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THE ENABLING AND DISENABLING
ENVIRONMENT
FOR CSO OPERATIONS IN SOMALIA:
A CASE FOR GAROWE AND GALKACYO

ADRA

July 2019

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LIST OF ACRONYMS

AS	Al - Shabaab
CSOs	Civil society organizations
CBOs	Community - Based Organizations
GBV	Gender - based violence
GDP	Gross Domestic Product
FGDs	Focus Group Discussions
FGS	Federal Government of Somalia
IDP	Internally Displaced People
INGOs	International Non - Governmental Organizations
NGOs	Non - Governmental Organizations
PUNSAA	Puntland Non - State Actors Association
SIDRA	Somalia Institute for Development Research and Analysis
SONSA	Somalia Non - State Actors
SONSAF	Somaliland Non - State Actors Forum
SOSCENSA	Somalia South Central Non - State Actors
TAG	The Asha Geele Foundation
UN	United Nations
WASH	Water, Sanitation and Hygiene

EXECUTIVE SUMMARY

A vibrant civil society is essential to the sustenance of any nation's development. In Puntland State of Somalia, the role of civil society groups has been vital in the political, social and economic development of the country. Civil society organizations (CSOs) have assisted in improving the life's quality of the people of Puntland, ensuring good governance, developing the capacity of the government to apply the principles of accountability, transparency and openness; and working towards sustainable development of the region and state. The CSOs have also played an important role in delivering humanitarian assistance, while they fill the void created by the collapse of government.

The civil society in Somalia can be characterized as a mix of different elements and structures, comprising local NGOs and CSOs, other informal social and community groups, professional associations (e.g. teachers, medical doctors and journalists), businesspeople, traditional clan elders and most Islamic movements in the country. CSOs are an essential feature in the country; they bring the experiences and voices of men and women, girls, boys and other marginalized groups to policy and priority - setting processes. In Puntland, the CSOs work in peaceful and conflict situations, in grassroots work in communities and political advocacy, and in the fields of humanitarian emergencies to long term development. The CSOs have the advantage of mobilizing to reach excluded communities at grassroots level, which is vital for the achievement of social and economic development goals. However, as effective as civil society organizations have been to the stability and progress of Puntland, their role has been changing and, at times, its sustainability has been tested. The government commitment to CSOs is minimal, which leads to a lack of enabling policies, laws and regulations.

The major objective of this study was to understand the current environment for civil society's operations and to recommend actions for effective and coordinated work of CSOs in Puntland. Twen

ty three organizations in Galkacyo and Garowe cities participated in this study through in - depth interviews on issues of structure, functionality, goals and objectives to examine their challenges and strengths. The research sought to understand civil society's creative power and collective action, while they attempt to stay sustainable and relevant to the needs of the citizens, who depend on their local CSO to solve their social problems.

The study concluded that, civil society in Somalia has been growing in the past decades. The return to normalcy and relative peace in Somalia has seen the rise of CSOs. They supplement government's efforts in nation building and service delivery. Over the past years, the civil society operating environment in Somalia has taken different shapes which have been informed by changes in Somalia's social economic and political circumstances. The environment in which these organizations work in however is not without constraints.

Civic space constraints continue to be a critical barrier to civil society. Among the enabling factors in the operation environment of CSOs in Garowe and Galkacyo that the study found were among others; freedom of association, freedom of expression, right to operate free from government interference, right to conduct development work without fear of reprisals, favorable stable operating environment and collaborations through umbrellas. Whereas, security challenges, governance challenges of CSOs, human rights defenders and access to justice, poor networking and information sharing, poor awareness and media, funding challenges and the need for capacity building, skills and training were among the disabling factors in the operation environment for CSOs in Garowe and Galkacyo.

From the conclusions of the study, it was recommended that Civil Society Organizations need to; establish effective boards of directors that provide greater oversight, leadership and funding opportunities and that have a clear understanding of roles and responsibilities of staff and the board,

Improve the productivity of the CSOs work with strong strategies and measures to evaluate the relevancy, credibility and sustainability of their programs with transparency and accountability, Reinforce internal controls around corruption and establish active accountability, not only following donor requirements, build local capacities through the promotion of ongoing learning and adaptation within the organizations and integrate capacity building activities at different levels of the organization to address complex problems that exist both within and outside of the organization.

The study further recommends that the Government should take an active role in creating a conducive and enabling environment for the civil society organizations and enforce acts that support CSOs to make an impact for the people they serve, apply greater oversight on legislation, its proper implementation and adherence in accordance with Puntland State Government laws binding the International Non-governmental Organizations (INGOs) to not compete with local organizations on funds that are less than $250,000

as stipulated by the Puntland NGO Act and also play a role in fostering an enabling environment for the effective functioning of the media by reducing restrictions and access to information for journalists and CSOs alike.

It is further recommended that the International Community should not make CSOs their agents for delivering projects or simple implementing contractors, but equal partners who can respond effectively to the needs of the society, International community should establish access to funding for CSOs for strengthening their capacities in reaching a sustainable organizational structure that is not donor's dependent. Additionally, CSOs should explore and use local revenue sources to sustain their work after the external funding resources cease. International donors should support capacity building and knowledge maintaining initiatives to develop skills and abilities and to ensure that CSOs build strong partnerships with government agencies and other CSOs based on complementary technical niches.

BACKGROUND

Due to the constant challenges that have hampered governance triggered the growth of the civil society in Somalia. The civil society of Somalia includes local NGOs, policy support organizations, think tanks and research bodies and community - based organizations among others. Coupled with an unstable operating environment for the CSOs, they financial backing remains a big challenge for their operations in Somalia. A considerable amount of financial support is tied to mainly humanitarian and development at local level in the area of social sector development especially in the health and education subsectors. Civil society organizations are instrumental in the peace building and reconciliation of Somalia thus playing a role in national building. If CSOs activities are financially supported by international partners, they can help the federal and member state governments reach the much - needed services to the citizens in areas of civic education, outreach, women empowerment, and service delivery at the grassroots levels.

1.1 Political and Economic Development

Somalia is recovering from a prolonged civil war since the collapse of the Siyad Barre regime in 1991. Since then, external efforts have been made to create a formal central state. There has been a widespread insecurity in the country over the years. Most of the armed clashes since 1991 have been fought in the name of a clan. The outcome has been various de jure governments with no de facto power causing less stability and an increase in externally displaced people .

In 2012, following more than two decades of conflict, a new federal government emerged in Mogadishu within the framework established by the Provisional Constitution. The international community agreed to the Somali Compact with the Federal Government of Somalia (FGS), providing an organizing framework (2014 - 16) for the delivery of assistance to Somalia in line with national priorities and increasingly through Somali institutions.

In 2017, a New Partnership for Somalia was established following a peaceful transition of power in February the same year - aligned to the National Development Plan with key priority areas for critical development: humanitarian support, strengthening national security, more inclusive stable politics and accelerating economic recovery .

After two decades of civil war, Somalia's trajectory, though uncertain, is positive. The 2012 UN Human Development Index of Somalia stood at 0.285 and the country ranked 165 out of 170 countries. Emerging federal structures are transforming the national political map through a process of state formation. However, the capacity of Somalia's regions is asymmetric, and the nature of conflict and violence continues to evolve with the heightening economic stakes. In terms of economic growth, the Gross Domestic Product (GDP) in Somalia expanded 2.40 % in 2017 -from the previous year. GDP Annual Growth Rate in Somalia averaged 1.58 % from 1961 until 2017, reaching an all - time high of 14.88 % in 1972 and a record low of -21 % in 1994 .

Poverty in Somalia is still high, particularly in the settlements of internally displaced people (IDP). Poverty linked to pervasive food insecurity is a recurring humanitarian issue; more than half of Somalis were already living in poverty before the most recent droughts and associated consumption shock. Poverty varies considerably among Somalis; regional differences in poverty between Mogadishu (60 percent) and urban Somaliland (49 percent) and urban/rural variations (63 percent in rural Somaliland) contribute to inequality.

Decades of strife have uprooted substantial parts of the society, created new grievances, and distorted local economic and political relations and institutions. Migration has created remittance flows that, outweighing international aid flows and foreign direct investment, provide a lifeline to large

segments of the population. Recurrent extreme weather conditions have exacerbated Somalia's degraded environment and regulatory incapacity.

The security sector in Somalia presently comprises an overlapping patchwork of militias, armed groups and regional forcesof vastly different capabilities and levels of effectiveness and opposed to/by Al - Shabaab (AS) to varying degrees. Clan - based conflicts remain the most common form of violent contestation in Somalia, based on primordial identities, revolve around scarce resource allocation and access, and remain a key source for mistrust across the population. Al - Shabaab (AS), the terrorist group plaguing Somalia for more than a decade now, capitalizes on these local conflicts and injects new energy in its waning campaign against the emerging formal institutions in Somalia.

On average, school enrollment is 4 percentage points higher for boys than girls, though the gaps are smaller in Mogadishu and Puntland. Such low access to education for girls is likely to have numerous negative impacts, among them higher population growth, poorer future opportunities for employment, lower wages, heightened vulnerability, and poor health outcomes for women and their children. Gender - based violence (GBV) is pervasive and exacerbated by conflict and displacement, with a complete absence ofpublic safety provision and enforcement of protection laws; displaced women are particularly at risk of violence.

1.2 Civil Society Development in Somalia

Somalia, like most African countries, had an extensive and active level of socio - political engagement prior to colonialism. This was based on a system of traditional indigenous structures, facilitated by clans and elders, which addressedclan reconciliations, criminal and civil disputes, and resource sharing. Colonial powers discouraged civil society organizations because of their potentially disruptive effect, even though there was an increase in various clubs for sports, students, women, and others during this period.

In post - colonial Somalia, the dictatorial regime of General Siyad Barre who ruled for 21 years until 1991, banned all civil society organizations not directly linked to the state, creating, instead, government - owned organizations, such as teachers' associations, trade unions, a national women's organization and trade cooperatives. The rise of non - governmental forms of associations – NGOs, informal professional networks, political parties and interest groups which organize around issues such as children, women or the disabled – was an outcome of the civil war. Even after the regime's collapse in the late 1980s, the organizations Barre's regime established never developed into autonomous organizations at either the central or peripheral level.

Following the civil war during the early 1990s, the Somali state and its institutions, including ministries, local governments, schools, and health centerscollapsed and their offices were practically dismantled. With no state to provide services, it was often village - level self - help groups - many of them Islamic faith - based entities,supported or managed by traditional elders - that stepped in to fill the vacuum of the collapsed state. This major upsurge of interest in the civil society was aimed to fillthe void created by the absence of the central governmentwith the clear objective of ensuring the coverage of basic needs such as health, education, clean water and other public services.

in times of need and crisis. Thus, most of these groups functioned as social welfare providers and as extensions of the local, dominant clan and its interests. Even today, these groups often distribute food to inaccessible communities, tend to orphans and provide rudimentary education and health care. These organizations regularly switch their areas of focus to follow the donor money trail; they become specialized service - providers: from emergency relief, through rehabilitation and reconstruction, to development and human rights protection advocates, as well as peacemakers.

The first NGOs were founded in the early 1980s to respond to the Ogaden refugee crisis. By late 1980s there were only some 15 local NGOs in the whole country, in 1995 over 320 NGOs were registered.

Established organizations became financially profitable as international aid agencies needed local partners to run their projects. Several CSOs emerged as implementing partner organizations of donor aid (NGO) and/or as community - based organizations (CBOs) – a direct intervention of international NGOs at the grassroots level. The NGOs were initially funded for facilitating the delivery of aid (often food aid) and the implementation of development activities at the local level. The dependence on international funding meant most of these Somali organizations were ultimately unsustainable and were plagued by weak local legitimacy due to their connections with Western driven agencies .

Case 1: When learning becomes dangerous

The Asha Gelle Foundation (TAGF) was established in 2013, in Galkacyo, Puntland, Somaliaby Asha Gelle, the former Minister ofWomen Development and Family Affairs, of Puntland State of Somalia.

TAG Foundation focuses on Women, youth and marginalized community empowerment to achieve greater socio - economic development and political inclusivity for these important segments of society.TAG Foundation champions to advocate for women political participation, combatting gender discrimination, Social Norms and Participation (SNAP) economic empowerment through Village Saving and Loans Associations (VSLA), and discouraging youth in illegal migration and Gender Based Violence (GBV).

TAG Foundation provides opportunities, through VSLA, microfinance to women and marginalized groups who are often excluded from financial services. TAG Foundation's work is making a difference and having an impact throughout the regions that it serves. One particular achievement of TAG Foundation with the support of the Community is featured in the story below.

In a small town outside north of Galkacyo city, in Puntland, called Bacaadweyn, girls from a nearby village called Mergaaga, were tasked to a long a walk to reach and attend a school in Bacaadweyn. The girls were determined to walk and reach the school, although they knew the danger ahead.

Every morning the young ladies faced harassment from strangers, of men and boys, along their journey to Bacaadweyn School, but they showed courage in numbers. They walked together and supported each other. They faced the danger of rape every morning, but they had no other choice except to continue the long journey to school. Their education was important to them.

Once they reached the school, the teachers kicked them out of class for being late. So, the girls continued facing these obstacles, and although some got discouraged, the majority continued coming to school under this circumstance. Through the village elders and parents, who were worried for the girls due to the rise of rape in the area, TAG Foundation in Galkacyo, was alerted about the problem.

TAG Foundation went to the village residents and had a consultation meeting with them. Together the village residents, elders, parents, girls and TAG Foundation came up with a solution to provide daily transportation for the girls. TAG Foundation organized a fundraising for the girls and with the business community; they bought a bus to transport the girls from the village to school.

This community led effort solved the ongoing safety issue for the village girls. The girls are continuing their education and the bus the community bought for them is helping them come to school so they can learn and complete their education.

During the 20 - year - conflict in Somalia, NGOs in general, both local and international ones, have been strongly criticized for having used the war for their own benefits: instability and insecurity have created jobs, income and corruption. For security reasons international NGOs have moved their head offices from Mogadishu mostly to Nairobi, where a significant amount of the money, aimed at the Somalia operations, has ended up to international NGO elite and NGO machinery.

Despite many challenges, there are several competent and committed CSOs in place in Somalia, which have also managed to secure funding from local sources or from the diaspora. The diaspora -Somalis who have lived several years in Europe, North America or Australia - is believed to have changed their cultural and religious values or adopted new ideas. They are seen to behave or dress differently from the local people and, moreover, they may be ridiculed for not mastering the Somali language completely.

The challenges facing the CSOs are many, chief among them are funding sources and sustainability of programs/projects. CSOs are donor dependent and once the donor funding ends, the CSOs cannot sustain their activities independently without international support.

Case 2: A Different Approach

Tadamun Social Society (TASS) is a non -governmental organization (NGO), founded in Bosaso, Puntland, Somalia in 1992, by Somali intellectuals who saw the need for such an organization to contribute the socio - economic development of the people in the region. Head quartered in the port city of Basaso, TASS developed into one of the largest humanitarians and development organizations in Puntland –Somalia. Tadamun, has also presence throughout Puntland, and has sub offices in Garowe, Qardo, and Galkacyo.

Tadamun Social Society (TASS) focuses on the core needs of society. Their main focus includes humanitarian and development sectors such as education, health, Nutrition, construction of water wells and boreholes, WASH, emergency preparedness, youth, women empowerment programs and supporting orphans to pay school fees.

Tadamun's approach has been successful in that they have been working in Puntland for twenty seven years. Their longevity is partly due to the fact they are heavily involved in making change through humanitarian and development projects.
Tadamun's funding source is diverse; they receive funding from the private sector, mostly big business and the Somali Diaspora, they also compete for donor funding. They have two fundraising initiatives to support their core humanitarian and development projects. One is mainly to engage the business community and the other is to involve Somalis in the Diaspora.

This model has been working for Tadamun due to the fact, funders can see the success of their projects and this encourages them to get involved. They also have on going donor supported projects that have been successful. They are a trusted CSO with proven evidence of projects that had been strengthening the community. This approach has addressed some of the daunting challenge of donor dependency faced by most CSOs.

Civil society organizations continue to depend on external support. Their activities and funding sources are largely project - based and ad hoc, hindering their ability to secure independent funding. Due to limited funding sources and fierce internal politics and competition, staff turnover is high for many CSOs. Many are seen as promoting Western models of state - society relationships or as rubber stamps for the government, depending on their clan and power dynamics.

CSOs and government institutions have little interaction when it comes to strengthening the functionality of CSOs and their ability to grow and flourish. Nevertheless, CSOs and government agencies have close working collaboration under program's implementation or when promoting urgent social issues. But outside of that, CSOs are not involved in policy making and are at times unaware of policy processes.

Nowadays, in Somalia, the term 'civil society' encompassesa multiplicity and diversity of actors from NGOs and CBOs to professional associations and institutions. The term describes an ever - growing group that includes the private sector, media, teachers, lawyers, medical practitioners, journalists and traditional elders.While many Somalis believe that civil society serves the interests of all citizens and acts as a counterweight to the government, others find the concept to be driven by donors and western interests. CSOs are often associated too closely with political leaders or clan elders.Somali CSOs are often seen as either supporting the state administration or the opposition party or clan, depending on who is leading the organisation at the time. However, CSOs continue to demonstrate their value as facilitators, advocates, election observers and innovators. Many are striving to become financially and politically independent institutions, acting as watchdogs, ethical guardians and advocates for the marginalised and under - represented.

Among the factors affecting the conducive environment of CSOs in Somalia, is access to finance through funding, unstable political and security environment, capacity issues with staffing and weak collaboration among the CSOs. These factors have limited the full potential of the Somali civil society, resulting in a missed opportunity to fully have them participate and speed up the development process of Somalia and communities. The disenabling factors in the operating environment of CSOs in Somalia necessitated the

creation of Non - State Actors associations to collectively address some of the challenges affecting the effective operation of CSOs in Somalia. The most notable three of these associations are based in Puntland, Somaliland and Mogadisho,these are:

1. The Puntland Non - State Actors Association (PUNSAA) assembles non - state actors (NSAs) in Puntland into one platform/network. Established on 14 May 2008 with assistance from the European Union, it gives local NSAs a platform to participate in and influence policy and decision - making processes at local, state, regional and international levels.

2. Somalia Non - State Actors (SONSA) previously known as Somalia South Central Non - State Actors (SOSCENSA) is an umbrella for NGOs, CBOs, professional organizations (teachers, doctors, lawyers etc), universities and private education associations among others from across Somalia. It aims to support Somalia stay on the path to economic, social and political stability through good governance through the participation of those affected; civil society, government and businesses.

3. Somaliland Non - State Actors Forum (SONSAF) founded in 2005 by business groups, traditional leaders, professional associations, religious leaders and civil society organizations in Somaliland aims to enhance the development process of Somaliland through better coordination and networking amongst non - state actors of Somaliland. It aims at strengthening the voice of non - state actors and to enable them to engage in domestic and international policy dialogue activities.

1.2.1 CSOs in Puntland and Galmudug

CSOs in Puntland and Galmudug, CSOs play a crucial social and economic role by responding to the humanitarian and development needs of the people from all sectors. Civil society organizations in Puntland have also been instrumental in spearheading the need of good governance, and the fight against human rights violations and for freedom of press. There is, however, lack of coordination, cooperation, and partnership between the CSOs themselves and between the CSOs and Puntland government institutions.

CSOsin Puntland and Galmudug must find solutions for situations on the ground around many issues including severe poverty and broken social safety net, healthcare, school fees, livelihood, lawlessness, and security.They are constantly being challenged by government's lack of capacity and are seen as the saviors of community problems. In opposition to this, CSOs are often stigmatized for working on issues that are perceived contrary to Somali culture; communities frequently consider the rumors surrounding CSOs asbringing western ideology and culture,or as spies for foreign entities. In this context, CSO's workers workin constant fear of harassment and harm and in unsafe conditions especially in Galkacyo.

The organizations themselves are survivors and have been operating in war and post war environment for years. The fact they operate with such shoestring budget is itself commendable and resilient. There is no manual on how to function as a CSO in Puntland and Galmudug, but the CSOs interviewed from Garowe and Galkacyo have created their own organic systems out of sheer necessity to maneuver between the international aid that is project specific, and a beneficiary community whose needs might not strictly be in accordance with the donor's priorities.One female CSO worker expressed:

"Recently there was a woman whose daughter was raped, but she was terrified to even admit to the rape, it's easier to hide their shame and face all at once, mothers of rape victims have been forced to silence to keep their families safe, I can't talk to them about human rights when I can't secure her human rights, it becomes empty words."

Another CSO staff stressed how the severity of poverty inserts itself in their daily projectswhen a woman in a training session refused to eat the lunch provided. The woman was just staring down at the food and shaking her head; she was on the verge of tears. And when the CSO worker took her aside and asked her what was going on, the woman said "My children are sitting in my small shack, all huddled up, hungry and waiting for me to bring them something to eat, how can I eat all this food when my children are starving at home?" CSOs visited in Garowe and Galkacyo expressed that occasionally they adjust their plans to attend severe cases of starvation and illness. For example, they may hand the daily stipend just before lunch, so participants who have children at home can buy groceries for their children. These are scenarios that play out in CSOs daily work and show the contradiction between international funding goals and the reality on the ground.

Civil society organizations have beenkey actors in the country since the onset of the civil war in Somalia, some have been on the ground for over 20 years while others have been around between five to ten years (see Table 1: CSO Profile). In fact, some CSOs have delivered services when the government of Puntland was not formed yet. Most founders of CSOs were women between the ages of 35 – 63, passionate, deeply caring about community issues and committed to social change.

Some founders of CSOs were originally from Puntland but have never been there as they were themselves displaced from Mogadishu. For example, The Asha Geele Foundation (TAG) was founded by former Minister Asha Geele who was forced by the war to come back to Puntland and has been involved in social issues ever since. Tadamun is another organization that has been part of the community throughout the past twenty years working with IDPs in all nine regions of Puntland.

The civil society organizations in Puntland and Galmudug are founded on the basis of accessing to resources that could help their communities, with particular concern for the excluded groups. Most of the older generation organizations focused on human rights, peace building, IDP and humanitarian services, skills training and capacity building, education, health, and WASH

Case 3: Innovative Income Support

Somali Agro Action Community (SAACOM) was founded on 2003 by Asha Abdi Hussein in Garowe, Puntland, Somalia. The founder stressed the reason the organization came to form, that was due to the need of the marginalized communities that had necessitated a place where these communities could learn farming so they could farm and sell their produce. In later years, Somali Agro Action Community (SAACOM) had expanded its focus to include training and skills building for the marginalized community. Its focus is to train, build skills and give opportunity to work or its graduates to establish their own businesses.

SAACOM has experimented with a vocational training scheme where students attend daily classes for over a year. The first class teaches writing and reading in the Somali language. For most students this is the first time they are sitting in a formal learning environment.

Skills building classes include Henna Design, basket weaving from recycled material, electrician,

and cooking. The average class is between six months and one year. With the help of INGOs the students are given small stipends, and necessary equipment or material to start their own business upon graduation.

For example, women who learn how to cook are supplied with pots and pans and cooking instruments to open a small - scale restaurant.

Henna design graduates are hired as Henna designers in beauty shops and electricians are hired by the real state sector to install electricity in new homes.

SAACOM is solving community challenges with an innovative idea that has become a funding stream to continue their programs. SAAC attracts many students due to the stable income earned for their graduates. There is also a social enterprise aspect where students sell the products, they make on school premises and they split the profit with the Somali Agro Action Community (SAACOM).

Civil society engagement in the development of Puntland cannot be understated. To support one another, the CSOs operate under an umbrella called Puntland Non - State Actors Association (PUNSSA) where they are all stakeholders in state development. PUNSAA is actively engages international actors in an endeavor to influence decisions on politics and socio - economic issues in Puntland. PUNSAA also promotes better engagement with international institutions and donors to ensure international aid modalities are aligned with NSA priorities. PUNSAA links NSAs to government programmes to support in grassroots service delivery. Over the years, civil society organizations through PUNSAA have focused on marginalized groups (e.g. women), youth development, good governance, innovation, democratization, and the media.

1.3 Policies and Legal Frameworks for CSOs Operations in Somalia

Although the enabling environment for civil society organizations in Somalia is informed by the completeness of the economic, political and social life of a country, laws and regulations also go a long way in ensuring that CSOs operate more flexibly. Overall, the legal and policy structure in Somalia broadly supports the operation of CSOs.

The Provisional Federal Constitution, of the Somalia Federal Government guarantees the freedom of association in article 16 which states that, "every person has the right to associate with other individuals and groups. This includes the right to form and belong to organizations, including trade unions and political parties. It also includes the right not to associate with others, and a person cannot be forced to associate with any other individual or group." Articles 18 and 22 also reinforce that every person has the right to organize and participate in meetings, and to demonstrate and protest peacefully, without requiring prior authorization. The press and independent media are also guaranteed the right to freely express opinion. This policy and legal framework for CSO operations in Somalia has played a key role in the proliferation of CSOs in the country. The registration processes and requirements are more favorable than in most countries.

A key informant from Garowe argued that whereas there remain some questions on the extent of the freedom enjoyed by individuals and CSOs to freely express themselves. He added that the consensus among many CSOs directors and executives is that overall the policy and legal framework has favored a better working environment for them; however, there are limits to this freedom because they are not allowed to criticize the government and its officials without fear of reprimand. This means that the freedom enjoyed by CSOs to operate in Garowe and Galkacyo has limits.

1.3.1 Policies and Legal Frameworks for CSO Operations in Puntland

The peaceful transfer of power in Puntland and the subsequent peace enjoyed within the state ensures that CSOs operate favorably than in most states within Somalia especially in terms of security and scope.Article 14 of the Puntland Constitution gives persons the right to form or join organizations pursuing socio - economic, sport, cultural, or scientific objectives. This means that the legal and institutional framework in Puntland allows for the formation of an association as long as it is consistent with State law and is in good faith and in the people Puntland's interest. Furthermore, the NGO Act that regulates both international and national NGOs and ensures that NGO activities are in line with the government development priorities and improve accountability and transparency.

The Non - Governmental Organization (NGO) sector in Puntland is guided by the NGO Act (2016), a policy instrument that was established to create a more enabling environment for CSOs to function and thrive. The Act states that all CSOs should be registered and seeks to ensure that CSOs function in a good governing environment.

After posting a registration fees at the Ministry of Finance and getting the registration license from the NGO Desk at the Ministry of Planning, an organization is free to operate. The Ministry is very strict on CSOs who go out of their mandate or who do not periodically declare their activities in Puntland. This is the reasonmany CSOs close business only after a few months in operation and the active ones being few. For example, majority of respondents (76%) in Galkacyo complained that they have to travel to Garowe to register, certify or renew licenses for their CSOs. They also added that the $200 fees levied on first time registration and $100 on renew discourages some CSOs

which already have issues with securing funding for their projects. In contrast however, 72% of the respondents from Garowe said they did not meet any significant challenges in accessing the NGO Desk, but 28% said that the registration fees were also a challenge the registration process takes some time.

Box 1: NGO Act (2016)
This legislation aims to:

- Create a central mechanism that regulates the registration and the development of activities of local and international NGOs so that their activities are aligned with the country's national development plan.
- Promote the freedom of citizens to establish NGOs.
- Make NGOs legally constituted organizations with legal personality.

The Act as a law is binding, however, it cannot enforce its implementation due to the challenges the government institutions face regarding conflicting or more pressing priorities, such as security and daily survival. According to the study interviews, only 10% of laws are enforced and 90% of them are not.

Line ministries lack strong institutional mechanisms to enable the implementation of a legal framework that supports a thriving civil society environment, which, in turn, impacts on CSOs internal systems and hampers to promote internal accountability. For example, Section 36 of the Act deals with Account Ledgers and Account Registers and spells out the requirement for CSOs to have a fully functioning accounting system with the ability to record assets, liabilities, revenues, and expenditure in accordance with international accounting standards. While is on the law, it does not mean that an organization would truly comply with it.

Another example where law and practice do not meet is the requirement of annual audits for all CSOs. CSOs have independently audited accounts performed by auditing firms based abroad, particularly in Kenya. The auditing of financial statements is a prerequisite that usually international donors request for the disbursement of funds.The government institutions that need to enforce the accounting standards set by the NGO Act are absent.

2. METHODOLOGY

2.1 Scope of the Study

The purpose of the study is to gain a greater understanding of the strengths, weakness, challenges, and successes of the civil society organizations in Puntland through the eyes of their staff, and to analyze the environment under which they operate.

The study offersan insight around the policies and practices that govern CSOs and their impact on civil society's development. It contributes to explore ways in which CSOs could be more effective and have a greater role in development projects for the citizens of Puntland.

This study focused on the current environment for civil societies' operations and recommend actions for effective and coordinated work of civil societies in Garowe and Galkacyo. The research design employed for this study was descriptive in nature where the respondents were asked to describe the functioning of CSO in Garowe and Galkacyo and the environment in which they operate.

2.2 Sampling Method

Purposive sampling was used to select the key informants who had firsthand and relevant information about the study variables.23 CSOs leaders were interviewed from Galkacyo and Garowe cities. The study employed the use of key informant interviews, focus group discussions (FGDs) and documentary (literature) review as the main data collection methods. These data collection methods enabled data collectors draw in - depth facts and opinions about the functioning of CSOs in Garowe and Galkacyo as well as their operating environment. Furthermore, the FGDs helped in the validation of collected data.

2.3 Data Collection and Management

During data collection, field researchers observed that between Garowe and Galkacyo, many CSOs were based in the later than the former. The sample included; 9 CSOs in Garowe and 14 CSOs

in Galkayo. This is because it was hypothesised that the operation environment of CSOs in

- Policy and legal framework governing CSOs operations
- Human rights defense and access to justice
- Good governance of organizations
- Awareness and access to media
- Sharing information and networking
- Funding challenges

The research was conducted by SIDRA.The interviewers had demonstrated experience in administering community - based surveys, fluency in the Somali language and relevant knowledge of the two towns of Galkacyo and Garowe.Enumerators were trained on the study protocol and data collection instruments and helped to pre - test the instruments .

SIDRA led the data collection activities in each city and the lead researcher provided overall supervision, guidance and accompanied the numerators, during and after data collection. Numerators strictly followed data collection protocols to ensure the questionnaires were filled correctly and to request the signature on the consent forms. The co - researcher supervised the community engagement process and contacted all stakeholders involved in the study. Each interview with its interview guide took approximately 45 minutes to 1 hour to administer. Questions were asked in the Somali language and administered inthe participant's office.

At the completion of each day of interviewing, the supervising team leader reviewed the completed questionnaires and discussed questions and concerns about the day's interviews. Any concerns from the day were addressed using field notes. If necessary, numerators discussed concerns in a pre - interview meeting the following morning to clarify any issues. To assure data quality, the team leader performed random checks on the survey sample to confirm accuracy and integrity of the data collected.

The study was complemented with a review of literature pertaining the civil society history and development, as well as research on the topic in Somalia.

Table 1: CSO Profile

Year of foundation	Number of years functioning	No of CSOs	Focus Area
2018 - 2013	1 - 5	7	Technology, health, education, livelihood, peace building, advocacy, women in politics, inclusion
2012 - 2008	6 - 10	4	Democratization and good governance, media, human rights, empowering minority groups and youth, peace and development
2007 - 2003	11 - 15	5	Education, IDPs, peace building, marginalized groups - women, youth and IDPS, governance
Before 2003	More than15	7	Human rights, peace building, IDP, humanitarian services, skills training, education, health, WASH, and capacity building

2.4. Limitations of the Study

First, there were security concerns in Galkacyo city as there have been explosions threats and targeted killing. The study was, therefore, confined to the north side of the city, which is governed by the Puntland government. Only two CSOs in the south of the city were interviewed.

Secondly, there are data availability limitations regarding the lack of reliable previous studies.

Third, it would have been optimal to have access to a larger sample of staff in the organizations studied, but due to other work commitments they were not available.

Additionally, the study timeframe was limited, and it did not allow including a larger selection of CSOs.Finally, access to CSO's own documents,such as bylaws, organization structure, program or project reportsand other data,was restricted but it did not substantially hamper the main results of the study.

3. THE OPERATING ENVIRONMENT OF CSOs IN PUNTLAND

3. Scope of the Study

Civil society in Somalia has been growing in the past decades. The return to normalcy and relative peace in Somalia has seen the rise of CSOs. They supplement government's efforts in nation building and service delivery. Over the past years, the civil society operating environment in Somalia has taken different shapes which have been informed by changes in Somalia's social economic and political circumstances.The environment in which these organizations work in however is not without constraints. Civic space constraints continue to be a critical barrier to civil society. In conducting the key informant interviews and focus group discussions in Garowe and Galkayo, the CSOs executives mentioned both enabling and disenabling factors to the operation environment of the civil society in Somalia and their views were captured in the sections below.

3.1 Enabling Environment for CSOs in Garowe and Galkacyo

A supportive and enabling environment for CSOs is crucially linked to fundamental human rights: freedom of association and to assemble, freedom of individuals or groups to express their opinions, and freedom to work without fears and threats for the benefit of the communities they serve:

3.1.1Freedom of Association

In Puntland, all individuals can freely establish, join and participate in informal and/or formal organizations. The legal framework establishes that any person can form associations, foundations and other types of non - profit and civil society organizations for any purpose and without any restriction.Registration with the Ministry of Planning and local government, city and other municipalities is

not mandatory for groups that have a common interest but gather under an informal structure such as neighborhood groups, elder groups among others but if it is a formal organization such as a CSO it is required to register with the government.

When organizations decide to register,the rules are clearly prescribed allowing for easy registration and for an appeal process in the case of denial – for example, when a CSO does not provide the required documentation necessary to finalize the registration process. Individuals and CSOs can form and participate in networks and coalitions within any other organizations, businesses, donors and volunteers with ease. Data from interviews showed that majority of respondents from Garowe 78% said that it was easy for CSOs to associate in different areas of Puntland without any restriction whereas only 59% of the respondents from Galkacyo agreed with that assertion.

3.1.2 Freedom of Expression

In Puntland, CSOs and individuals can exercise their right to free expression and to engage in advocacy for democratic rights. Citizens have the right to receive information from any source including from Internet. On 6 December 2016, the Puntland Parliament amended the Puntland Media Law, stating theobjective was to strengthen the protection of freedom of the media.The amendment guaranteed freedom of expression to the media, ensuring the promotion of an independent media. However according to 60% of the respondents from Garowe, CSOs are only free to express their opinions on paper but in reality, they cannot express their opinions on sensitive matters like governance, corruption, civil servants pay and human rights. This observation was supported by 54% of the respondents from Galkacyo.

3.1.3 Right to Operate Free from Government Interference

The NGO Act of 2016 guarantees that CSOs have the right to regulate their internal structure, management systems and operating procedures. CSOs are free to appoint their own board members, with no restrictions regarding membership, roles and responsibilities. The law requires that CSOs receive advance approval from the state for carrying out their activities through registration. Once the organization is registered and administrative fees are paid, the CSO is free to decide its structures, policies, systems and thematic focus of interest. From the primary data, majority of the respondents from Garowe 73% agreed with the fact that indeed they are able to operate freely without government interference but they added that this is true to an extent because if CSOs touch sensitive matters or criticize government service delivery, they will be reprimanded by the government and worse scenarios their licenses revoked. On the other hand, respondents in Galkacyo 60% agreed with the view that CSOs are free to operate without government interference but they too added that this is true to only an extent.

3.1.4 Right to Conduct Development Work without Fear of Reprisals

CSOs can freely and actively seek financing from external sources for its programming, advocacy and for sustaining themselves. Local income generating sources are limited and most funding sources are international. There are no legal instruments prohibiting CSOs in Puntland from accessing donor funding or from INGOs. 87% of the respondents in Garowe agreed with this assumption whereas in Galkacyo a relatively similar percentage of respondents 73% supported the view that the government does not limit CSOs' accessing to donor funding or sub grants from INGOs. CSOs are free to partake in development

and humanitarian work. They can identify, develop, and implement programs at will. CSOs can hire staff that will implement projects without harassment, infringement or threats from the government. There is a free and enabling environment for CSOs to exercise their freedom to conduct development work without worry of retaliation.

3.1.5 Favorable Stable Operating Environment

The conducive operating environment for CSOs in Puntland has been attributed to the relatively favorable secure and political environment in the state. Some CSOs also enjoy political support provided by the regional and district leadership. This is reflected in the local leaders' active effort to engage CSOs and to involve them in several regional and district social programmes. This view was only supported by fewer respondents in Galkacyo than in Garowe. For instance, 68% of the respondents from Garowe agreed with the fact that they enjoy a favorably stable environment in terms of security and political support from politicians whereas in contrast, only 36% of the respondents from Galkacyo agreed with this statement. Majority of the respondents from Galkacyo 64% said that the operating environment in the district is affected by the instability and insecurity within the town especially in Southern Galkacyo where constant skirmishes with Galmudug impact on their activities.

3.1.6 Collaborations through Umbrellas

There are three regional Non State Actors' platforms in Somalia which bring together all the CSOs within that region under one umbrella. These are;

1. In Puntland, the umbrella is called the Puntland Non-state Actors Association (PUNSAA)
2. In Somaliland, the umbrella is called Somaliland Non-state Actors Association (SONSAF)
3. In the south and central Somalia, the umbrella is called South Central Non-state Actors Association (SOSCENSA)

The collaborations among CSOs especially through Umbrellas like the PUNSAA, other more focused umbrellas like for women, writers, media, youth among others has also facilitating the enabling environment for CSOs in Garowe and Galkacyo. The umbrellas help bring the CSOs with similar focuses together to manage similar challenges each face. Challenges arising from poor funding, low capacity staffing and focusing and their solutions are debated when these associations convene. This togetherness among CSOs sets an agenda for their operations and hence provides a better working environment for them. From the data findings, it was revealed that 64% of the respondents from Garowe said that by CSOs joining together in umbrellas has enabled them to achieve a lot together and reach more target people that way. However, in Galkacyo only 36% agreed with this assertion because several said that since the umbrellas are based in Garowe or Mogadishu, it is not very easy to engage in constant conventions and meetings but they said that collaborations truly promote a favorable operating environment for CSOs in Garowe and Galkacyo.

3.2 Disabling Environment for CSOs in Garowe and Galkacyo

Civil society organizations in Puntland have been confronted with a myriad of challengesover the years that have made it difficult for them to function effectively as agents of socio - economic development. Their impact is limited in scope, scale and sustainability with a restricted engagement in networking with government bodies and other CSOs, as well as the scarcity of funding sources outside international donors. The innovative ideas to spearhead projects and sustainable grassroots initiatives are hampered by unreliable funding.

Most of the CSOs in Puntland are concentrated in a few major cities like in Garowe and Galkacyowhere government offices are located without

spreading to rural areas and this is a serious limitation forthe civil society development. Furthermore, in rural communities CSOs are the bridge that connects people's needs with the possibility of accessing basic services and humanitarian support. The organizations are also key in advocating for marginalized groups and IDP residents and provide them with relief services outside the urban centers.

3.2.1 Security Challenges

After the collapse of Somalia's central government in 1991, all the government institutions have disintegrated, which led the country to plunge into lawlessness and protracted conflict and violence. Trust deficit between the clans and clashes over resources and power have become the main causes of conflict and violence that devastated the country.

Although Somalia has adapted and established a federal government system with five federal member states and progress has being made in the security front, safety is still a major issue for CSOs. The lack of peace and security, particularly in the southern parts of the country where extremist activities are rampant, is an immense challenge for those working in humanitarian and development projects.

Galkacyo is a major town in central Somalia and the capital city of the Mudug Region. Puntland administers the North side of the city, while the South is controlled by Galmudug. The conflict and violence in Galkacyois complex and based on clan rivalries.Thus, the security situation in Galkacyo remains fragile, despite current peace and security improvements that came about as a joint effort by both Puntland and Galmudug.

While numerators for this research where on the ground in Galkacyo city in May 2019, there were clashes between two tribes in the region over gracing land and water points. As a result, death and destruction were present during the data

collection process. Issues of safety and the exposure to imminent danger is a regular reality for CSOs workers.

CSOs are making their contribution to peace building by engaging residents of the city of Galkacyothrough initiatives such as peace for football and othersthat involve elders, religious leaders, women, and youth to build lasting peace and improve the trust between the communities of north and south of Galkacyo and Mudug region in general.

Case 4: Football for Peace

Horseed Peace and Development Organization is based in Galkacyo City, Puntland, Somalia. The organization was founded in 2004 by Halimo Koonfurow, who is very active in peace building and community cohesiveness.

Horseed Peace and Development Organization works on peace building between the residents of South Galkacyo, of Galmudug State and the North Galkacyo of Puntland State.The Organization has been working on peace building for the past 15 years. One area of focus for the Organization is to build peace and harmony between youth from both sides of the city, North and South of Galkacyo.

Galkacyo City has had ongoing conflict for years. The conflict comes from the fact that two different clans, from two states, Puntland and Galmudug share the city. Historically, Galkacyo City has had some clashes and at times an all - out conflict with multiple deaths from both sides had occurred.

Horseed stepped in to build and mediate peace between women, elders, traditional leaders and youth. Their youth program has been bringing together young men from each side of the city to play football together.

The reason for doing this activity according to the founder, is to influence peace with young men to show them their similarities and take the conversation away from clan belonging and differences, instead, they changed the narrative to respecting each other, working together, socializing and

coming up with solutions for their wider community to harmonize their differences.

This has been very successful, and the peace football was born out of the need to lessen violence on both sides of the city. This has become a very popular event In Galkacyo City that attracts residents from both sides of the city, north and south, and it has become an event were shared values take precedent to polarization and disrespect. The winner of the football game goes home with a trophy.

3.2.2 Governance Challenges of CSOs

All the CSOs consulted in the study have evidence of formal registration with the government, with registration status either current or renewed. The study has selected three areas of good governance within each CSO to portrait internal efficiency and effectiveness, and to assess the strength in good governance:I) the governing board of directors, II) their policies and standard procedures and III)curbing corruption.

(I)   Governing Board

The boards of directors have roles and responsibilities around the oversight of operations in a given organization, mainly by reviewing and approving policies and procedures, annual reports, work - plans, and proposals before they are submitted to donors. Most of the governing boards in the CSOs of Puntland are inactive, and their contribution is mostly poor or non - existent.The frequency of board meetings varies from once a month to once a year, although in the majority of CSOs their board formation does not comply with internationalstandards. It is not easy to gather evidence regarding the compliance of the boards to the guidelines provided by the Puntland NGO Act, but the existence of board members is evident in most of the organizations in the study.

According to field data, 20% of the CSOs presentevidence of having a board that met regularly - although frequency of meetings could not be verified - and engaged at a minimum with the organization. A further group of 49% of the CSOs

presents evidence of infrequent board meetings (i.e. no minutes of meetingsare available for verification). Finally, 31% of CSOs interviewed has no structured boards that could support the goals and objectives of the organization.

Most of the organizations have challenges with the irregularity of board election and documentation. Overall, board members are not capable of formulating a strategic vision, connecting the organization to networks, setting up relationships, locating funding sources and ensuring a sustainable future. The study has not encountered a board member in person to triangulate this data.

(II)   Policies and procedures

Civil society organizations in the study present policies and procedures systems thatare unclear on the principles, rules, and guidelines adopted by the organization to reach its long - term goals. Clear guidelines are not widely accessible to management and staff. Policies and procedures should be designed to determine all major decisions and activities within the boundaries of the organization. There are no specific tools and procedures employed to manage the day - to - day operations of the CSOs.

From the study findings, 35% of the organizations interviewed have strong policy and procedures for funding, finances, human resources, corruption and programs in place. A second group of 45% CSOs has weak policies and procedures guidelines. That is, they have a manual that spells out policies and procedures but, adhering to and following them daily are not present in the understanding of the organizations. The remaining 20% of the organizations has no policies and procedures in place or has not reviewed their policies and procedures for many years.

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policies and procedures but, adhering to and following them daily are not present in the understanding of the organizations. The remaining 20% of the organizations has no policies and procedures in place or has not reviewed their policies and procedures for many years.Strategic planning is another area where inadequacy and deficiencyare observed in the organizations. About 60% of the CSOs in the study have no clear program's objectives, and work plans are not comprehensive; while 40% has strategic plans and work plans with long and short term goals in place.Regarding financial management and reporting system,30% of the CSOs show strongquality, while 35% has acceptable financial reports, and 35% has weak finance departments and reporting systems.

(III)   Curbing corruption

Corruption is often seen as a problem that is rampant in government and the public sector, but private and civil organizations also are not immune from corruption. Although the government of Puntland lacks an independent anti - corruption commission, there are, however, legal frameworks capable of rooting out corruption, if enforced.The Penal Code of 1964 is concerned with mainly the penalization of misappropriation and embezzlement of public funds at the federal level. There are no, however, specific laws to curtail corruption in Puntland.
Based on the interviews as well as observations by the study team, there have been accusations of corruptionin the civil society sector – for example, nepotism and mismanagement of funds,lack of transparency in the utilization of donor - funds. This tends to weaken the CSOs' engagement with donors and government agencies, hinderingthe integrity and value of the civil society. The impact of an organization's advocacy weakens if corruption is suspected.

3.2.3 Human rights defenders and access to justice

Civil society plays an important role in creating awareness of fundamental rights, monitoring violations of human rights, and providing services to vulnerable communities. CSOs in this study are promoters of peace and security, change makers of sustainable development, and advocates of human rights for all.

CSOs in Puntland work under the conditions of a post war era, where a free and independent civil society, including relevant international human rights standards for freedoms of expression, association and peaceful assembly, and the right to participate in public affairs has been limited, but progressively improving. Only10% of organizations -often those with high reputation and well connected -interviewed for the study has access to human rights defenders and can access the justice system. The rest has no means of defending the rights of their beneficiaries through the judicial system.

Although there is no interference from the government into civil society's role in the defense of human rights and access to the judicial system on behalf of the community they serve, the current legal and policy framework doesnot provide enabling opportunities for those seeking justice for the infringement of their human rights.

Although Puntland government and CSOs have worked together in harmony to avail a space for civil society to fully function and advance the rights of all Puntlanders, the organizations still face harassment, intimidation and, reprisals for their activities. Human rights issues are limited to declarations and policies that are enacted to support a safe environment. However, enforcement of laws is a challenge and CSOs cannot guarantee justice will prevail for cases such as rape.

Regulatory framework (legislation and administrative rules) for ensuring the enjoyment of human rights for all exists in Puntland. However, CSOs, who participated in this study, have stated that the current judicial framework is weak and that there is a pervasive lack of trust in the justice system. Overall, public opinion thinks courts are inefficient,

unfair, slow, or out - of - touch and believes that courts do not deal with cases promptly to meet the needs of the victims.

The courts lack the training and the infrastructure necessary to handle human rights cases. They are strapped for resources to adequately serve the population, particularly in rural and remote areas. The police do not fare any better, they cannot always maintain peace and security for people to enjoy basic human rights due to a culture of low accountability, low pay, shortage of skilled personnel, corrupt practices, and old infrastructure that has not seen any transformation over the years.

A challenge that CSOs are forced to encounter continuously is the way basic human rights are impeded when traditional and customary law inserts itself in the space where the legal justice system fails. The traditional law is often seen as a more accessible solution since seeking justice involves safeguarding harmony between neighboring clans. Elders and traditional leaders choose this remedy, while discouraging a formal court system to dissuade clashes between quarrelling clans. Although justice is not served by any means under the traditional Xeer law, it is still popular and necessary as it preserves social harmony and can facilitate reconciliation and peace among disputing clans.

People usually choose to seek justice and the protection of their rights under the traditional laws.They areoften not able to bring justice to the injured due to cultural and social norms andtraditional and customary laws (Xeer). Additionally, there are costs associated to travel and time consumed in taking a case to the courts. The financial challenges(including legal representation, legal aid and bribes) to see a case through the judicial system make it inaccessible and impractical for most of the citizens.

International human rights instruments are not used in areas where traditional justice prevails. Further, traditional leaders are middle aged males who are not concerned with the protection of the rights of women and minorities. In Puntland, as was voiced by the CSOs interviewed, it is a challenge to ensure that human rights of women, who suffer systematic miscarriage of justice due to their lack of agency within society, are safeguarded.

3.2.4 Networking and Information Sharing

Networks enhance the power and influence of citizen's voice in demanding for better policies and improving governance. Civil society organizations form networks to have a greater role and impact that they otherwise will not achieve by themselves.

Civil society organizations in Puntland have not been able to form networks or have virtual or physical settings for sharing information. The lack of information hinders them to reach their potential in advocacy. According to primary data, only 15% expresses interest in information sharing and networking, another 15% acknowledges not possessingenough guidance on how to network and share information with other organizations and government bodies, while65% indicates facing a challenging environment for sharing and networking.

The CSOs lack partnerships to coordinate programs, resources and advocacy to strengthen each other andto achieve a greater impact. This absence of cooperation is explained due todeficient initiatives, inexistent knowledge about the networking worthiness, a sense of caution and funding challenges. This has led to discord around decision - making and advocacy plans amongst CSOs in Puntland.

At present, the CSOs who participated in this study are hesitant to share information on their'niche' area with other organizations for fear of the others copying their projects, dipping into their own donors or taking away their know - how. One of the reasons behind this overcautious approach to networking stems from the limited pool of funding that every organization depends on to carry and sustain their programs.

Less collaboration and information sharing leads to missing out on opportunities that could lead to stronger ties as a collective actor. For example, CSOs have not established good connections with government ministries and umbrella NGOs as a lobbying body. In recent years government agencies have viewed CSOs as competitors of power, influence, and legitimacy in the public sphere rather than as development partners. This is as a result of CSOs having had more power than some government ministries in the past. For

decades, CSOs were the go - to agencies for international donors to implement projects when the government was still in its infancy. But government ministries are slowly gaining expertise on how to implement projects without CSO's intervention.

3.2.5 Awareness and Media

Media plays a crucial role in building public confidence towards civil society organizations by providing accurate, timely and balanced information that is of interest and relevance for the communities. The media sector is important in establishing a culture of transparency and accountability in the delivery of public services, political inclusiveness and citizen's participation in the democratic process. Nevertheless, the capacity in the media sector in Puntland and in general in Somalia, is weak, where most of the reporters are inexperienced youth with limited training in professional journalism.

Based on the study interviews, 34% of the CSOshave good awareness and media access, while 21% have medium accessibility and 45% have poor accessibility to media and awareness.Although in Puntland there is availability of media outlets, their effectiveness to promote awareness, transparency and accountability of public service is lacking. The CSOs use of media is limited to coverage of events and news. There isno strong partnership between the media and the civil society that supportsawareness building and campaigns about social issues such youth migration, rape, and humanitarian disasters,whichare regular incidents in the country.

3.2.6 Funding Challenges

The vast majority of the CSOs interviewed (85%)points out the difficulty they often encounter of running out of funding to implement sustainable projects. There is a chronic dependency on donors for mere survival, which hinders innovative ideas for pursuing new funding sources.
Out of 23 organizations studied, only 2 havea system of generating their own income for their day - to - day functions. Mostly they generate their own funding through vocational training, selling

products and charging their students a nominal fee. They receive limited funding from donors, but they do not depend on it. These organizations tend not to compete with others for funding.

Most of the CSOs in the study are donor dependent, which has put under question the quality and diversity of projects andhas hampered their independence in serving the needs of the community.

While donors are vocal about the issue of sustainability, yet, limited funding is invested towards mobilizing indigenous resources in order to reduce the vulnerability and dependency factor on foreign funding. Further, CSOs' financial constraints limit their technical capacities and abilities to engage in advocacy and awareness raising.

3.2.7 Capacity Building -Skills and Training

Continuous training and developing the skills of CSO staff is necessary for responding to a quickly changing environment that requires qualified and competent staff.The civil society organizations in this study shows limited capacity, knowledge and skills around advocacy strategies and techniques. The capacity of at least 50% of the CSOs interviewed needs to be strengthenedin regard totheir institutional leadership, management and operationsas well as training and skills building on action research. Capacity building needs are not limited only around the internal functions of the organization, but it also needs to cover institutional systems, personal working relationships and networking with other groups.

4. CONCLUSION

Civil Society Organizations play a central role in the socio - economic development of Puntland, as well as they respond to humanitarian and development needs of the people. Due to the lack of strong government institutions, civil society organizations fulfill government functions such as social welfare, peace building,and conflict prevention, defense of human rights, poverty reduction and humanitarian relief.

Puntland CSOs are relatively nascent, so there is a need of capacity building,training, and technical assistance geared towards the development of local staff. Short and long - term strategies for the development of staff's capacity is a priority and it should be part of the core funding of the organization - not dependent of external funds. Stronger institutions, professional and skillful, are key in sustaining civil society's critical programs. Also, accessing capacity and skills building through networks with other organizations can improve overall functioning of all organizations as they share information and improve areas that are in need of expansion and strength.

Although CSOs and their funding partners have external and internal checks and balances in place to ensure effective project implementation and transparency use of funds, the legal framework, the rules and regulations embedded in the Government of Puntland's NGO Act - need public bodies responsible for oversight and enforcement. It is paramount that internal policies and procedures of the CSOs as well as government laws and regulations be enforced and followed.

Civil society organizations would certainly benefit from greater government cooperation. This would ensure that an enabling environment is given to operate effectively, to inform, mobilize and ensure every citizen has his/her human rights protected. The role of CSOs is fundamental for ensuring that development and social change are aimed at ending inequality and unfairness.

At present, CSO'sinvolvement in policy making is not strong and systematic, worsens by the lack of networking skills and spaces, and reduced knowledge in the area of policy formulation and advocacy strategies. CSOs must make themselves available to participate in policy planning, at least in regard to review and interpret the policies for the public. Ideally, the organizations must initiate a policy dialogue with government and build coalitions, partnerships and networks around policy issues prioritized by the communities. This will give the CSOs an opportunity to have a voice in policymaking that represents the values, beliefs, culture and perspectives of their constituencies.

The legal structures of CSOs interviewed are at a minimum compliant with local standards: they follow guidelines and have principles that guide their work. However, staff and management are not well versed on the relevant government legislations such as the NGO Act to follow it thoroughly. The majority lacks strategic plans and strong policies togovern areas of the organization such as human resources, finance, funding policy, and procedure manuals that are well developed and updated.

The lack of own funding, independent from donors, hampers the sustainability of project activities as well as the effectiveness of the civil society organizations to respond to the needs of the people they serve.Sustainable development that successfully brings equitable development to all citizens will suffer if CSOs cannot thrive independently.

On one hand, INGOs have a great influence on the goals and vision of the CSOs. On the other, the CSOs recognize that they must comply with the INGO's requirements since they lack access to other sources of funding. A united voice would compel both donors and government to address the CSOs as a unit to improve the current lack of coordination and networking that is hampering CSOs to have strong efficacy in their work.

5. RECOMMENDATIONS

Civil Society Organizations

- Establish effective boards of directors that provide greater oversight, leadership and funding opportunities and that have a clear understanding of roles and responsibilities of staff and the board.

- Improve the productivity of the CSOs work with strong strategies and measures to evaluate the relevancy, credibility and sustainability of their programs with transparency and accountability.

- Reinforce internal controls around corruption and establish active accountability, not only following donor requirements, but the practice and implementation of more effective anti - corruption policies and mechanisms to promote internal sound financial and resource management.

- Build local capacities through the promotion of ongoing learning and adaptation within the organizations. Build, develop, and strengthen the CSO's capacity - through skills development and training - to improve the competency of staff.

- Skills building should also be a long - term investment. Integrate capacity building activities at different levels of the organization to address complex problems that exist both within and outside of the organization. Ensure that there is broad - based participation from the staff with a locally driven agenda and ownership.

Civil Society in Puntland

- Improve the network of civil society organizations focusing on their coordination and collaboration to have a collective impact. Differentiate civil society organizations focus area, establishing partnerships where they complement each other and share information between them.

- An advocacy network needs to bring together the CSOs across multiple sectors to deliver real and lasting social, economic and political change. Create an advisory committee of CSOs that advices government bodies on policy and laws related to socio-economic issues.

- A long-term vision is necessary to identify roles and responsibilities and strengthen capacities to form strategic partnerships and effective coordination between actors for a stronger, lasting and sustainable civil society.

Government

- The government should take an active role in creating a conducive and enabling environment for the civil society organizations and enforce acts that support CSOs to make an impact for the people they serve.

- Apply greater oversight on legislation, its proper implementation and adherence in accordance with Puntland State Government laws binding the International Non-governmental Organizations (INGOs) to not compete with local organizations on funds that are less than $250,000 as stipulated by the Puntland NGO Act.

- The Puntland government has also a role to play regarding an enabling environment that is conducive to the effective functioning of the media by reducing restrictions and access to information for journalists and CSOs alike.

The International Community

- CSOs should not be an agent of delivering projects or simple implementing contractors, but equal partners who can respond effectively to the needs of the society.

- Establish access to funding for CSOs for strengthening their capacities in reaching a sustainable organizational structure that is not donor's dependent. Additionally, CSOs should explore and use local revenue sources to sustain their work after the external funding resources cease.

- International donors should support capacity building and knowledge maintaining initiatives to develop skills and abilities and to ensure that CSOs build strong partnerships with government agencies and other CSOs based on complementary technical niches.

- Umbrella organizations in Puntland - whose main goal is to influence policy makers and donors to improve the existing environment for CSOs - should be doing more as advocates of civil society.

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ANNEX 1: CSOs INTERVIEWED

Name of the Organization	Date of Establishment	Location	Contact Details
KAALO Relief and Development	March, 1991	Garowe, Puntland	0907711106
Mudan Youth Network	20/08/2003	Garowe, Puntland	0907742228
Tadamun Social Society (TASD)	10/11/92	Garowe, Puntland	0907798815
Puntland Youth Association Network (PYAN)	15/09/2015	Garowe, Puntland	0907757298
Somali Agro Action Community (SAACOM)	15/07/2003	Garowe, Puntland	0907781821
Puntland NonState Actors Association	13/10/2008	Garowe, Puntland	090 7797368
Somali Women Association (SWA)	23/03/1993	Garowe, Puntland	0907555567
Media Association Puntland (MAP)	16/03/2009	Garowe, Puntland	0907737882
Somali innovation Hub	21/02/2018	Garowe, Puntland	0907791970
DeegaanRelief Development Organization (DRDO)	1/6/07	Galkayo, Puntland	0907795301
Dud Mudug Youth Organization Umbrella	14/10/2002	Galkayo, Puntland	0907798254
Galkacyo Education Center for Peace and Developmen (GECPD)	7/10/99	Galkacyo, Puntland	0907795111
Galkayo Medical Foundation (GMF)	2/11/09	Galkayo, Puntland	0907 790 099
Horseed Peace and Development	3/11/04	Galkayo, Puntland	0906791810/ 0907759925
Lama Huraan Organization	6/12/17	Galkacyo, Puntland	
Puntland Minority Women Development Organization (PMWD)	12/7/11	Galkacyo, Puntland	0907795960
Skills for Youth Center (SYC)	20/05/2009	Galkayo, Puntland	907750400
Somali Birth Attendants Cooperative Organization (SBACO)	26/05/1994	Galkacyo, Puntland	0613756626
Somali MinorityWomen and Children Development (SMWCDO)	29/09/2003	Galkayo, Puntland	907795968
Somali Women Concern Renationalization and Peace Organization (SWCRPO)	5/3/02	Galkayo Puntland	
The Asha Gelle Foundation (TAGF)	6/2/13	Galkacyo, Puntland	0907795494
Somali Society Development Association (SOSDA)	8/9/98	South Galkayo, Galmudug	0617150475
Madasha Nabada	12/5/17	Galkayo South, Galmudug	0615342401

ANNEX 3: PUNTLAND GOVERNMENT LAWS

LAWS ACTS	YEAR OF ENACTMENT AND ACT NO	RELEVANCY
Puntland Non - governmental organizations Act (NGOs Act)	LN 3 / 2016	To create a central mechanism that regulates local and International NGOs
The Puntland labor law for private business and organizations	LN 65 / 2011	To protect the rights of the employees and employers for private and nation al and international organizations
Anti -Rape Act	LN 8 / 2016	The criminalizes a wide range of sexual offences including rape, sexual assault, sexual exploitation, sexual harassment and so on, and set out clear duties for police, investigators and prosecutors. It sets out a number of guarantees for survivors including the right to free medical care and to privacy in court.
Puntland Juvenile Act	LN 12 / 2016	The law establishes special procedures , for children in conflict with the law and requires the establishment of specialized units within the police, the judiciary, the court system, the prosecutor's office, as well as specialized defenders or other representatives who provide legal or other appropriate assistance to the child.
Anti - FGM Act	2011	This act criminalized female genital mutilation but lacks clarity on offences and punishment and therefore, there new FGM bill passed by the cabinet in 2018 which criminalizes all forms of FGM and sets clear punishment for offences and instructs law enforcement agencies to prosecute offenders.
Somali Civil Code	1973	The law covers the whole gamut of civil law including obligations (contract law and tort), property law (real and personal).
Somali Penal Code	LN 37 / 1962	The code comprises of 3 books, the first one covers general principles, the second focuses on crimes including crimes against public administration such as peculation, misappropriations and embezzlement of public funds, extortion and Corruption by public officers. Book three covers a wide range of contraventions .
Puntland Taxation Legal Framework	LN 3 / 2014	This framework is based on 1965 taxation law. It provides types of taxes to be levied by the government including in land revenue tax , sales tax, income tax and so on.
Puntland Media Law	LN 5/ 2016	Law that regulates media and protects freedom of press

About SIDRA

SIDRA is a registered independent, non-profit Research and Policy Analysis Think Tank based in Garowe, Puntland, Somalia

Our Vision

Somalia in which social justice prevails and inclusive economic growth benefits all and improves the well being of all people.

Our Mission

A centre of development and research that generates relevant and original knowledge for dynamic policy environment support, institutional capacity development and alliance

CONTACTS