



2014 CSO SUSTAINABILITY INDEX

FOR SUB-SAHARAN AFRICA

The 2014 CSO Sustainability Index For Sub-Saharan Africa

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INTRODUCTION

USAID is pleased to present the sixth edition of the CSO Sustainability Index (CSOSI) for Sub-Saharan Africa. This year's Index covers civil society organizations (CSOs) in twenty-five countries across Sub-Saharan Africa. It addresses both advances and setbacks in seven key components or "dimensions" of the sustainability of the civil society sector: legal environment, organizational capacity, financial viability, advocacy, service provision, infrastructure, and public image.

The Index's methodology relies on the knowledge of CSO practitioners and researchers, who in each country form an expert panel to assess and rate these dimensions of CSO sustainability during the year. The panel agrees on a score for each dimension, which can range from 1 (most developed) to 7 (most challenged). All of the scores are then averaged to produce an overall sustainability score for the CSO sector of a given country. An editorial committee composed of technical and regional experts reviews each panel's scores and corresponding narrative reports, with the aim of maintaining consistent approaches and standards so as to allow cross-country comparisons. The Index groups all scores into three overarching categories—Sustainability Enhanced (scores from 1 to 3), Sustainability Evolving (3.1-5), and Sustainability Impeded (5.1-7). Further details about the methodology used to calculate scores and produce corresponding narrative reports are provided in Annex A.

The Index is a useful source of information for local CSOs, governments, donors, academics, and others who want to better understand and monitor key aspects of sustainability in the CSO sector. The CSO Sustainability Index for Sub-Saharan Africa complements similar publications covering other regions, which include reports on twenty-nine countries in Central and Eastern Europe and Eurasia, seven countries in the Middle East and North Africa, seven countries in Asia, as well as Afghanistan and Pakistan. These various editions of the CSO Sustainability Index bring to seventy the total number of countries surveyed.

A publication of this type would not be possible without the contributions of many individuals and organizations. We are grateful to the Aga Khan Foundation, which supported the assessments of Kenya and Mali, and the implementing partners, who played the critical role of facilitating the expert panel meetings and writing the country reports. We would also like to thank the many CSO representatives and experts, USAID partners, and international donors who participated in the expert panels in each country. Their knowledge, perceptions, ideas, observations, and contributions are the foundation upon which this index is based.

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¹ The CSO Sustainability Index for Afghanistan and CSO Sustainability Index for Pakistan are made possible by the support of the Aga Khan Foundation.

EXECUTIVE SUMMARY

The 2014 CSO Sustainability Index for Sub-Saharan Africa offers a snapshot of seven key dimensions of the CSO sectors in twenty-five countries of Sub-Saharan Africa. In many ways, the country reports reflect larger developments in the countries surveyed and across a continent experiencing great political and economic change. As CSOs pushed for citizens' rights and provided essential services to needy populations in 2014, they responded to shifting political, economic, and social contexts that tested the strength of the CSO sector and suggested avenues for its future development.

Among the contextual issues affecting CSO performance in Sub-Saharan Africa in 2014, the following common themes stand out.

- Armed conflict. Several countries in Sub-Saharan Africa continued to be wracked by violence, terrorism, or civil war in 2014. For example, in Sudan, hundreds of thousands of people were displaced as hopes of a breakthrough in political negotiations between the government and the Sudan People's Liberation Movement-North (SPLM-N) were dashed and armed conflict resumed in Darfur, Blue Nile, and South Kordofan. A dire humanitarian crisis affecting more than five million people emerged in South Sudan in the wake of an extended clash between rival political and ethnic factions that broke out in December 2013. In Nigeria, Boko Haram militants abducted more than 270 schoolgirls in Chibok, while in Kenya, more than 130 people were killed in terrorist attacks, and clashes between separatists and government troops resumed in the northern regions of Mali. These and other conflicts killed or maimed thousands of people and caused extreme suffering for millions more. Yet precisely as the need for their services was most acute, CSOs sometimes found it difficult to reach affected populations because of the violence, government restrictions on movement and other freedoms, and direct threats to CSO workers.
- Human rights. In 2014 the space for the exercise of civic freedoms contracted in a number of countries in Sub-Saharan Africa. In Uganda, a retrogressive Anti-Homosexuality Bill was signed into law and later struck down by the Constitutional Court on the grounds that it was passed illegally without a quorum. Ethiopian journalists and opposition leaders were arrested on allegations of involvement with terrorist groups and a large number of CSOs were shut down. The National Legislative Assembly of South Sudan passed a new security bill that gives the National Security Services sweeping powers to arrest and detain suspects without warrants. In The Gambia, there were instances of arbitrary arrest, detention, and torture of individuals with politically divergent views while amendments to the Criminal Code put heavy sentences on "aggravated homosexuality." In Rwanda, politically motivated arrests and disappearances were reported. These and similar developments in other countries discouraged the free expression of dissident opinions and created a climate of fear and self-censorship among CSOs.
- Elections. National and local elections that took place throughout Sub-Saharan Africa in 2014 provided an important focal point for advocacy organizations and their activities. South African human rights and civic organizations worked with the electoral commission to plan local campaigns for voter information, registration, education, and election monitoring. A key element of these campaigns was the engagement of unemployed youth in the electoral process. In Uganda, CSOs launched the Free and Fair Elections campaign to provide an opportunity for citizens to deliberate on a wide range of constitutional and electoral reforms in the run-up to the 2016 national elections. In Mozambique, the Txeka project brought together activists during the election who sent in updates about the voting process using cell phones and the Internet. Their involvement helped identify hotspots such as voting stations that had not opened or were not functioning in accordance with the

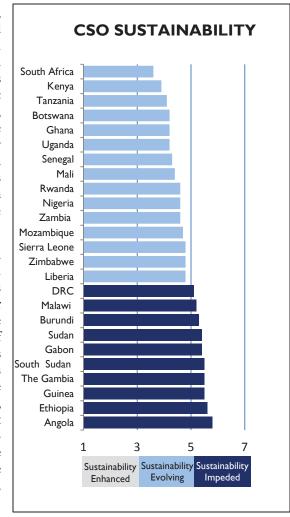
law. In Tanzania, CSOs implemented voter education programs and facilitated the involvement of citizens as candidates for various positions in local government elections.

- The Ebola epidemic. A single case of the Ebola virus reported in Guinea in December 2013 quickly developed into the largest outbreak of the disease in history. As Ebola spread to surrounding countries, Sierra Leone and Liberia were especially hard hit. More than 27,000 cases and 11,000 deaths were recorded in those three countries alone by the time the epidemic subsided in mid-2015. As the disease spread, it quickly overwhelmed local health care capacity. Although the international community was initially slow to recognize the severity of the outbreak, it eventually responded with large infusions of equipment, medication, funding, and personnel. Local CSOs played an important supporting role in the Ebola response. In Liberia, service-providing CSOs served as conduits of information, food, and other necessities to local communities, while in Sierra Leone, advocacy CSOs conducted sensitization, disease detection, and contact-tracing campaigns. In Guinea, community-based rapid intervention groups composed of CSOs and other stakeholders conducted more than 20,000 information sessions and distributed soaps and disinfectants. At the same time, normal CSO operations in these countries were hampered temporarily by the diversion of funding or restrictions on mobility and group activities.
- Economic transition. The lingering effects of the 2007-2008 global economic crisis, coupled with reductions in donor funding and declining oil revenues, contributed to the spread of poverty in many countries. Rwanda and Sudan felt the pinch of international sanctions, while Angola and Nigeria suffered from the contraction of the international oil market. Residents of Ghana and The Gambia were squeezed by a rapid growth in the cost of living, while populations in South Africa, Zimbabwe, and Angola experienced yet another year of economic decline. Liberia, Sierra Leone, and Guinea were devastated by the Ebola crisis, which interrupted business and killed thousands of the workingage population. These and other economic pressures intensified at the same time that many donors continued to downsize their programs in the region. As a result, CSOs in nearly all countries reported dwindling funding for their activities, and many organizations had to cut programming or even close their doors.

The overall sustainability of the majority of CSO sectors in Sub-Saharan Africa fell within the Sustainability Evolving category in 2014. While no country transitioned to a different category of sustainability during the year, seven of the twenty-five countries surveyed reported changes in their overall sustainability scores. On the positive side, the viability of CSO sectors in Ethiopia, Ghana, Mali, and Uganda improved in the face of pervasive economic and political challenges. Ugandan CSOs showed increasing skill at advocacy as they successfully challenged the Anti-Homosexuality Law and launched the Free and Fair Elections campaign. Their financial viability also improved as funding from development partners at the sub-national level increased and some organizations initiated effective revenue-generating activities. In Ghana, advocacy was also particularly strong. CSOs formed a coalition that called on the government to make the process of applying for the International Monetary Fund (IMF) bailout more transparent, and a new type of advocacy group, Occupy Ghana, emerged to carry out protest marches focused on the energy crisis, corruption, public accountability, and the government's management of the economy. In Ethiopia, where the environment for human rights and advocacy CSOs is particularly difficult, parliament amended the so-called 30/70 rule to recategorize some expenses as project costs, thus freeing up funds for core administrative expenses, which cannot amount to more than 30 percent of an organization's overall budget. CSOs perceived this amendment as a positive development. Malian CSOs enjoyed an improved public image thanks to their visibility and constructive contributions during the Algiers negotiations, a process for achieving peace and reconciliation between the government and armed groups in the north of the country.

On the other hand, the CSO sectors in Rwanda, Senegal, and South Sudan experienced a decline in overall sustainability in 2014, largely because of growing political and economic pressures. Rwandan CSOs grappled with constrictions in their operating environment as well as decreased funding and the take-over of some dynamic organizations by pro-government groups. In Senegal, consultations between the government and CSOs on the legal framework broke down and reform of the law governing CSOs continued without CSO involvement. In South Sudan, a brutal civil war led to suppressed freedoms and heavy-handed government interference. Taken together, these developments were enough to damage the overall outlook for CSOs in these countries.

Data about the size of the CSO sectors in Sub-Saharan Africa is incomplete. In many countries, official information about the number of registered entities is unreliable, contradictory, or spotty. In South Africa, for example, the number of voluntary associations is made public by registering authorities, but the number of nonprofit companies and trusts is not. Other governments release data on the number of registered organizations without indicating how many of these organizations are still active. In some countries, such as Sudan, Mozambique, and Sierra Leone, official information about the number of CSOs is simply not available. While nongovernmental entities may seek to estimate the size of the sector, the lack of concrete information makes accurate assessments of the sector's impact difficult and impedes a systematic, holistic approach to its development.



Despite the lack of exact information, South Africa's sector is clearly the largest in Sub-Saharan Africa, with more than 130,000 voluntary organizations registered in 2014. Nigeria also has a very large CSO sector, with 70,000 organizations, while Angola and South Sudan have the smallest CSO sectors, with well below 500 organizations reported in each country. The number of CSOs grew most rapidly during 2014 in South Africa and Liberia, although it is too early to tell whether Liberia's growth was due more to easier registration or increased funding from the Ebola response. South Sudan was the only country that recorded negative growth in 2014, as a result of the intense violence that broke out in that country at the end of 2013.

Legal Environment

In 2014 the legal environment was one of the most dynamic dimensions of CSO sustainability in Sub-Saharan Africa, and also one of its weakest. About half of surveyed countries recorded a change in the legal environment in 2014, with the overwhelming majority of changes negative. Thirteen countries were in the Sustainability Impeded category and four more countries were on its threshold. South Africa, Botswana, and Ghana reported the strongest scores in this dimension, largely thanks to straightforward registration procedures and a relative lack of state interference.

The two issues most frequently raised regarding the legal environment in 2014 were the restructuring of legal frameworks and state-sponsored harassment and intimidation. On the legislative front, some developments were positive. For example, in Guinea, CSOs were better able to acquire and administer certain goods and property, while in Botswana, the Legal Practitioners Act was reformed to allow CSOs to employ their own lawyers to offer legal aid services. However, in a number of countries CSOs experienced a frustrating lack of

ANGOLA



CSO SUSTAINABILITY: 5.8

Country Facts*

Capital: Luanda

Government Type: Republic; Multiparty Presidential Regime

Population: 19,088,106

GDP per capita (PPP): \$7,200

Human
Development Index:

140

Angola² is the most rapidly urbanizing country in southern Africa and experienced the world's highest average annual economic growth between 2001 and 2010, mainly because of revenues from oil and diamonds. In 2014 income distribution remained extremely unequal, and the country produced very little in terms of manufactured goods. The cost of living remained very high, especially in the capital city of Luanda.

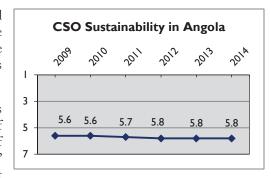
Most international donors have withdrawn from Angola on the grounds that the country has experienced significant

economic gains in recent years and less in need of support. However, the precipitous fall in the price of oil in 2014 had a massive effect on public spending, especially for social development. The government introduced several rounds of budget cuts and spending freezes, with more predicted to follow in 2015. As most active

²Capital, government type, population, and GDP in all reports are drawn from the Central Intelligence Agency, The World Factbook, available online at https://www.cia.gov/library/publications/the-world-factbook/. Human Development Index rankings available at https://hdr.undp.org/en/content/human-development-index-hdi.

donors who support CSOs in Angola are involved in the oil and gas industry, their incomes fell in 2014 and they have withdrawn, seriously reduced, or even canceled their corporate social responsibility (CSR) programs. As a result, many CSOs saw their sources of income disappear.

In 2014 a new policy for the country's administrative divisions was introduced. Among other changes, a new layer of administrators emerged, which delayed the implementation of some activities. In addition, CSO participation in citizens' councils (CACS) was affected, as municipalities were not yet

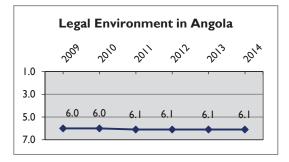


functioning and therefore CACS activities were confined to the district level.

The first countrywide census since 1973 was taken in 2014. The event was successful and indicated the need to revise several previous "guesstimates" about the country's population. The number of inhabitants was found to be 24.3 million rather than 18 to 20 million, which meant that many previous calculations, including poverty indicators, were off by 25 to 30 percent. The census figures have implications for future CSO projects, as they can serve as a basis for improving the effectiveness of interventions.

According to a speech by the Minister of Justice at the 55th ordinary session of the African Commission on Human and Peoples' Rights in April 2014, there are 301 registered CSOs in Angola, including 228 domestic and 73 international organizations. However, this number may not be accurate, as many international organizations have recently withdrawn from Angola and most national CSOs depended on foreign funding. It is estimated that fewer than 10 percent of registered CSOs implemented projects in 2014.

LEGAL ENVIRONMENT: 6.1



The main law governing CSOs in Angola is the Associations Law (14/91), passed in 2012. The law gives significant powers, including the ability to guide local project implementation, audit CSO accounts, and control funding provided by other organizations, to the Technical Unit for the Coordination of Humanitarian Assistance (UTCAH), which is the main body monitoring and supervising CSOs under the Ministry of Social Welfare and Rehabilitation. In 2015 a new NGO law is slated to be introduced and UTCAH will be renamed the Institute of Promotion and

Coordination of Aid Communities (IPROCAC). The new law should further strengthen government control, as IPROCAC will be empowered to more closely coordinate and oversee CSO activities and guide local program implementation in consultation with relevant ministries and provincial governments.

It remains very difficult to register a CSO in Angola. Information about registration procedures is not readily available, it is not clear what documentation is needed, the law is not always followed in practice, and the Ministry of Justice and lawyers handling registrations often interpret the law differently. Moreover, obtaining mandatory documentation with approvals from various government departments can be expensive, especially for smaller organizations. As a result, smaller organizations often work under the umbrella of larger, previously registered CSOs. Three organizations— the Justice, Peace, and Democracy Association (AJPD), Institute for Democracy, and Mosaiko—are halfway through a registration process that is expected to take more than three years. In accordance with the law, their bylaws have been published in the official government gazette, yet the Ministry of Justice has not issued their certificates of incorporation, claiming that it has lost previously submitted documentation or their statutes do not accord with the law. The financial and legal consequences for these organizations are considerable, as they are not eligible for most funding without

proper registration and can be subject to other restrictions, such as a ban on their activities or difficulties in establishing partnerships.

In 2014 there were several instances in which the state sought to limit the activities of CSOs. For example, authorities summoned the Association Building Communities (ACC), an organization that monitors mineral extraction in Lubango, to testify about its activities. In Lunda Norte and Uíge, the Support to Non-State Actors Program (PAANE), an EU-funded project that promotes the participation of non-state actors in governance and the fight against poverty, was prevented by UTCAH from pursuing activities related to decentralization, presumably to avoid conflicts with central state structures. The government's ongoing demolition of informal settlements is perceived as an intimidating display of power and thus as a subtle effort to discourage advocacy actions by CSOs. Public demonstrations are still not easy to organize, and they usually attract police attention and arrests.

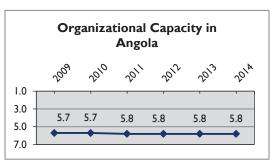
Public procurement law requires that CSOs have public utility status to compete for government contracts. However, the competitive tendering procedure is unclear, and recognition of CSOs' entitlement to compete is not uniform. As a result, CSOs usually find it difficult to obtain government contracts.

CSOs that are registered and send annual reports to UTCAH can legally qualify for tax exemptions on certain items, such as imported goods. But since the process of applying for these exemptions is complex and bureaucratic, some CSOs forego this benefit.

Generally, lawyers in Angola do not work for the CSO sector, and there are only a few lawyers in the country familiar with CSO law.

ORGANIZATIONAL CAPACITY: 5.8

Angolan CSOs continue to have a weak culture of accountability. Most organizations do not try to mobilize constituents beyond their members. While many organizations have mission statements and strategic plans of fairly good quality, the purpose of these tools is usually to fulfill donor requirements rather than guide organizational activities. CSOs sometimes work in fields outside of their stated missions if donors make funding available.

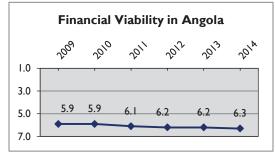


All organizations must have bylaws to register. But in practice these internal regulations often do not function well. For example, general assemblies, ostensibly the highest decision-making bodies within organizations, often do not meet or actively contribute to the organization.

CSOs' financial insecurity often limits their human resource capacity. CSOs struggle to hire and retain competent permanent staff, especially as many donors do not support staff development. Once employees are trained in house, companies in the oil and gas industry often poach them by offering better pay and working conditions.

Studies and mappings conducted by PAANE in the provinces of Uige, Lunda North, and Lunda South have shown that many organizations do not have access to computers, the Internet, and other computer-based technologies. Although the situation is worse in rural areas, it persists even in peri-urban areas of Luanda. In many cases, the use of technology is limited by a lack of electricity. Normally, organizations communicate through meetings and telephone calls.

FINANCIAL VIABILITY: 6.3



In 2014 there were not many large pools of funding available to Angolan CSOs. The country's extremely high cost of living and complicated logistics, especially with imports, induced institutional donors, such as CARE and Oxfam Novib, to end their programs in 2014. Several embassies, including those of the United Kingdom and the Netherlands, experienced a reduction or cancellation of their aid budgets during the year. Locally, many oil and gas companies, the largest domestic source of funding for CSOs, were in crisis

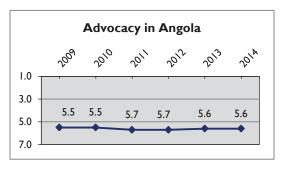
and slashed their CSR programs. As a result, support was scarce, and most funding for CSOs in 2014 was modest, project based, and short term. Community-based organizations (CBOs) found it particularly difficult to obtain funding, and many were unable to implement activities.

Most CSOs in Angola have historically depended on a single donor for funding, but in 2014 they faced the challenge of having to diversify their sources of income because of the country's economic difficulties. Opportunities for co-financing, cost sharing, and revenue generation were negligible to non-existent. Some CSOs, such as Development Workshop (DW), Mosaiko, and AJPD, turned to service delivery, consulting, or publication sales to ensure their financial sustainability. Among the few organizations obtaining government contracts in 2014 were Community Working for Development (OCODE), Young Football Federation of Cazenga (LIDECA), and FOJASSIDA, which obtained contracts to implement projects from the municipal administration of Cazenga, in Luanda.

Financial management capacity is undeveloped at many Angolan CSOs. This lack of capacity causes many organizations to miss out on funding opportunities. Few organizations are able to afford the cost of independent audits. It is uncommon for CSOs to make their financial records available for public inspection.

ADVOCACY: 5.6

In 2014, because there was funding available for humanitarian assistance, many CSOs switched from providing services to monitoring public policies and engaging in dialogue with the government. One instance of CSO-government cooperation was the joint effort of the National Directorate for Water and the organizations Water For All and DW to improve water provision. Some local municipal administrations regularly invite CSOs to take part in CACS—for example, by leading the organization of various platforms. However, in general CSOs find it difficult



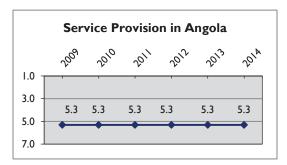
to participate in government decision making, because of a lack of skills and information and because current procedures do not allow for proactive interventions by CSOs.

Overall, CSO advocacy efforts in Angola enjoyed legitimacy and credibility in 2014. CSOs are aware that some fields of intervention are sensitive, and they chose to focus on areas in which they can have an impact, in cooperation with or under the supervision of government structures. OMUNGA, AJPD, Adventist Development and Relief Agency (ADRA), DW, and Mosaiko carried out strong advocacy campaigns on such topics as water and sanitation, human rights, and land tenure during the year. They were able to strengthen their networks, attract media attention, and engage with government administrators. The CSO Education for Everybody organized the Education Network for All and conducted a weeklong event on education. FOJASSIDA held a march for people living with HIV/AIDS. The scientific research center of Junior College

John Paul II, which is part of the private Catholic University of Angola, completed a study on water and sanitation.

Nevertheless, individual organizations can lack appreciation for the importance of advocacy and CSOs' advocacy role. Some organizations seem unaware of the value of CSOs' efforts to push for better living conditions, pro-poor planning and budgeting, adherence to the rule of law, and other public policy issues. This can be especially true of organizations known for their technical expertise in service provision. Organizations such as ADRA and DW in Luanda have begun to offer training in lobbying and advocacy to local organizations, so they can better monitor public policies and budget implementation.

SERVICE PROVISION: 5.3



CSOs provide services in a range of areas, including health and education and, to a lesser extent, governance and economic development. Specific projects include school construction, the provision of educational and hospital supplies, and the delivery of donations to poor communities.

In 2014 CSOs cut back on the provision of basic social services because of reduced donor funding and focused on public policy and advocacy instead. However, many organizations continued to provide services, especially to

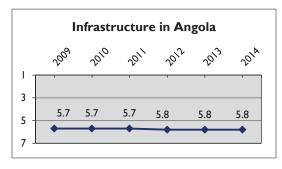
communities that otherwise have trouble accessing government services. For example, CSOs built, maintained, and managed water and sanitation projects and constructed daycare centers and health facilities.

Some CSOs have turned to paid service delivery to generate income and ensure their financial stability. For example, Omunga in Lobito has government contracts to provide care and support to street children. DW conducted studies on water and sanitation for the Angolan National Bank and the Ministry of Urbanism and Housing, and its staff taught at the Angolan Institute for Administrative Training (IFAL) and other schools and universities. The Women Journalists Forum received small grants and contracts to support the 2014 census with training and assistance with the reports.

INFRASTRUCTURE: 5.8

ADRA, Mosaiko, DW, and other organizations run libraries that provide information services for CSOs. DW also provides funding to small organizations in municipalities. In 2014 PAANE provided subsidies valued at about \$1.3 million to organizations in Benguela, Uíge, and Zaire provinces.

Some thematic networks, such as the Land Network, Child Protection Network, Education Network for All, and Luanda Urban Poverty Network (LUPN), continued to



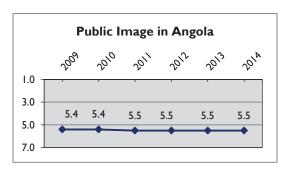
operate in 2014. Among other activities, they supported CACS meetings and urban forums, where citizens, service providers, community and municipal administrators, and other CSOs and civil servants met to talk about solutions for improving living conditions. However, networks of CSOs in Angola have a tendency to run out of steam, usually because they lack funds as well as time to get together. For example, the Forum of Angolan Non-Governmental Organizations (FONGA) and the Committee of International NGOs in Angola (CONGA) are no longer considered active groups.

Many organizations offer capacity-building programs on various topics. For example, in 2014 Platform for Women organized training for journalists on decentralization, and ADRA offered CSOs training in community development. The Center for Development and Partnerships of Angola (CDPA) used to support capacity building for CSOs but this organization has now disappeared.

Some organizations, including DW, conducted provincial conferences of CSOs in 2014 to promote CSO interests, expand their networks, and formulate shared positions on poverty alleviation, access to basic services, and other topics.

The government and CSOs sometimes partner on projects of mutual interest. For example, in 2014 the Ministry of Justice and Human Rights supported the attendance of several CSO representatives at a training on human rights in Norway. There is some contact with business, although cooperation slowed in 2014 because of the economic crisis. In a joint activity involving business, CSOs, and the government, ADRA worked with the Agricultural Credit Program operated by the Commerce and Industry Bank, Women Platform for Action, and the Ministry of Family and Women Promotion on gender equity issues.

PUBLIC IMAGE: 5.5



CSOs benefited from more coverage by private media than state media in 2014. Although CSOs make an effort to invite media to cover events, private media are more likely to attend. State media usually ignore CSO events if no public authorities are present.

The public perceives CSOs positively. The government's attitude towards CSO capabilities can also be positive, judging from its reliance on many organizations for information about topics of shared concern. For example, in 2014 the administrator of the National Council of Children

contacted local CSOs to prepare for a trip to Cazenga municipality because they had better information than government offices. Although the government seems to value CSOs more as service providers than as agents for empowering communities, it has expressed appreciation of CSOs' role in monitoring public policy. For example, in a speech about African human rights, the minister of justice and human rights cited Angolan organizations that have supported this cause. The government is less tolerant of unorganized civil society, such as mass demonstrations, which sometimes elicit large-scale police attention.

DW, ADRA, and Mosaiko regularly publish their annual reports on their websites and send them to interested partners and donors. ADRA and some other organizations have clear regulations about what each member of the organization may or may not post, publish, and disseminate in their annual reports and elsewhere. Individual organizations sometimes have written codes of conduct on social media use by staff.

