

**REVIEW OF THE 1990 NGO COORDINATION**

**CSO LEADERS REGIONAL CONSULTATION MEETINGS**

**SUMMARY REPORT**

**March to May 2010**

## **1.0 Background to the NGO Act Review Process**

The review of the NGO Act project has been conceptualized against the backdrop of the prevailing wave of reforms in the country; indeed, the recently released harmonized draft constitution requires the State to take legislative measures and adopt policies that promote the participation of civil society in all levels of government, hence the need to take advantage of the prevailing political will to ensure it is channeled in a positive direction for civil society. Consequently, this project seeks to secure the involvement of the civil society in the process of reviewing the current legislation in particular, as well as reforming the sector in general.

It widely and publicly perceived that the sector is currently fragmented and is facing a myriad of challenges not the least being that it no longer has a common voice, a role that was intended to be played by the NGO Council. Wrangles and subsequent divisions at the Council have rendered this impossible with the result being a disempowered civil society that is therefore unable to come together to push forward issues of common interests. In addition, the sector has not been as accountable as it should be partly due the lack of an enabling regulatory and institutional framework for effective self-regulation. The set up of the NGO Coordination Board as a government body has also posed several challenges to the sector as it is prone to political manipulation and interference. Effective regulation involves a CSO regulator (ideally, independent from government) that is well-regarded by other government departments and the CSO sector in general.

This project therefore is aimed at facilitating a process that will result in regulatory and institutional reforms that will enable the civil society sector grow, thrive and have a voice. An enabling legal environment is essential in this regard as it will ensure good governance of the sector on the one hand while protecting legitimate civil society activity on the other.

Indeed, the promoters of this initiative believe that there is a real opportunity here for Kenya to reverse the trend of overly restrictive and ineffective regulation as seen in most of sub-Saharan Africa and develop into a regional beacon, helping to encourage better practice elsewhere in the continent.

### **1.1 Goal**

The ultimate goal of this project is to improve the regulatory environment for non-governmental organizations (NGOs) in Kenya, thereby advancing the opportunity for increased regulatory efficiency and transparency, increased sector capacity and accountability, and strengthened development of dialogue between civil society and the government.

### **1.2 Project Objectives are:**

- **Coordinate and support the activities of a group of civil society experts, CSO reference Group, to produce a framework that will guide the review process.**
- **To facilitate a representative and informed consultation with civil society on the review of the NGO Act by November 2010.**
- **To facilitate an effective consultation with other Key stakeholders by February 2011.**

## **1.2 CSO Reference Group**

In order to create legitimacy for this CSO driven initiative in the absence of leadership by a CSO umbrella body (read NGO Council), the promoters of this initiative put together a leadership group for this process under the **CSO Reference Group**. The reference is made of CSO experts who are motivated in seeing that a new an enabling legislation is put in place through a rigorous but consultative process. The roles of the CSO Reference group are to lead the CSO consultation process, provide the face of the review process, develop and implement the strategy for this review including advocacy and communications strategies and act as an oversight of the PEN Secretariat. Poverty Eradication Network (PEN) is currently providing the secretarial services to the CSO reference group.

## **2.0 The Consultation Process**

The consultation process has been undertaken on two fronts i.e Through two national CSO leaders' consultation fora and 8 Regional CSO Leaders Consultation Meetings. Two national CSO leaders' consultation fora have been held. The 1<sup>st</sup> was held on 30<sup>th</sup> September 2009 at PanAfric Hotel, the second was held on 16<sup>th</sup> February 2010. The objectives of the national consultation forum were to engage and seek support of CSO leaders in the review process of the 1990 NGO Coordination. Eight regional CSO leader's consultation workshops were carried out

### **2.1 Regional CSO leader's consultation Meetings**

The regional CSO leader's consultation meetings were aimed at educating regional CSO leaders on the current legislation, the Sessional Paper and key issues to be addressed in future legislation. Recommendations from these workshops have been used to develop the general key principles (see attachment) and issues which will inform the drafting of the CSO Bill

The eight regional CSO leader's consultation workshops were held in Kisumu (for North Nyanza region), Kakamega (for Western region), Narok (for South Rift region), Eldoret (for North Rift region) , Karatina (for Central Kenya Region) and Garissa (for North Eastern ), Homa Bay ( for South Nyanza) and Mombasa (For South Coast).

### **3.0 Outputs from Regional CSO leader's consultation Meetings**

#### **3.1 Process, Objectives and Content of the Meetings**

The planning for the regional consultation meetings were facilitated by staff of PEN, the secretariat, in consultation with CSO leadership of each region. The local CSO leaders identified and mobilized the representatives of various local organizations who attended the meetings. The purpose of involving the local leadership in mobilization was to build support and local ownership for the process ensuring legitimacy for this project.

The objectives of these regional meetings were to:

- To inform regional CSO leaders on the context, process and issues involved in the review of the 1990 NGO Coordination Act .
- To enable regional CSO leaders to give informed recommendations on what they would like to see included in the revision of the Act.
- To mobilize, encourage and built support for CSO leaders to continue engaging with the review process and its advocacy component.

The content of the meetings included presentation on the context and status the review process; overview of current laws and policy documents including the NGOs coordination Act no. 19 of 1990, 2007 amendments to the NGO Act, and Sessional paper 1 of 2006. The participants were also introduced to what would constitute the key issues that needs to be addressed by the new legislation.

The participants also discussed the external factors that constrain CSO effectiveness and identified which of the factors could be addressed by a new legislation. The participants were also given an opportunity to discuss and contribute ideas on how the various external factors and other key issues should be addressed by the new legislation.

#### **4.0 Context and status of the review process**

The participants were taken through the history and context of the CSO legislation process in Kenya. This was a mirror of civil society during various eras including: pre colonial era, colonial era, early independence (Kenyatta era), Moi era, and the era of NARC/Grand coalition government. Most of the issues covered in this section were already put into a background

document which was part of the folder given to each participant, a brief summary which is provided.

It was noted that prior to the 19<sup>th</sup> Century, Kenyans lived in communities, which were characterized by strong patterns of social ties and relations. People came together to promote mutual interests, pool resources, express ideas and participate in the governance of their communities as the communal structures afforded them the vehicles to do so. These structures included ethnic and kinship groups such as families, clans and lineages, as well as councils of elders and age groups.

Associational life is still deep rooted in Kenya. It forms the basis on which *Harambee* (self help) initiatives thrive. However, the term civil society is relatively recent and is often associated with quests for social transformation and the realization of social justice. From the early 1920's till 1963, Civil Society Organizations (CSOs) played a prominent role in the struggle for independence from colonization.

Hence, colonial conditions worked to restrain growth of the sector. This was done to prevent interaction between the natives. Restrictions against social organizing accelerated during the emergency period (1952-1960). The restrictions aimed to prevent the spread of Mau Mau peasant rebellion, which organised against the state mode of rule and expropriation of land. The post-colonial period and subsequent consolidation of state power saw a continuation of this trend.

Successive post-colonial governments constrained the space for CSOs by restricting the space for organisations that provided political forums for government critics. This approach is evident in the legislation that was passed to regulate registered associations, that is, the Societies Act, Chapter 108, Laws of Kenya. The Statute was passed in 1968 as an "Act of Parliament to make provision for the registration and control of societies". It gave wide discretion to the Registrar of Societies and sweeping powers to various government officials with respect to investigating, arresting, entering and searching the premises of any society. Further, where it is alleged that a society is an unlawful society, the burden of proving that it is a registered or exempted society or that it is not a society shall lie with the person charged.

The efficacy of this Act to provide an enabling legal framework for CSOs as a whole was however wanting as there was and continues to be extensive cooperation between the state and CSOs delivering development services. Since independence, the latter have complemented and cooperated with government in the delivery of services. Hence, in 1990, the NGO Coordination Act No. 19 of 1990 was passed "to make provision for the registration and coordination of NGOs in Kenya and for connected purposes".

The context in which the Act was promulgated was, however, highly charged with mistrust and suspicions between the government and NGOs. After the government proposed and passed the NGO Coordination Act, NGOs reacted strongly to the law. The latter claimed that the law's provisions were not enabling but aimed at stifling and controlling the sector. A frenzied series of consultations in the sector resulted in proposed amendments, which were later effected as part of the law by the government.

Many in the government and NGO sector later questioned the efficacy of having a law on NGOs in the absence of a national policy on NGOs. Where the law was silent or gave rise to confusion, there was no general framework of which to refer. In 1996, the NGO Coordination Board decided that there was need for a national policy on NGOs. The executive committee of the NGOs Council, the national umbrella body of NGOs also reaffirmed its commitment to the development of the policy. The NGO sector and GoK commenced the process of formulating a policy in late 2002. By May 2004, an NGO Sector Policy was agreed upon.

In the meantime, the sector slowly descended into disarray without a common voice/agenda particularly from November 2004 when the NGO Council started getting entangled in the politics of the day. This was followed by various efforts to rescue the Council, without success.

It was not until July 2006, that Parliament adopted Sessional Paper No. 1 of 2006 on NGOs, which was aimed to enhance regulation of the sector amongst other things. The Sessional Paper calls for a new NGO law. It also:

- Recognizes NGOs' contribution to the economy;
- Emphasizes the government's commitment to engage the NGO sector in development and policy making;
- Expresses the Government's expectation that NGOs will operate more transparently;
- Gives a new, wider, definition of NGOs;
- Recognizes the role of NGO Council and NGO Coordination Board; and
- Proposes mechanisms for better regulation and coordination.

Some of the problems being faced by the sector today are as a result of issues that were never anticipated, for instance, leadership wrangles and warring factions of the NGO Council; declining standards and professionalism, largely due to the lack of an enabling regulatory and institutional framework for effective self-regulation; the exponential growth of the sector and the limited capacity of the NGO Coordination Board to effectively regulate the sector.

The answers to the challenges facing the sector lie in reforming the sector *in toto*. This includes reviewing the legislation informed by the lessons learnt from the implementation of the current law and more importantly, carrying out institutional reforms for a new culture to be nurtured in the sector.

Sessional Paper No. 1, which is the NGO Policy anticipates and proposes a comprehensive review of legislation governing the operations of the NGOs sector: Though the Policy states that, “the new legislation will be based on this proposed policy”, the government appreciates that the context in which the Policy was formulated has changed and CSOs are not happy that some of their inputs were ignored, or that additional content was introduced, in the final Sessional Paper.

#### **4.1 About the Current Review Process**

The participants were also given a brief about the current process of the review of the NGO Act. Noting that some over 6000+ Charitable, Not-for-Profit, Voluntary, Public Benefit Organizations are legally registered to operate in Kenya under the 1990 NGO Coordination Act. Others are registered under alternative legislation pre-dating the NGO Act or are established by their own Act of Parliament during the pre-independence era. In 2006, Kenya’s first policy paper on the Not-for-Profit sector was promulgated.

It was also reported that in 2008, through a cabinet memo, the NGOs Coordination Board was given responsibility to redraft the NGO Act in line with the Sessional paper no. 1 of 2006 and current needs of the sector.

The role of Poverty Eradication network (PEN), the secretariat to this process was also elaborated. It was noted that during the past eight years, Poverty Eradication Network (PEN) has worked variously with the NGO Coordination Board, the ill-fated NGO Council(s), Civil Society Organization (CSO) regional networks, and a wide variety of not-for-profit organizations. PENs objective has been to strengthen civil society in Kenya and promote CSO development effectiveness.

Working in collaboration with the NGO Coordination Board, the International Centre for Not-for-Profit Law (ICNL) and the Charity Commission of England and Wales, PEN facilitated two workshops for national level CSO leaders (30<sup>th</sup> September, 2009 and 16<sup>th</sup> February 2010) in Nairobi. These were the first in a series of workshops, which are intended to cover several regions of the country. They are aimed to engage CSO leaders in the participatory review of the 1990 NGO Coordination Act and to generate consensus on the first draft of a framework document for wider consultations with CSOs.

Following the two national CSO Leaders Workshops in September 2009 and February 2010, a CSO driven review process was initiated slowly gained momentum. This initiative is led by a CSO Leaders Reference Group. CSO Reference Group is made of CSO experts who are motivated in seeing that a new an enabling legislation is put in place through a rigorous but consultative process, legitimizing it in the absence of leadership by any other CSO umbrella body (read NGO

Council). It was further noted that Poverty Eradication Network (PEN) is currently providing the secretarial services to the CSO reference group.

The process consists of comparative research, education and information sharing, participatory national and regional workshops, drafting submissions to the Revised Act, and an advocacy strategy for the sector, public, media, parliamentarians and other key stakeholders. This initiative has been largely self-financed by interested CSOs, with financial support for the national workshops from ICNL and the UK Charity Commissioners, and a USAID grant through PACT to support the secretariat and costs of regional workshops.

The International NGO Country Directors group (INGO CDs) and the East African Association of Grant Makers (EAAG) have begun their own reviews of the NGO Act and have assigned representatives to the CSO Leaders Reference Group. Each region has also established its own reference group for this process.

## **5.0 Group Outputs on external factors that constrain CSO Effectiveness**

In all the eight regional CSO leaders meetings, the participants were given an opportunity to discuss what they thought were the key external factors that constrain CSO effectiveness in Kenya. The participants were also required to identify those external constraints that they thought would be addressed by a new legislation. The following are the summary of the constraints from all the 8 regional meetings.

### **5.1 Constraints**

- Weak legislative environment with many registration regimes for CSOs in Kenya- NGO Act, Trust Act, Companies Act.
- No provision in the current NGO coordination Act no 19 of 1990 for supporting NGOs/CSOs by NGO Board Coordination Board. It provides the NGO Board with the role of only policing the NGOs.
- Lack of proper policies and guidelines for regulation of CSOs in Kenya.
- The fees for services charged by both the NGOs Coordination Board and NGOs Council are exorbitant and most small organisations cannot afford.
- Lack of political goodwill for CSOs in Kenya and restrictive legislation: - This Limits open exchange of information amongst the CSOs. Examples include the fact that CSOs require authority from the local provincial administration and permits for their activities (even when undertaking grassroots awareness raising). Even provincial administration does not understand the legal environment of CSOs.
- CSOs not consulted during policy making process yet it is such a huge sector in Kenya.

- Civil society is politicized –some CSOs are started by politicians, while some CSO Leaders are seen as competitors to local politicians.
- The civil sector is no longer a value driven sector as anyone can register an organization, as there is a Lack of proper vetting process of those who register CSOs.
- Generally weak leadership and poor governance at all levels of society; corruption generated through complex protocols.
- limited access to devolved funds by CSOs e.g. local authority transfer funds (LATF), no provision for CSOs to access funding from the constituency development fund (CDF); were there are some local funding for CSOs e.g. from NACC (National Aids Control Council), there is the challenge of political patronage– Independent NGOs disadvantaged.
- Difficulty in implementation of certain projects by CSOs due to bureaucracy in registration like children homes, schools, water projects e.t.c.
- No financial support by government yet CSO are complementing government work; Reluctance for government to give funding support to CSOs and CSO networks – especially those perceived as “well off”.
- Tax exceptions-it is very cumbersome for CSOs to get tax exemption certificates from the government. Sometimes the process is too expensive for the value of the tax exemption.
- Limited interests and restrictions on funding of CSOs NGOs by donors.
- Too much dependency on external donors, effects of shift in donor funding and development paradigms.
- Conservative cultures- not ready to change (resistance to change) by beneficiaries and local community / used to free handouts/limited education.
- CSOs desire for consultation and participation in development activities is sometimes seen as interruption by other stakeholders including the government.
- Lack or weak networking amongst the CSOs resulting in poor coordination at local, national and regional levels; divided membership and loyalty -two Western CSO networks fighting for space to serve the same group of organizations; leadership wrangles within the umbrella networks(NGOs Council).
- Unclear reporting systems/channels for CSOs.
- Duplication of programmes and negative competition (rather than collaboration) among CSOs.
- Limited internal capacity within CSOs – most CSOs have difficulty in sustaining high performing technical staff; some CSOs organisational structures are questionable; some are one mans’ show (MONGOs), cases of briefcase NGOs spoil the reputation of the good CSOs.
- Weak leadership generally in the sector after the election of NARC government in 2003 due to poaching of resourceful leaders from Civil Society to government.
- CSOs Unpreparedness for emerging issues – difficulty in adapting to emergency issues e.g. post 2007 election violence that rocked the country in early 2008.

- Limited access to emergency funds (e.g. post emergency, post election).
- Majority of core funds goes to indirect costs of donors and intermediate /grant making organizations.
- Most CSOs have weak business and marketing strategies.
- Inadequate quality work due to non adherence standards and weak monitoring and evaluation systems.
- Lack of transparency and accountability by CSOs- poor credibility.
- Lack of trust from the local community - challenge for CSOs to build the trust.

## **5.2 Suggestion on how to address constraints**

The following are the summary of the suggestions from the participants from all the 8 regions on how the external constraints could be addressed.

- Develop anew legislation to for the smooth running and regulation of CSOs -there should be a special ministry for the CSOs as the sector is very huge.
- The act should provide for the independence of the CSO/NGO Coordination Board and make it very clear on the appointment of members of the Board. There is need to ensure equal representation in the NGO Coordination Board from all regions. The new act should ensure that the services of the Board are decentralized.
- The act should ease the registration process through eliminating the need for NSIS to vet CSOs, removal of the clause threat to 'national interest' which is usually as means for rejecting registration. If however, there will be need for vetting of new CSOs, this should be done at the locality of operation and should be simplified. In this age of IT, the Act should provide for online registration.
- Minimize the fees for registration/regulation- some of the current fees should be done away with e.g. fees for change of names, annual returns, letter of opening bank accounts.
- Any CSO that is denied registration or that is deregistered should be given reasons, and a hearing to defend itself.
- The act should give guidelines on terms and conditions that should be attached to the certificate of registration including reporting system.
- Recognition of CSOs by all government structures/arms upon registration and CSOs should have the freedom of delivery of services to community(s) without any restriction, and hence the need for them to be assured of security by the government.
- CSOs should be automatically receiving tax exemptions certificates upon registration. Tax exemptions issues should be done by the NGO Board not Ministry of Finance.
- There is need to encourage local NGOs to collaborate with the international NGOs, so that services are not duplicated.

- The government should be able to create a basket fund to support the CSOs both at the national and grass root level; and local funds for CSOs just like the current devolved funds like CDF, LATF, etc.
- The new act should encourage the participation of CSOs in policy formulation and implementation.
- NGO Accountability and transparency requirement. There is need for minimum standard of governance by CSOs.
- CSOs should come up with their own self regulations body.
- The new act should provide for a clear CSOs code(s) of conduct that will guide all CSOs and their networks.
- The new act should encourage the existence of self regulating networks like “Viwango”, and National Civil Society Congress (NCSC) .
- The act should provide for the recognition of CSOs as important development partners by government and provide for provision of funding allocation from the consolidated fund.

## **6.0 Outputs on Key Issues**

The following are the inputs of the participants on the 6 key issues that the new legislation should address. These are the summary of the outputs from group from all the eight consultation meetings.

The participants gave their inputs on the following key issues:

- Fundamental Principles and Context
- Definition of Act and inclusivity
- Motivation and Value added of CSO registration
- CSO Coordination Board roles and functions
- CSO Accountability and Transparency requirements
- Self-Regulation Provisions

### **6.1 Fundamental principles and context**

- The law should recognize the right to set up and establish organizations-the law must clearly state the minimum time for registration (recommend two weeks).
- Freedom of association, rights and recognition should be captured in the new law.
- The new law should allow informal/ unregistered and registered CSOs to exist.
- CSOs have a right of cooperation and networking.
- Right of CSOs to engage in advocacy and lobbying- Legislation on protection of public demonstrations.
- CSOs should be provided with an enabling environment and security by the government.
- Government involvement in civil society sector should be restricted to legitimate issues.
- Transparency and accountability.

- While CSOs have a right to freedom of association and cooperation, for achievement of this purpose CSOs should not be compelled to join the NGO Council.

## **6.2 Definition and inclusivity of NGOs**

There was generally no consensus on which forms of CSOs should be included in the new legislation. Some people thought that the various forms of CSOs should continue being registered/regulated under different regimes as is currently done. It was clearly stated that CSOs like SHGs, CBOs, and FBOs work on a smaller scale geographically and have different missions, visions, and objectives from that of NGOs, their registration therefore should remain the same as is currently.

Other views were that the new Act should get rid of all the current registrations regimes including the NGO Board, NGOs bureau, NGOs Council and allow the registration of all CSOs to be done by a small unit within the companies registry in the attorney general chambers.

Others felt that the new Act should provide for one place for registration of all CSOs like the NGOs coordination board and that such a body should decentralize its services.

## **6.3 Motivation and values added of NGO registration.**

- When registered, the new act should allow CSOs become legal entities or body corporate – wider recognition.
- It gives legal recognition to CSOs act on behalf of the community.
- The registration should provide CSOs acceptance by donors and other development partners.
- The Act should provide that for CSOs to access funding from government (like CDF) they need to be registered under the new act. The government should only provide financial support to registered NGOs under the new act.
- The act should provide for the registration of CSOs at the grass roots (local Level)-district headquarters, provincial headquarters- to save on time- registration – shorten the process.
- Government should support CSO playing specific roles registered under the new act.
- Tax exemptions for all registered CSOs, but need for clear tax exemption provisions to reduce abuse of this privilege. Issue of taxes - should be done by the new CSO/NGO Board and not Ministry of Finance.
- Registered organizations should be motivated by being provided with capacity building by the Board e.g. on good governance, resource mobilization, financial management – this is because CSOs are providing critical service to the community, complementing government work.

- The Act should make provision for CSOs to only pay registration fees after which they will be free to do their operations including opening a bank accounts without paying any other fees.
- There is need for the registration Body to issue annual certificate of compliance to CSOs to increase their profile- may lead to access to more funds.
- The Act should provide that only registered CSOs can be represented on the local development funds committees e.g. CDF committees.
- Involvement of registered CSOs in policy making.
- NGO Board to be transparent to the public.

#### **6.4 CSOs NGOs board roles and functions**

- NGO Board Should be made leaner (downsized) and renamed- “Kenyan CSOs registration and advisory board” or “CSOs Council of Kenya”. The new regulatory body should be independent from the government influence and any form of political interference.
- The roles of the new regulatory body should include:
  - To handle issues of registration, taxation and other functions (limit of bureaucracy in the system)
  - Receive annual returns from active CSOs
  - Drafting of CSOs bills for tabling in parliament
  - Monitoring the work of CSOs
  - Enables linkage with other organizations and donors
  - Give advice on the standards of operation.
  - Keep data base of all existing registered CSOs.
  - Recommendations and certificate of statutory compliance to donors
  - Act as a bridge between CSO and government on statutory issues
- Registration of CSOs should be decentralized to fasten the process.
- The act should clearly state the criteria, qualifications and experience of members of the board. Majority of Board membership should be drawn from the CS sector. Members of the Board may also be drawn from CSO networks.
- The act should define the “Coordination” role of the Board.

#### **6.5 NGO accountability and transparency requirements.**

- The act should state that all CSOs should be transparency and accountable to its stakeholders.
- Simplify reporting requirements to the Board for CSOs -computerise for faster compliance.
- CSOs should report on

- Good governance
- Organizational structure
- Vision and mission statements
- Sources of donor funding
- Audited financial
- The new act should provide that every CSO should:
  - Adhere to a Code of conduct.
  - Have a monitoring and evaluation system in.
- The act should state that all CSO reports should be accessible to stakeholders and public.
- There is need for the new act to provide for the establishment of a well defined oversight body/ Complaints board.
- All CSOs should be accountable to the community and other stakeholders.
- Encourage beneficiary participation during planning, implementation, monitoring and evaluation.
- Share work plans with line government departments.
- CSOs should also give information to the Board on:
  - Area of operation e.g. District, etc
    - Target group – women, youth
    - Priority area – activity of project
    - Partners

## 6.6 Self Regulation

- The new law should provide for CSOs to come up with their own self-regulations mechanism - It will free the NGOs of from NGO Council whom they have been forced to become members by the current act ; forcing NGOs to be members of the Council contravenes the bill of rights for the freedom of association.
- Delete NGO council from the act and replace with regional voluntary coordinating bodies whose officials are elected from existing CSOs for a specific period of time timeframe preferably three years.
- Encourage the establishment of strong thematic networks e.g. health, gender, etc.
- CSOs should be members of the oversight body established by the NGO Board.
- The act should encourage the development of CSOs standards and ethics/code of conduct.
- Complaints Board/ oversight body (*Strengthened Regulatory committee*) that is independent from the regulator will address challenges amongst the CSOs. It will also devise mechanisms for penalties – deviation, disciplinary issues etc.

- All CSOs should have founding documents clearly defines the mandate of the CSO, roles and functions of the governing bodies among other issues.
- Delete NGO council replace with regional voluntary coordinating bodies whose officials are elected from existing NGOs for a specific period of time timeframe preferably three years.

## **7.0 Way forward**

Participants were also given the opportunity to share how they think this new initiative on the NGO Act review should proceed after the conclusion of the regional consultation meetings. The following is a summary of their suggestions.

- Document the proceedings from all the regional meetings and share report with CSOs.
- Regional CSOs to send feedbacks to CSOs reference group through the secretariat.
- The Act is being reviewed but there is need for feedback session before enactment -final CSO bill should be shared/discussed by CSO regional leaders in another round of regional meetings.
- There should a national stakeholder's forum to adopt the final document.
- The secretariat should develop an advocacy/communication strategy for engagement with other stakeholders.
- There is need to consider East African community issues on CSOs and their implication on the new law.
- Engage in online dialogue through the NGO Board.
- Use other avenues to engage other in this debate – other workshops, share information with local members of parliament.
- Mandate the CSO reference group to continue leading this process.