedures, creating additional compliance steps for organisations already undergoing PVO registration.
- **Apathy:** Some organisations have opted not to register due to: Funding shortages, and Frustration with the rigorous and inconsistent application process.
- **Alignment to National Development Plans:** During review of applications, there is significant emphasis on ensuring that organizational objectives align with national development plans, sometimes resulting in pressure to amend objectives.

Matabeleland South Province

Organisations operating in Matabeleland South highlighted the following:

- **Confusion Due to the 24 Requirements Circular:** The circular issued in January 2024 listing 24 requirements has remained a major source of confusion. District officers continue to reference it, despite changes under the new PVO Act.
- **Weak Communication and Feedback Systems:** There is poor communication from district officers regarding registration processes and requirements.
- Feedback on application progress is extremely weak, with organisations often left without updates for long periods.
- **Lack of Procedural Clarity:** District officers are unable to provide clear procedural guidance on registration, resulting in organisations navigating the process through trial and error.
- **District-Level Variations:** Organisations prefer to operate in districts considered “more favourable,” where officers are more cooperative or requirements are clearer.
- Districts such as Insiza and Matobo were identified as particularly difficult, demanding more requirements than others or delaying processes unnecessarily.

Midlands Province

Challenges raised in Midlands Province include:

- **Charges for Reference Letters:** Gweru city council made attempts to charge USD \$300 for reference letters required for PVO registration. The city council has previously charged MOU Processing Fees amounting to US\$2,000, included in their local budget tariff schedule. Organisations argue that those costs are prohibitive and exorbitant.
- **Incapacitation and Arbitrary Denial of Registration:** Case reference - DSD officials advised a youth organisation that they should register under the Zimbabwe Youth Council, raising concerns about dual registration and conflicting mandates.
- **Bureaucracy and Delayed Feedback:** Applicants face significant back-and-forth movements between offices with unclear referral pathways and slow feedback.
- **Requests to Change Organisation Names or Objectives:** Some organisations have been instructed to change their names or institutional objectives on the grounds that there are already similar organizations in the same district.
- **Loss of Funding:** One organisation reported losing donor funding as a result of prolonged registration delays.
- **Confusion on Where to Obtain Letters of Intent:** Organisations seeking letters of intent are being referred between different offices, with most officials uncertain about the process or requirements.

Presentation and Categorisation of Challenges by Type

Across the four provinces, challenges were categorised into the following thematic clusters:

Administrative and Procedural Gaps

- Absence of Standard Operating Procedures (SOPs), leading to inconsistent requirements between districts and provinces.
- Missing or lost files due to poor handover systems.
- Excessive paperwork and unclear documentation requirements.
- Lengthy processing and vetting periods.

Knowledge and Capacity Limitations

- Insufficient training of DSD officers, particularly at district level.
- Limited understanding of the PVO Amendment Act among frontline officers.
- Inconsistent or inaccurate responses to CSOs making enquiries.

Attitudinal and Conduct-Related Challenges

- Negative attitudes from some officials.

- Discouragement against using certain terms such as “advocacy.”
- Unprofessional or intimidating interview approaches.

Dual Regulation and Local Authority Hurdles

- Arbitrary MoU fees.
- Preference for hardware over software programmes.
- Demands for levies such as the 1% administrative fee.
- Lack of harmonisation between DSD processes and local council requirements.

Transparency and Communication Weaknesses

- Limited feedback following submission of requirements.
- Lack of clarity on application status.
- Absence of tracking or follow-up systems for applicants.

Rights and Operational Concerns

- Requiring organisations to limit their objectives to a maximum of three.
- Organisations instructed to suspend operations during processing.
- Donor withdrawal due to registration delays.
- Security-oriented vetting processes creating intimidation.

Headline Recommendations

Based on the consolidated insights, the workshop proposed the following high-level recommendations:

- Standardise the PVO registration process by developing and disseminating clear SOPs outlining requirements, timelines, interview procedures, and feedback mechanisms.
- Strengthen the capacity of DSD officers through continuous training and improved institutional knowledge management systems to prevent file loss, duplication, and inconsistent information sharing.
- Review and address the Matabeleland South 24-item vetting checklist, ensuring alignment with national standards and the law.
- Improve communication systems to ensure timely feedback, transparent tracking of applications, and reduction of unnecessary repeated visits by CSOs.
- Harmonise PVO registration with MoU processes, ensuring collaboration between the Ministry of Public Service, Labour and Social Welfare and the Ministry of Local Government to prevent duplication of requirements.
- Strengthen structured engagement platforms between CSOs and policymakers, including regular dialogues, regional convenings, and issue-based consultations.

- Introduce accountability and oversight mechanisms for monitoring registration decisions and addressing grievances related to misconduct or administrative abuse.
- Enhance NANGO's legal and compliance support services, including technical clinics, transition guidance, and advocacy coordination.
- Re-establish NANGO's thematic cluster meetings to promote intra-sector coordination and peer learning.
- Encourage CSOs to undertake scenario planning and organisational risk analysis to strengthen resilience under changing regulatory conditions.
- Sustain momentum through strategic convenings, including the NGO Directors' Summer Retreat and other national dialogues to ensure continuous advocacy engagement with the regulatory authorities.

Conclusion

The CSO Consultation on PVO Experiences Workshop created a critical and timely platform for civil society actors to collectively reflect on their interactions with the new PVO registration system. The discussions revealed significant procedural inconsistencies, capacity gaps, communication weaknesses, and dual-regulation challenges that, if unaddressed, risk undermining the operational effectiveness of CSOs across Zimbabwe. Despite these challenges, the workshop affirmed the sector's willingness to comply with the law while advocating for improvements that uphold transparency, fairness, and proportionality in implementation.

The insights and recommendations emerging from the workshop will inform a broader advocacy agenda aimed at strengthening engagement with the Registrar of PVOs, local authorities, and key policymakers. By addressing the highlighted challenges and adopting the proposed reforms, Zimbabwe can move closer to building a regulatory environment that supports the vital work of CSOs in advancing development, safeguarding rights, and improving community wellbeing.

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