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ZIMBABWE E-HAILING ASSOCIATION

Self-Regulation Position Paper

A Sector Ready to Be Regulated: Voluntary Standards for Safety,
Accountability and Revenue Ahead of Formal Regulation
Presented to the Office of the President and Cabinet
and Sector Stakeholders



1. Executive Summary

E-hailing is no longer an experiment in Zimbabwe. It is how a growing share of urban Zimbabweans move, how thousands of drivers earn, and how capital, technology and employment are entering the transport sector. The law has not kept pace. The Road Motor Transportation Act [Chapter 13:15] licenses vehicles and routes. It does not contemplate a digital platform that matches a willing passenger to a vetted driver. The result is a contradiction the State itself has recognised: the fiscus already collects revenue from platform-based transport services, while municipal enforcement arrests and fines the drivers who generate that revenue. The sector is taxed, demanded and unlicensed at the same time.

At the stakeholders consultative meeting convened by the Office of the President and Cabinet in August 2026, Government articulated a clear position: it will not impede emerging sectors and economic growth. The Ministry of Transport and Infrastructural Development confirmed that work was underway to close the legal gap. The City of Harare indicated it would implement clear national guidance. ZIMRA, VID and CVR offered practical support. Operators were asked to organise the industry and present workable self-regulation proposals.

This paper is that position. It is not a request for leniency. It is an offer of order.

The Zimbabwe E-Hailing Association (ZEHA) is the industry body being constituted by e-hailing and platform-mobility operators. Members commit now to published operator criteria, a uniform Driver Verification Standard, ZEHA IDs, provincial operating zones and controlled intercity endorsements, vehicle and insurance standards, in-app safety, a Shared Safety Registry, data protection, correct tax cooperation, transparent fares, driver welfare, an independent Ombudsman and monthly aggregate reporting to Government.

In return, the Association asks government for five things: recognition of ZEHA as the sector counterpart, including a seat in consultations and at the drafting table; an interim administrative directive that pauses arrests and impoundments of drivers registered under ZEHA-compliant platforms while the legal instrument is finalised; dedicated e-hailing licence classes in that instrument; a one-stop licensing window with proportionate fees; and a six-to-twelve-month transition period for existing drivers to regularise.

Every commitment is verifiable. Members sign the Code, submit to an independent Compliance Committee and accept published sanctions. The Founding President and Board lead strategy but cannot influence compliance, appeal or Ombudsman outcomes. Self-regulation is a bridge to law, not a substitute for it.

Government wants revenue, safety, order and formalisation. So do we. This paper shows how both sides get all four, starting now.

2. Background and Mandate

In August 2026 the Office of the President and Cabinet convened a stakeholders consultative meeting on the ease of doing business for the e-hailing sector. Participants included the OPC, relevant ministries and agencies, local authorities, residents'

representatives and e-hailing operators. The discussion identified the need for an organised industry counterpart and a practical bridge between current operations and a dedicated legal framework.

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The meeting recorded specific commitments. The City of Harare acknowledged the legal gap and committed to comply the moment a directive cures it. The Ministry of Transport confirmed that work is underway to close the lacuna. ZIMRA offered to educate operators and drivers on their tax obligations. VID offered group defensive driving training, certification, and a more convenient vehicle fitness testing approach. CVR offered support with vehicle licence verification.

At the close of the meeting, operators were asked to bring the industry together and present a self-regulation position paper to the OPC and stakeholders. This document discharges that mandate. It has three purposes:

1. To constitute and describe the Zimbabwe E-hailing Association, its membership categories and the requirements for each.
2. To set out the ZEHA Self-Regulation Code: the binding standards members adopt now, ahead of formal regulation.
3. To state precisely what the sector asks of government, and what each stakeholder gains from engaging with ZEHA as the industry counterpart.

3. The Sector Today: Taxed, Demanded, Unlicensed

3.1 The legal gap

The Road Motor Transportation Act [Chapter 13:15] provides for road-service and taxi licensing, including metered and unmetered taxi operations, but it does not yet create a dedicated, technology-specific e-hailing class that clearly allocates obligations among the platform, driver and vehicle. The result is regulatory uncertainty and inconsistent enforcement against a sector whose trips and participants are capable of being digitally identified and supervised.

3.2 The fiscal contradiction

The State already earns revenue from the digital economy. From 1 January 2026, VAT Act section 13A expressly includes platform-based transport hailing supplied by non-resident electronic-service suppliers, with ZIMRA guidance governing registration, withholding, returns, payment and fiscal invoicing. Local suppliers remain subject to the

ordinary tax rules applicable to them. Formalisation should improve correct collection without treating every platform, supplier or driver as though the same tax mechanism automatically applies. PAGE 3 OF 23

3.3 The demand reality

Urban Zimbabweans have voted with their phones. E-hailing offers upfront pricing, identified drivers, traceable trips and cashless options that informal alternatives cannot match. The City of Harare's own planning officials have acknowledged publicly that the scale of e-hailing activity now requires regularisation. Suppressing the sector will not restore the status quo; it will push demand into fully informal, fully untraceable transport, the opposite of every stakeholder's objective.

3.4 The regional direction of travel

Zimbabwe is not the first country to face this question, and the answers are on record. Kenya gazetted the Transport Network Companies, Owners, Drivers and Passengers Regulations in 2022, creating an annual licensing regime for platforms that requires local corporate registration, registration with the Data Commissioner, tax compliance, panic buttons connected to a manned response centre, pre-trip disclosure of the driver's identity and the estimated fare, receipts, and a published driver deactivation policy. South Africa amended the National Land Transport Act to recognise e-hailing as its own service type with its own operating licence, and holds the platforms themselves accountable, with fines of up to R100,000 for an application that allows an unlicensed operator onto the road. Annexure C summarises both regimes. ZEHA's position is simple: Zimbabwe can adopt the best of these frameworks, avoid their mistakes, and the industry will begin complying with the substance of them voluntarily, immediately, without waiting for gazetting.

4. Guiding Principles

Six principles govern this paper and the Association's conduct:

1. **Safety first.** The passenger's safety, the driver's safety and the public's safety outrank every commercial consideration.
2. **Formalisation over suppression.** The objective is to bring an existing sector into the light, not to shrink it. Rules should be achievable by the drivers and operators expected to follow them.

3. **Revenue through visibility.** Every platform trip is a recorded transaction. Formalisation does not require new taxes. It requires collection points, and the platform is the collection point.
4. **Local value retention.** Operators serving Zimbabwean passengers should be incorporated, banked, taxed and data-accountable in Zimbabwe.
5. **Proportionality.** Fees, paperwork and compliance burdens must be scaled so that an individual driver earning in this economy can afford to be legal. Unaffordable compliance manufactures the informality it claims to cure.
6. **Verifiability.** Every commitment in this paper is auditable. Self-regulation without enforcement is public relations. ZEHA's Code carries an independent compliance committee and a sanctions ladder.

5. The Association: Structure, Membership Categories and Requirements

5.1 Name, status and objects

The Zimbabwe E-hailing Association (ZEHA) is a voluntary, non-profit industry association constituted by its members under a written constitution, facilitated in its formation by the . Its objects are to promote, standardise and self-regulate app-based passenger transport, delivery and logistics, platform payments, and related on-demand digital services in Zimbabwe; to represent the sector in engagements with government and regulators; and to protect passengers, drivers and the public through enforceable industry standards.

The Association is operator-funded through membership subscriptions prescribed per category in the First Schedule to its constitution. It accepts no funding that would compromise its independence.

ZEHA's Constitution establishes a Founding President and Executive Chairperson for a five-year protected term, a representative nine-seat Executive Board, and a continuing Founder and Patron role for core institutional matters. It also recognises Founding General Counsel and Board Secretary as a guaranteed non-voting Board adviser. Entrenched founder stewardship protects continuity of mandate, identity and government relationships, while express recusal and non-interference rules protect discipline, appeals, audits, Registry decisions and the Ombudsman from governance influence.

5.2 Membership categories and requirements

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ZEHA registers the players in the sector in four categories. Registration is against published, objective criteria, and the register of members in Categories A and B is public. The requirements below are conditions of admission and continuing conditions of membership. Failure to maintain them triggers the enforcement process in Section 6.12.

CATEGORY A: PLATFORM OPERATORS

Companies that operate a digital platform matching passengers or customers to drivers or couriers in Zimbabwe. Full voting members. Requirements:

- Incorporation in Zimbabwe, or registration as an external company under the Companies and Other Business Entities Act [Chapter 24:31] with a resident responsible officer.
- Registration with ZIMRA for all applicable tax heads, and a valid tax clearance certificate at admission and at each annual renewal.
- A data controller licence from POTRAZ under the Cyber and Data Protection Act [Chapter 12:07] and SI 155 of 2024, and a certified Data Protection Officer notified to POTRAZ (Section 6.6).
- A settlement account with a Zimbabwean registered bank through which local platform revenues are processed.
- Adoption of the ZEHA Driver Verification Standard (Section 6.2 and Annexure A) for every driver on the platform.
- Passenger liability insurance arrangements meeting the minimums in Section 6.3, whether platform-procured or verified at driver level.
- The in-app passenger safety features in Section 6.4, including SOS, trip sharing and pre-trip driver identity disclosure.
- A published driver deactivation policy with due process, and a published passenger complaints procedure with the service levels in Section 6.8.
- Participation in the Shared Safety Registry (Section 6.5) and monthly aggregate reporting (Section 6.11).
- A signed copy of the ZEHA Code of Conduct executed by a director.

CATEGORY B: FLEET PARTNERS AND VEHICLE OWNERS

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Companies or individuals who own or manage vehicles operated on member platforms by employed or contracted drivers. Non-voting corporate members with a seat on the Standards Committee. Requirements:

- Business registration, or national identity documentation for individual owners, and ZIMRA registration where thresholds apply.
- Every vehicle registered with the Central Vehicle Registry, with a current certificate of fitness and current ZINARA licensing.
- Insurance for every vehicle meeting the minimums in Section 6.3.
- Written agreements with drivers that reflect the driver welfare minimums in Section 6.9.
- A signed copy of the ZEHA Code of Conduct.

CATEGORY C: DRIVER-PARTNERS

Individual drivers and couriers operating on member platforms. Affiliated through their platform's compliance with the Driver Verification Standard, with the option of direct individual affiliation and representation through a Drivers Council within the Association. Requirements (verified by the platform at onboarding and maintained thereafter):

- Verified national identity with a live facial match at onboarding and periodic in-app re-verification.
- A valid driver's licence of the appropriate class, held for a minimum period prescribed in the Code.
- A Defensive Driving Certificate, obtainable through the VID group training sessions offered at the OPC consultative meeting.
- A police clearance certificate from the ZRP, current at onboarding and renewed on the cycle prescribed in the Code.
- A ZIMRA Taxpayer Identification Number (TIN) in the driver's own name, so the driver is visible to the fiscus for their own obligations.
- Medical fitness certification where required for the class of licence.
- A vehicle meeting the standards in Section 6.3 where the driver is an owner-driver.

- No unresolved listing on the Shared Safety Registry, and written acceptance of the Driver Code of Conduct.

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CATEGORY D: ASSOCIATE MEMBERS

Insurers, banks and financiers, training providers, technology vendors, academic institutions and driver representative bodies with a legitimate interest in the sector. Non-voting. Requirements: proof of registration in their own sector, a declared interest statement, and a signed Code of Conduct. Associate members may serve on technical committees but hold no vote on Association positions, preserving the operator-led character of the body.

5.3 Why registration matters to stakeholders

The register converts an anonymous sector into an accountable one. A council officer, a police officer, an insurer or a passenger can establish within seconds whether a platform is a registered Category A member in good standing. Government gains a single, current, public list of who is operating; the public gains a mark that separates compliant operators from free riders; and compliant operators gain the commercial value of that separation. Section 6.13 extends the same principle from the platform to the individual driver through the ZEHA ID.

6. The ZEHA Self-Regulation Code: What Members Begin Doing Now

This section is the heart of the paper. Each commitment below takes effect for founding members upon signature of the Code, ahead of and without waiting for formal regulation. Where a commitment references a government agency, ZEHA will approach that agency to operationalise the cooperation offered at the OPC consultative meeting.

6.1 Registration of operators and a public register

ZEHA will maintain and publish a register of Category A and Category B members, showing corporate identity, responsible officers, tax registration status, data controller licence status, insurance arrangements and compliance standing. The register will be available to the OPC, the Ministry of Transport, local authorities, the ZRP and the public. New entrants will be admitted against the criteria in Section 5.2 within a defined turnaround, so that registration is a gateway, never a barrier to legitimate competition.

6.2 The ZEHA Driver Verification Standard

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Every member platform applies a uniform, auditable verification standard to every driver before activation and on a continuing basis. The full standard appears in Annexure A. Its pillars:

- **Identity.** National ID or passport verified against a live facial match at onboarding, with periodic randomised in-app re-verification to defeat account sharing.
- **Competence.** Valid driver's licence of the appropriate class held for the prescribed minimum period, plus a Defensive Driving Certificate through the VID group sessions.
- **Character.** A current ZRP police clearance certificate at onboarding, renewed on a fixed cycle, and screening against the Shared Safety Registry.
- **Vehicle.** CVR registration verification, current certificate of fitness, current ZINARA licensing and verified insurance before the vehicle carries its first passenger.
- **Continuing conduct.** Ratings monitoring, incident review, and re-verification triggers on complaints or anomalies.

Members commit to make their driver verification records available for audit by the ZEHA compliance committee, and to law enforcement upon lawful request, in the format prescribed in the Code.

6.3 Vehicle and insurance standards

Minimum vehicle standards for member platforms: current CVR registration in the name of the declared owner; a valid certificate of fitness renewed on the statutory cycle, using the more convenient group testing approach offered by VID; current ZINARA licensing; and insurance that includes passenger liability cover appropriate to fare-carrying use, not merely private third-party cover. ZEHA will negotiate group insurance facilities with its Category D insurance members so that compliant cover is affordable at driver level, and will publish the minimum benefit schedule.

6.4 Passenger safety features

Every member platform provides, as a condition of membership: pre-trip disclosure to the passenger of the driver's name and photograph, the vehicle make, model and registration number, and the estimated fare; an in-app SOS function; live trip sharing with a contact of the passenger's choice; two-way ratings; and an incident reporting channel. ZEHA will establish a shared incident response line for member platforms,

staffed during operating hours and migrating to twenty-four hour coverage as membership funds allow, so that even the smallest member offers passengers a manned escalation path. These features mirror the requirements Kenya imposed by regulation in 2022. ZEHA members adopt them by contract now.

6.5 The Shared Safety Registry

The single greatest safety weakness of a multi-platform market is churn: a driver deregistered by one platform for assault, theft or dangerous driving simply onboards with a competitor. ZEHA closes this gap. Members will operate a Shared Safety Registry recording deregistrations for defined serious misconduct categories. Every member checks the Registry before activating a driver and reports qualifying deregistrations to it. The Registry operates with due process: written notification to the driver, a right to be heard before the ZEHA compliance committee, defined listing periods proportionate to the conduct, and a rehabilitation pathway. Registry data is processed in full compliance with the Cyber and Data Protection Act, with POTRAZ consulted on the Registry's design before launch. No equivalent exists anywhere in the current legal framework. It is the clearest example of self-regulation delivering protection the statute book does not yet provide.

6.6 Data protection: licensed controllers and certified DPOs

E-hailing platforms process precisely the categories of personal data the Cyber and Data Protection Act [Chapter 12:07] exists to protect: identity documents, biometric facial data, live location, travel patterns and payment information. ZEHA therefore makes full data protection compliance a condition of membership, not an aspiration. Every Category A member must:

- Hold a current data controller licence from POTRAZ under SI 155 of 2024, applied for on Form DP1 and renewed within the prescribed renewal window.
- Appoint a qualified Data Protection Officer, certified through the POTRAZ-approved certification programme, and notify the appointment to POTRAZ on Form DP2. The DPO's identity and contact channel must be published to users.
- Maintain a breach response protocol that reports qualifying breaches to POTRAZ within twenty-four hours of awareness and notifies affected data subjects within seventy-two hours where the breach poses high risk, as SI 155 requires.
- Conduct data protection impact assessments for new processing of biometric or location data, apply privacy by design in product development, and process children's data only with verified guardian consent.

- Commit to hosting or mirroring the personal data of Zimbabwean users within Zimbabwe, or under arrangements approved by POTRAZ, so that the data of Zimbabwean citizens remains under Zimbabwean jurisdiction.

ZEHA will run an annual joint compliance workshop with POTRAZ for members and their DPOs, and the compliance committee will treat lapsed data controller licences as an automatic suspension event.

6.7 Tax and fiscal cooperation

ZEHA's members accept a simple proposition: the platform is the State's cheapest and most accurate collection point for this sector. Members commit to:

- Maintain the taxes applicable to their own operations. Non-resident electronic-service suppliers comply with VAT Act section 13A and applicable digital-services withholding rules; local suppliers comply with their ordinary applicable tax heads.
- Host joint ZIMRA education workshops for drivers on presumptive tax and personal obligations, operationalising the offer ZIMRA made at the OPC meeting, with materials co-branded and distributed in-app.
- Pilot driver-level presumptive or per-trip withholding only under a written ZIMRA and Treasury framework identifying legal basis, rate, taxpayer credit, remittance deadline and correction process.
- Stand ready to pilot integration with ZIMRA's Fiscalisation Data Management System so that platform receipts double as fiscal receipts.
- Include aggregate gross trip value, tax-compliance indicators and taxes or withholding remitted in the monthly Government dashboard and publish an annual sector-transparency report.

Foreign-owned platforms are welcome in ZEHA on identical terms. What the Association will not defend is any operator, local or foreign, extracting commissions from Zimbabwean trips while contributing nothing to the fiscus that hosts them.

6.8 Fare transparency and consumer protection

Consistent with the Consumer Protection Act [Chapter 14:44], every platform provides upfront fare disclosure, a receipt, a refunds policy, and a complaints procedure that acknowledges within forty-eight hours and resolves or escalates within fourteen days. The ZEHA Ombudsman then offers conciliation and a reasoned outcome within twenty-one days where practicable, supporting section 6 of the Act. The pathway does not

exclude rights under sections 33 and 65 to approach the Consumer Protection Commission, a designated organisation or the courts. There is no retaliation, and safety emergencies go immediately to emergency services or law enforcement.

6.9 Driver welfare minimums

The sector's licence to operate depends on the people who drive it. Members commit to: personal accident cover for drivers while on trip, procured at platform or group level; deactivation only for cause, with written reasons, a right of reply and an appeal to the ZEHA compliance committee; transparent earnings statements showing gross fare, commission and net; commission rates published to drivers in advance and never varied retroactively; and cooperation with NSSA on a practical pathway for voluntary social security registration of gig drivers. ZEHA will constitute a Drivers Council so that Category C voices are inside the Association's governance, not outside its gates.

6.10 The ZEHA Ombudsman

ZEHA will appoint an independent Ombudsman with a legal or consumer-protection background. The Ombudsman first attempts conciliation, may issue a reasoned determination binding on members within the published contractual threshold, and aims to close ordinary matters within twenty-one days of a complete file. The service is free, outcomes are summarised anonymously each month, and statutory consumer rights remain fully available.

6.11 Reporting and data sharing with government

ZEHA will deliver to the OPC, Ministry of Transport and participating public authorities a monthly aggregate dashboard by the tenth business day of the following month. It covers registrations by primary provincial zone and intercity status, trips and gross trip value, tax-compliance and aggregate-remittance indicators, incidents, complaints and resolution, compliance action, verified vehicles and aggregate driver-welfare indicators. Material errors are corrected promptly. No passenger identity, individual route or unnecessary personal data is disclosed. The dashboard complements, and does not replace, statutory returns.

6.12 Enforcement: making the Code bind

The Code is enforced by a ZEHA compliance committee of three: an independent chairperson who is a legal practitioner, one member elected by Category A, and one drawn from Category D or the Drivers Council. The sanctions ladder: written warning; remediation plan with deadlines; financial penalty prescribed in the Code; suspension

from the register, with the suspension published; and expulsion, published, with notification to the OPC and the Ministry of Transport. An annual compliance audit certifies each member's standing, and only members in good standing may display the ZEHA Registered mark. Members submit to this jurisdiction by contract at admission. The Association polices its own so that the State does not have to police everyone.

6.13 The ZEHA ID and the Stakeholder Verification Dashboard

One credential, one point of truth. Verification only protects a driver if it can be seen at the roadside. ZEHA therefore consolidates the outputs of the Driver Verification Standard into a single credential: every driver who completes the Standard is issued a ZEHA ID, a unique registration number carried as a card and a digital credential. Every registered operator receives a ZEHA operator registration number and appears on the public register under Section 6.1. A driver's ZEHA ID is issued only on proof of the complete compliance file:

- **Identity, verified with the police.** National ID or passport confirmed by live facial match, and a current ZRP police clearance certificate.
- **Competence.** A valid driver's licence of the appropriate class, tracked to expiry.
- **Tax registration.** A ZIMRA Taxpayer Identification Number (TIN) in the driver's own name, so that every ZEHA ID holder is visible to the fiscus, on platforms that must themselves hold current tax clearance as a condition of membership.
- **Platform particulars.** The platform or platforms on which the driver operates, declared at issuance and kept current as a condition of the ID.
- **Full KYC.** The complete Annexure A file: vehicle registration, certificate of fitness, ZINARA licensing, insurance, Shared Safety Registry screening and the signed Driver Code of Conduct.

The Stakeholder Verification Dashboard. ZEHA will build and operate a secure online dashboard, availed to all stakeholders: the OPC, the Ministry of Transport, the ZRP and the Ministry of Home Affairs, local authorities, VID, ZIMRA, POTRAZ, insurers and member platforms, each through protected access. Entering a ZEHA ID returns the holder's standing in seconds: current, suspended, lapsed or not found, together with membership category, declared platform(s) and the validity dates of the underlying documents. The dashboard discloses the minimum necessary for the enquiry, logs every lookup, and is designed and operated in full compliance with the Cyber and Data Protection Act [Chapter 12:07].

What this means at the roadside. When any enforcement action or moratorium is in force, the officer conducting it needs one number to distinguish a verified driver from an unknown one. A current ZEHA ID answers in seconds what no roadblock can: this driver is identified, police-cleared, licensed, insured, tax-registered and current. The interim directive requested in Section 8 becomes administrable the day the dashboard goes live: drivers holding a current ZEHA ID are spared, and enforcement concentrates where it belongs, on the unregistered.

Registration funds the scheme. The ZEHA ID is issued against a registration fee with an annual renewal, and operators register against an annual fee, prescribed in the First Schedule. Indicative levels, subject to verification and member resolution: USD 10 for driver ID issuance and USD 20 annual renewal; USD 500 per annum for Category A platform operators; USD 100 per annum for Category B fleet partners. These fees are the Association's independent funding base: they finance the secretariat, the dashboard, the Shared Safety Registry and the verification infrastructure, with audited accounts published annually. For the driver, the proposition is plain: the price of a few trips a year buys the credential that keeps them on the road when enforcement comes.

6.14 Provincial operating zones and intercity endorsements

Every driver selects one primary operating zone corresponding to one of Zimbabwe's ten provinces: Bulawayo Metropolitan, Harare Metropolitan, Manicaland, Mashonaland Central, Mashonaland East, Mashonaland West, Masvingo, Matabeleland North, Matabeleland South and Midlands. The zone is an administrative and reporting base, not a market allocation, and does not prevent a cross-boundary passenger drop-off.

A supplementary intercity endorsement permits a primary-zone driver to accept pre-booked inter-province trips. Exclusive intercity registration requires a home province for administration and permits only pre-booked intercity trips and necessary first/last legs, not unrelated local work. Platforms display, enforce and report the status monthly. Design is completed in days 1–30, piloted in days 31–60, operational in all ten provinces by day 90 and integrated into the statutory window within six to twelve months.

7. What Each Stakeholder Gains

Self-regulation only holds if every stakeholder is better off inside the framework than outside it. The table below states each stakeholder's core expectation and the specific ZEHA mechanism that answers it.

STAKEHOLDER	WHAT THEY NEED	WHAT ZEHA DELIVERS
Office of the President and Cabinet	A whole of government solution; an organised counterpart; proof the ease of doing business agenda works	One accountable industry body, a signed enforceable Code, and monthly evidence of formalisation in progress
Ministry of Transport	A workable licensing model and industry input while the instrument is drafted	Regional benchmarks digested, a licence-class proposal, and a sector already complying with the standard the law will set
Ministry of Finance and ZIMRA	Revenue visibility and low-cost collection from a formalising sector	Member tax compliance as a membership condition, driver tax education, withholding and FDMS pilots, an annual remittance transparency report, and a ZIMRA TIN as a condition of every driver's ZEHA ID
Ministry of Local Government and City of Harare	Order on the roads, regularised operators, an end to enforcement by ambush	A public register any council officer can check, rank and pick-up protocols negotiated city by city, and a counterpart to sign them with
Ministry of Home Affairs and ZRP	Traceability, vetted drivers, cooperation in investigations	Police clearance in the Driver Verification Standard, the Shared Safety Registry, trip records available on lawful request, and the ZEHA ID checked in seconds on the Stakeholder Verification Dashboard
VID	Roadworthy vehicles and competent drivers at scale	Certificate of fitness as a verification gate, uptake of group defensive driving training and the group fitness testing approach
CVR	Accurate vehicle records in commercial use	CVR verification of every platform vehicle at onboarding, using the assistance offered at the OPC meeting

STAKEHOLDER	WHAT THEY NEED	WHAT ZEHA DELIVERS
POTRAZ	Licensed data controllers, certified DPOs, lawful processing of sensitive data	Data controller licensing and DPO certification as membership conditions, breach protocols, an annual joint compliance workshop
Insurers and financiers	An insurable, bankable, data-rich sector	Verified drivers and vehicles, group insurance schemes, and formal earnings records that make drivers creditworthy
Residents and passengers	Safe, identifiable, fairly priced transport with recourse when things go wrong	Verified drivers, SOS and trip sharing, upfront fares, receipts, a complaints SLA and a free Ombudsman
Drivers	The right to earn legally, fair treatment by platforms, a path to formality	An end to arrests as the ask of government, a ZEHA ID that marks its holder verified when enforcement comes, deactivation due process, accident cover, transparent earnings and a Drivers Council

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8. What We Ask of Government

The Association's requests are targeted, measurable and paired with delivery dates. The vehicle proposal is a deliberate fiscal-policy request with safeguards; the remaining measures principally require administrative and legislative coordination:

- 1. Recognition.** Within 30 days, recognise ZEHA as the organised sector counterpart, designate Government contacts and approve the monthly reporting template.
- 2. An interim directive.** Within 14 days, issue administrative guidance on the treatment of verified drivers operating on ZEHA-registered platforms, without displacing lawful enforcement or statutory licensing powers.
- 3. Dedicated licence classes.** Publish a draft within 6 months and gazette within 12 months: a platform-operator licence and simplified e-hailing driver permission with platform accountability.

4. **A one-stop window with proportionate fees.** Prototype within 6 months and go live within 12 months, consolidating approvals with published turnaround times and proportionate fees.
5. **A transition period.** Allow 6 to 12 months from gazetting for existing operators and drivers to regularise, with progress measured monthly and safety-critical requirements effective from day one.
6. **A 1,000-vehicle roadworthiness and ownership facility.** Design within 60 days, open applications by day 90, place the first tranche by month 6 and complete all 1,000 vehicles within 12 months. Establish a targeted customs-duty suspension for fit-for-purpose vehicles financed by a local bank to verified drivers on rent-to-buy. ZEHA verifies eligibility but is not lender or seller. Specifications, insurance, maintenance, transparent allocation across all zones, no premature resale or export, and periodic bank, ZIMRA and transport-authority audit protect safety and the fiscus.

9. Implementation Roadmap

Credibility is a schedule. ZEHA commits to the following timetable from the date founding members sign the Code:

PHASE	ZEHA COMMITMENTS
Days 1 to 30	Adopt Draft 1.3 of the ZEHA Constitution and Code; record the founder and counsel appointments; constitute the interim Board; open the member and provincial-zone registers; agree the monthly reporting template. Open the member register; founding Category A members sign the Code and submit compliance packs. Adopt the delegation, conflicts and related-party policies; obtain independent advice on legal form and filings. Deliver this paper to the OPC and stakeholders; request the interim directive.
Days 31 to 60	Roll out the Driver Verification Standard across member platforms; schedule the first VID group defensive driving and group fitness testing sessions. Hold the first joint ZIMRA driver tax education workshops; agree the design of the withholding and FDMS pilots. Consult POTRAZ on the Shared Safety Registry design; sign the inter-member Registry agreement.
Days 61 to 90	Launch the Shared Safety Registry and the shared incident response line; issue the first ZEHA IDs and open the Stakeholder Verification Dashboard to government, law enforcement and stakeholders. Appoint the Ombudsman and the compliance committee; publish the complaints SLA. Deliver the first full monthly Government dashboard; open applications for the 1,000-vehicle facility.
Days 91 to 180	Complete the first annual compliance audit cycle; issue the ZEHA Registered mark to members in good standing. Submit consolidated drafting input to the Ministry of Transport. Publish the first sector transparency report; convene the first annual general meeting and elect the non-reserved Board seats, without disturbing the Protected Founder Term or reserved offices.

10. Governance, Funding and Accountability of ZEHA

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ZEHA is governed by its Constitution: the Founding President and Executive Chairperson provides protected founder stewardship for the first five years and thereafter continues as Founder and Patron for core institutional matters; a representative Executive Board carries collective fiduciary responsibility; Category A members elect operator seats; the Drivers Council and Categories B and D hold formal representation; an independent finance or governance director strengthens oversight; and Founding General Counsel and Board Secretary hold guaranteed non-voting advisory seats. The Founding General Counsel appointment is subject to disinterested fee approval, strict conflict recusals and separate independent counsel for discipline, appeals and disputes involving the firm.

Funding is by transparent membership subscriptions prescribed per category, together with ZEHA ID issuance and renewal fees and operator registration fees, at indicative levels subject to verification; all are published annually with audited accounts. Related-party transactions require disclosure and approval by disinterested Board members. The Association maintains a clear separation between governance and enforcement: neither the founder offices, the Board nor retained counsel may direct the Compliance Committee, Appeal Panels, Shared Safety Registry determinations or Ombudsman.

The Constitution provides for name and scope evolution through member approval and Founder Reserved Approval, so the Association can grow with the sector while its mandate, identity, non-profit character, intellectual property and institutional relationships cannot be transferred or rewritten without the founder stewardship safeguards. ZEHA remains subject to Zimbabwean law and will obtain independent advice on its final registration form before adoption.

11. Conclusion

The stakeholders consultative meeting at the Office of the President and Cabinet demonstrated something rare: every arm of government, one table, one problem, and a shared conclusion that the gap in the law must be cured. This paper is the industry's side of that bargain. The operators of Zimbabwe's e-hailing sector are not asking to be left alone. They are asking to be counted, verified, taxed, audited and held to a published standard, starting immediately, by their own hand, under their own Association, until the day the law takes over.

Government wants safety on the roads, revenue in the fiscus, order in the cities and growth in an emerging sector. The members of ZEHA want exactly the same four things, because their businesses do not survive without them. Between a sector willing to regulate itself and a government determined not to be the impediment, the remaining distance is short. This paper is offered to close it.

Regulate us. We are ready. Until then, we will regulate ourselves.

Presented for and on behalf of the founding members of the Zimbabwe E-hailing Association.

Founding President and Executive Chairperson, Zimbabwe E-hailing Association

Harare, August 2026

Founding member signatures are appended in the Signature Schedule upon adoption of the Code.

Annexure A: The ZEHA Driver Verification Standard

Applied by every Category A member to every driver, before activation and continuously thereafter.

VERIFICATION ELEMENT	STANDARD
Identity	National ID or valid passport captured and verified. Live facial match against the identity document at onboarding. Randomised periodic in-app selfie re-verification; mismatch suspends the account pending review.
Driver's licence	Valid licence of the class appropriate to the vehicle. Held for not less than the minimum period prescribed in the Code. Expiry tracked in-platform; expired licence auto-suspends.
Defensive driving	Defensive Driving Certificate through VID group training sessions. Existing drivers to complete within the transition window prescribed in the Code.
Police clearance	ZRP police clearance certificate current at onboarding. Renewed on the fixed cycle prescribed in the Code. Defined disqualifying convictions listed in the Code, with proportionality and rehabilitation provisions.
Tax registration	ZIMRA Taxpayer Identification Number (TIN) held in the driver's own name, captured at onboarding and shown on the driver's ZEHA ID record.
Medical fitness	Medical certification where required for the licence class, tracked to expiry.
Vehicle	CVR registration verified against the declared owner. Current certificate of fitness and current ZINARA licensing. Passenger liability insurance verified before first trip and tracked to expiry.
Safety Registry check	Shared Safety Registry queried before activation; an unresolved listing blocks onboarding pending the due process outcome.
Conduct and records	Signed Driver Code of Conduct before activation. Ratings and complaints monitored; defined triggers prompt re-verification or review. Verification records retained per the Code and available to the compliance committee, and to law enforcement on lawful request.

Annexure B: Membership Categories

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CATEGORY	WHO	CORE ADMISSION REQUIREMENTS	RIGHTS
A: Platform Operators	Companies operating e-hailing, delivery or platform mobility applications in Zimbabwe	Zimbabwe incorporation or registered external company with resident responsible officer; ZIMRA registration and current tax clearance; POTRAZ data controller licence and certified DPO; Local bank settlement account; Driver Verification Standard, safety features, insurance minimums, deactivation policy, complaints SLA; Signed Code; Registry and reporting participation	Full voting membership
B: Fleet Partners and Vehicle Owners	Owners or managers of vehicles operated on member platforms	Business registration or verified individual identity; CVR registration, certificate of fitness, ZINARA licensing and insurance for every vehicle; Written driver agreements meeting welfare minimums; Signed Code	Non-voting; Standards Committee seat
C: Driver-Partners	Individual drivers and couriers on member platforms	Full Driver Verification Standard (Annexure A); Signed Driver Code of Conduct; No unresolved Safety Registry listing	Drivers Council seat

CATEGORY	WHO	CORE ADMISSION REQUIREMENTS	RIGHTS
D: Associate Members	Insurers, banks, financiers, trainers, technology vendors, academia, driver bodies	Proof of registration in own sector; Declared interest statement; Signed Code	Non-voting; technical committees

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Subscription levels per category are prescribed in the First Schedule to the ZEHA constitution and published annually.

Annexure C: Regional Regulatory Benchmarks

The frameworks below show the direction of travel in comparable markets. ZEHA members adopt the substance of these obligations voluntarily now, and offer them as drafting inputs for Zimbabwe's own instrument.

ELEMENT	KENYA: TNC REGULATIONS, 2022	SOUTH AFRICA: NLTA AMENDMENT
Recognition	Transport Network Company licence issued by NTSA; annual renewal	E-hailing recognised as its own service type with a dedicated operating licence, replacing the interim use of meter taxi licences
Corporate and data conditions	Local body corporate; registration with the Data Commissioner as data controller or processor; tax compliance certificate; published deactivation policy	Platform registration with authorities; provincial operating licences for drivers
Safety features	Panic button for drivers and passengers connected to a response centre manned at all times; pre-trip disclosure of driver name and photo, vehicle make, model and registration, and estimated fare; passenger identity verification; trip receipts	Panic button requirements for e-hailing vehicles
Platform accountability	Written transport network agreements between the platform, vehicle owners and drivers; records retained	Fines of up to R100,000 on an application provider that allows an unlicensed operator or vehicle onto the platform
ZEHA voluntary adoption	Adopted by contract in Sections 6.2, 6.4, 6.6, 6.7 and 6.8 of the Code, ahead of any Zimbabwean gazetting	Platform-level accountability adopted in Sections 6.1, 6.5 and 6.12: the register, the Registry and the sanctions ladder

Key statutory references for Zimbabwe: Road Motor Transportation Act [Chapter 13:15]; Road Traffic Act [Chapter 13:11]; Cyber and Data Protection Act [Chapter 12:07] and SI 155 of 2024; Consumer Protection Act [Chapter 14:44]; Companies and Other Business Entities Act [Chapter 24:31]; Competition Act [Chapter 14:28].