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A Systematic Literature Review on the Commercialisation, Tax Entity Identification, Registration and Financial Accountability of Religious Institutions in South Africa, Botswana and Eswatini

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ABSTRACT

Background: Religious institutions across Southern Africa are increasingly involved in commercial activities. These activities include education, healthcare, agriculture, media, publishing, real estate and investment. Diversifying income can improve financial stability and reduce dependence on donations. It can also enable religious institutions to expand essential services within their communities. However, commercialisation creates concerns about taxation, governance, regulation and financial accountability.

Aim: This systematic review examined the relationship between commercialisation, Taxpayer Entity Identification (TEI) registration and financial accountability. It focused on religious institutions in Eswatini, South Africa and Botswana.

Methods: Six electronic databases were searched in accordance with PRISMA 2020 principles. Predefined PICOS criteria guided the identification, screening and selection of eligible studies. The included studies differed considerably in their research methods, samples and reported outcomes. A statistical meta-analysis was therefore inappropriate. Instead, the evidence was synthesised narratively using the Synthesis Without Meta-analysis framework.

Findings: The findings showed that formal registration can improve institutional visibility, transparency, financial reporting and regulatory compliance. However, registration alone does not guarantee meaningful accountability. It must be supported by accurate financial records, effective internal controls, independent governing boards and transparent decision-making. Religious institutions should also separate donations and other exempt income from commercial revenue. South Africa had the most developed regulatory and taxation framework. Botswana maintained formal registration arrangements, although evidence of their accountability effects remained limited. Eswatini lacked a dedicated TEI framework and sufficient empirical research.

Recommendations: The review recommends proportionate regulation, standardised financial reporting, institutional capacity-building and stronger oversight. It also calls for further country-specific research before implementing a comprehensive TEI framework in Eswatini.

Key Words: Commercialisation of Religion; Financial Accountability; Governance; Nonprofit Organisations; Religious Institutions; Religious Taxation; Southern Africa; Systematic Review; Tax Compliance; Taxpayer Entity Identification (TEI).

INTRODUCTION AND BACKGROUND

Religious institutions are major social and economic actors that provide worship, education, healthcare, humanitarian assistance and community-development services (Nkomazana & Motswapong, 2024; Mdluli & Mpofu, 2025). Their activities increasingly extend beyond congregational giving to include property portfolios, schools, media enterprises, publishing, investment funds, conference facilities, paid services and branded products (Kgatle, 2024; Ramooki et al., 2024). Commercialisation therefore refers to religious institutions' adoption of income-generating, market-facing and business-oriented practices (Kgatle, 2022; Kgatle & Qiki, 2023). These activities can strengthen financial sustainability and expand social-service delivery, but they also blur the boundary between tax-exempt religious activity and ordinary commercial enterprise (FATF, 2023; SARS, 2025).

The financial scale of some religious organisations shows why this distinction matters. The Church Commissioners for England held an investment fund of about £11.1 billion in 2024 (Church Commissioners for England, 2025). In the United States, disclosure failures involving a religious institution-affiliated portfolio of approximately US$37.8 billion led to penalties of US$5 million (U.S. Securities and Exchange Commission [SEC], 2023). These cases do not imply that religious wealth is inherently improper. They show why large religious institutions need credible reporting and oversight.

International practice generally separates donations used for genuine religious purposes from unrelated business income. Elevation Church, for example, reported paying estimated unrelated-business income tax in 2024 (Elevation Church, 2025). Tax exemption and taxation of commercial income can therefore coexist. The policy question is whether income from property, investment, media, retail or education should remain exempt when comparable business activities are taxable.

Across Africa, the expansion of Pentecostal, charismatic and prophetic ministries have intensified debate about prosperity teaching, religious entrepreneurship and the marketisation of spiritual services. Commercial practices include paid consultations, promoted seed offerings, branded anointing products, media subscriptions, large religious events and leader-controlled enterprises. Research on African megachurches shows that large memberships and extensive religious networks can support social programmes, but may also enable wealth accumulation by influential leaders where governance and disclosure are weak (Kgatle, 2024). Commercialisation should therefore be understood as a continuum. At one end, income-generating activities finance legitimate religious and social missions; at the other, spiritual authority may be used to secure personal enrichment without adequate accountability.

Digitalisation has further changed the economic organisation of religion. Botswana's prophetic ministries employ advertising, photographs, flyers, stickers and social-media branding to promote religious leaders, events and experiences (Ramooki et al., 2024). Digital visibility creates commercial value by attracting followers, donations, partnerships and consumers before a direct financial transaction occurs. This development expands the meaning of commercialisation beyond the sale of physical products to include the monetisation of attention, religious identity and prophetic authority.

The continental debate is consequently concerned with balancing religious freedom against financial transparency, tax fairness and protection of congregants. The Financial Action Task Force recommends focused, proportionate and risk-based regulation of nonprofit organisations rather than indiscriminate controls that obstruct legitimate religious and charitable work (Financial Action Task Force [FATF], 2023). Proportionality requires simplified obligations for small congregations and enhanced reporting for institutions controlling substantial income, assets or commercial ventures.

Within Southern Africa, South Africa has the most developed framework for recognising and regulating tax-exempt religious institutions. Religious institutions must first register for income tax before applying for public-benefit organisation status. Approval does not remove their continuing responsibilities because exempt organisations must submit annual returns and demonstrate that their income and assets are used for approved public-benefit purposes rather than private gain (South African Revenue Service [SARS], 2024, 2025). South

African evidence nevertheless indicates that formal registration does not automatically ensure accountability. Strategic planning can strengthen organisational direction and resource management (Boya & Chiloane-Phetla, 2022), while unclear reward systems can blur the distinction between voluntary ministry and remunerated employment (Boya, 2022). Letswalo and Naidoo (2024) found that some prophetic leaders resisted boards and formal accountability structures because they viewed spiritual authority as superior to administrative control.

Botswana registers religious institutions through its societies-registration system, which establishes their legal identity and provides the state with basic organisational information (Government of Botswana, n.d.). However, existing empirical studies concentrate on digital religion, prophetic authority and religious marketing rather than financial statements, taxation, auditing and internal control. Nkomazana and Motswapong (2024) demonstrate the importance of interfaith collaboration, but whether religious umbrella bodies improve financial compliance has not been tested. Botswana therefore has a formal identification system without sufficient evidence demonstrating that registration produces substantive financial accountability.

Eswatini presents the most significant regulatory and empirical gap. Registered religious institutions generally receive tax-exempt status, although congregants' contributions are not tax deductible (U.S. Department of State, 2023). Emerging research connects credible church leadership with ethics, community engagement and public accountability (Mdluli & Mpofu, 2025). However, no substantial body of current empirical research quantifies the commercial revenue, assets, tax liabilities or financial-reporting practices of Eswatini's religious institutions. This absence of reliable financial data is itself an accountability concern: without standardised reporting, neither researchers nor regulators can determine how much income is generated, how commercial revenue is distinguished from donations or whether tax exemptions are being applied appropriately.

The taxation question must be considered alongside national fiscal pressures. South Africa's public debt exceeded 75% of GDP by the end of 2024 (IMF, 2025a). Botswana recorded a deficit of about 7.1% of GDP in 2024/2025 as mineral revenue declined (IMF, 2025b). Eswatini also faced a deficit, debt close to 40% of GDP and the risk of lower customs revenue (IMF, 2025c).

These pressures do not justify taxing worship or genuine charity simply to raise revenue. They do strengthen the case for horizontal tax equity. Commercial income from schools, media, property, retail or events may compete with taxable businesses (SARS, 2025, 2026; BURS, 2026). Blanket exemption can narrow the tax base and disguise private benefits, whereas indiscriminate taxation may weaken small congregations and valuable community services (ERS, 2025; FATF, 2023).

A proportionate approach should therefore preserve exemptions for donations and income applied directly to verified religious or public-benefit purposes while taxing unrelated commercial income exceeding clearly defined thresholds (BURS, 2026; SARS, 2025, 2026). Larger institutions should separate charitable and commercial accounts, disclose related-party transactions, maintain organisational bank accounts and submit independently reviewed or audited financial statements (SARS, 2025; FATF, 2023). Such risk-based requirements would protect religious freedom and legitimate charitable activities while ensuring that tax exemption follows demonstrable public benefit rather than an organisation's religious identity or legal classification (FATF, 2023; SARS, 2025).

In this review, Tax-Entity Identification (TEI) registration denotes the process through which a religious institution obtains a legal and tax identity and becomes subject to classification, filing, reporting and monitoring requirements. South African nonprofit organisations must register for income tax before applying for public-benefit exemption (South African Revenue Service [SARS], 2024). Botswana requires religious institutions to register through its societies-registration system (Government of Botswana, n.d.). In Eswatini, registered religious institutions generally receive tax exemption, but this status does not demonstrate financial accountability (U.S. Department of State, 2023).

TEI should therefore operate as a continuing accountability pathway involving registration, income classification, disclosure, annual reporting and regulatory verification (SARS, 2025). Financial accountability additionally requires budgeting, bookkeeping, internal controls, independent boards and transparent resource use. Registration improves visibility but cannot prevent abuse where founders dominate decisions or donations and commercial revenue remain indistinguishable (Letswalo & Naidoo, 2024). Effective TEI consequently requires coordinated, proportionate oversight by tax authorities, registrars, financial institutions and religious-sector bodies (FATF, 2023).

Commercialisation has increased the financial complexity of religious institutions in South Africa, Botswana and Eswatini, yet the available evidence does not establish the amount of commercial income generated or whether registration improves financial accountability. The gap is most serious in Eswatini, where the absence of a dedicated TEI pathway and standardised financial reporting prevents reliable assessment of taxable income, exemption use and private benefit. This creates risks of revenue opacity, unequal tax treatment, weak regulatory oversight and declining public trust.

It is against this background that the current study aims to synthesise current empirical evidence on the relationships among commercialisation, TEI registration or equivalent identification systems, and financial accountability in religious institutions in Eswatini, South Africa and Botswana. The specific objectives are to examine the nature and extent of commercialisation among religious institutions in the three countries; to assess how TEI registration or equivalent regulatory identification influences financial reporting, tax compliance and accountability, to compare commercialisation, regulatory arrangements and financial-accountability outcomes across Eswatini, South Africa and Botswana, to identify governance, private-benefit and tax-compliance risks associated with commercialised and prosperity-oriented religious institutions and To develop evidence-based recommendations for proportionate taxation, financial reporting and regulatory oversight in Eswatini and the wider SADC region.

LITERATURE REVIEW

Commercialisation as organisational transformation

Commercialisation occurs when religious institutions adopt income-generating and business-oriented practices to sustain ministries and social programmes. Activities may include paid consultations, branded spiritual products, broadcasting, property, schools, healthcare facilities and fundraising. Entrepreneurship and social innovation can mobilise resources and address community needs (Antonites et al., 2019), while churches may support development and disadvantaged communities through their assets and local partnerships (Mangayi, 2018; Beukes, 2019). Fundraising, saving and responsible planning can also strengthen ministry sustainability (Kabongo, 2021). Strategic planning consequently supports governance, productivity and organisational continuity (Boya & Chiloane-Phetla, 2022).

Commercialisation should not automatically be considered exploitative. Diversified income can reduce dependence on donations, create employment and finance public-benefit services. However, it increases organisational complexity and may blur boundaries between voluntary ministry and paid employment (Boya, 2022). Donor engagement can improve reporting while increasing external dependence, and professionalisation may reshape religious identity, priorities and everyday practices (Bowers du Toit, 2019a, 2019b; Burchardt, 2013). Risks become serious when founders control income and assets without independent boards, internal controls, transparent reporting or congregational scrutiny. Leader-centred authority and resistance to conventional governance structures can similarly weaken personal, communal and public accountability (Letswalo & Naidoo, 2024).

Prosperity-oriented ministries make these tensions particularly visible because wealth may signify divine favour and giving may be presented as a route to material blessing (Masenya & Masenya, 2018; Niemandt, 2017; Rakotsoane, 2021). Deliverance services and religious products may consequently transform spiritual authority into marketable value (Kgatle, 2022; Kgatle & Qiki, 2023).
Botswana demonstrates commercialisation's digital dimension. Prophetic churches use Facebook to construct institutional identities, extend their reach and strengthen leaders' authority (Faimau & Behrens, 2016). Digitally circulated testimonies promote ministries, legitimise prophetic leaders and shape communal identities (Faimau, 2017a, 2017b). Branding, photographs, flyers, stickers and social-media advertising also position prophets as recognisable human brands and religious experiences as consumable offerings (Ramooki et al., 2024).

In Eswatini, empirical evidence remains limited; commercialisation should therefore be treated as an emerging governance concern rather than an established national pattern. Religious institutions can become complex organisations requiring professional management (Mbanze, 2011), while ethical leadership supports legitimacy and accountability (Mdluli & Mpofu, 2025). Although religious institutions generally receive tax exemptions, unclear separation of donations, trading income and private benefits may weaken transparency (U.S. Department of State, 2023; Eswatini Revenue Service, 2025). Commercialisation should therefore be assessed as a continuum using evidence on ownership, income classification, related-party transactions, pricing, donations, leadership control and profit distribution. Assessment balances sustainability, accountability and religious autonomy.

Tax-entity identification and registration

Taxpayer Entity Identification (TEI) should be understood as an enabling accountability pathway rather than conclusive evidence of financial accountability. It establishes legal identity and regulatory visibility while activating registration, recordkeeping, income classification, reporting and tax-filing obligations (SARS, 2024, 2025, 2026; Government of Botswana, n.d.). Nevertheless, none of the empirical studies included in the review causally demonstrated that obtaining a tax-registration number improves financial reporting or regulatory compliance. Formal registration may therefore produce only symbolic compliance when appropriate governance structures are absent (Letswalo & Naidoo, 2024). Effective TEI consequently requires competent and independent boards, institutional bank accounts, robust internal controls, transparent financial reporting and clear separation among donations, commercial revenue and leaders' personal resources (Boya & Chiloane-Phetla, 2022; FATF, 2023). These complementary mechanisms transform TEI from a once-off administrative identifier into a continuing, proportionate and risk-based accountability process (FATF, 2023; SARS, 2025, 2026).

South Africa has the most developed framework. Religious institutions register for income tax before applying for public-benefit status and remain responsible for annual returns (SARS, 2024, 2025, 2026). Even so, registration can become symbolic when leaders resist boards or congregational scrutiny (Letswalo & Naidoo, 2024; Matshobane & Masango, 2018). Botswana's societies system record's organisational identity, but this does not prove improved reporting, controls or tax compliance (Government of Botswana, n.d.). Society registration should therefore connect with tax identification, organisational accounts, annual reporting and income classification. Interfaith bodies could support education and cooperation (Nkomazana & Motswapong, 2024). Eswatini has the weakest evidence. Legal recognition does not confirm reliable records or separation of donations, commercial income and leaders' benefits (U.S. Department of State, 2023). It needs an integrated pathway linking registration, tax identification, activity classification and continuing reporting. Across all three countries, small congregations need simple requirements, while larger commercialised institutions require enhanced disclosure and independent review (FATF, 2023).

Financial accountability and institutional legitimacy

Financial accountability requires budgeting, bookkeeping, internal controls, board oversight, independent review and disclosure to regulators, donors and congregants (Boya & Chiloane-Phetla, 2022; Letswalo & Naidoo, 2024; SARS, 2025). Across South Africa, Botswana and Eswatini, registration provides institutional visibility but does not necessarily demonstrate substantive accountability (Government of Botswana, n.d.; U.S. Department of State, 2023; SARS, 2024, 2025). Comparative evidence remains uneven, making focused, proportionate and risk-based oversight essential for strengthening accountability without unnecessarily restricting legitimate religious activities (FATF, 2023).

Comparative evidence remains uneven. South Africa has the clearest rules, but concentrated spiritual authority and donor dependence can still weaken oversight (Letswalo & Naidoo, 2024; Bowers du Toit, 2019a, 2019b). Botswana's research centres on digital promotion and prophetic authority. It does not show that registration improves control, auditing or tax compliance (Ramooki et al., 2024). Eswatini lacks evidence on recordkeeping, board independence and transparent accounts, despite the growing complexity of church-founded institutions (Mbanze, 2011; Mdluli & Mpofu, 2025). Future studies should use common definitions and combine interviews with financial statements, tax records and audit evidence. Tiered regulation should require basic bookkeeping and organisational accounts from smaller churches. Larger institutions should classify income, disclose related-party transactions and undergo independent review (FATF, 2023).

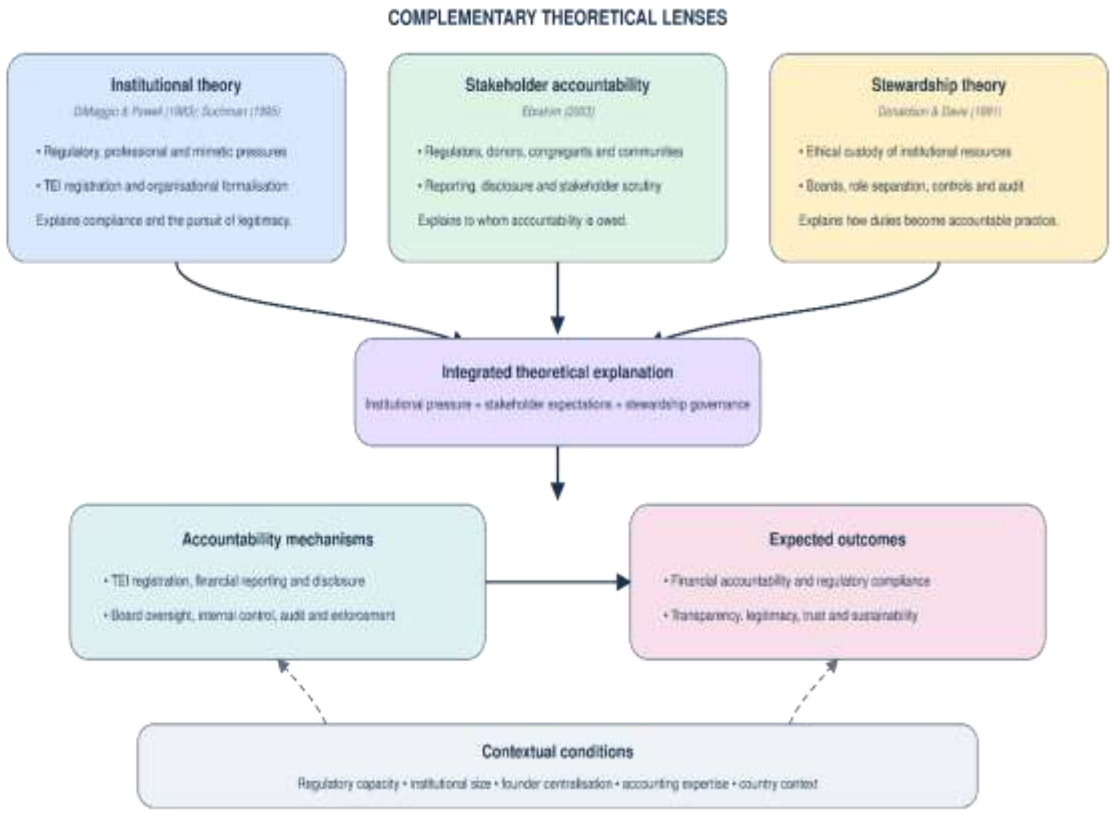
THEORETICAL FRAMEWORK

This review combines institutional, stakeholder accountability and stewardship theories. Together, they explain why religious institutions formalise, to whom they are accountable and how formal obligations become governance practices. Figure 1 below presents the theoretical framework.

Institutional theory explains organisational responses to coercive, normative and mimetic pressures (DiMaggio & Powell, 1983). Coercive pressures arise from legislation and regulators, normative pressures from professional expectations, and mimetic pressures from imitating organisations considered legitimate. Organisations adopt accepted structures to obtain or preserve legitimacy (Suchman, 1995). This perspective explains why commercial churches introduce registration, accounting systems, boards and reporting procedures. South African tax-registration and annual-return requirements, Botswana's societies-registration system and Eswatini's emerging scrutiny of church commercial activity create pressures for formalisation (Government of Botswana, 2023, 2024; SARS, 2024, 2025, 2026; Eswatini Revenue Service, 2025). However, registration may remain symbolic when formal structures coexist with founder dominance, weak controls and limited disclosure (Letswalo & Naidoo, 2024).

Stakeholder accountability theory identifies the parties entitled to information, justification and scrutiny (Ebrahim, 2003). Religious institutions are accountable upward to regulators and donors, internally to boards and employees, and downward to congregants, beneficiaries and communities. Regulators require compliance, donors expect evidence of resource use, and congregants require transparency regarding donations, offerings and assets. Donor requirements may strengthen reporting but can also create dependence and redirect institutional priorities (Bowers du Toit, 2019a, 2019b). Accountability therefore extends beyond government filing to include congregational participation, disclosure and accessible oversight.

Figure 1: Theoretical Framework



Source: Adapted from: Institutional, Stakeholder Accountability and Stewardship Theories

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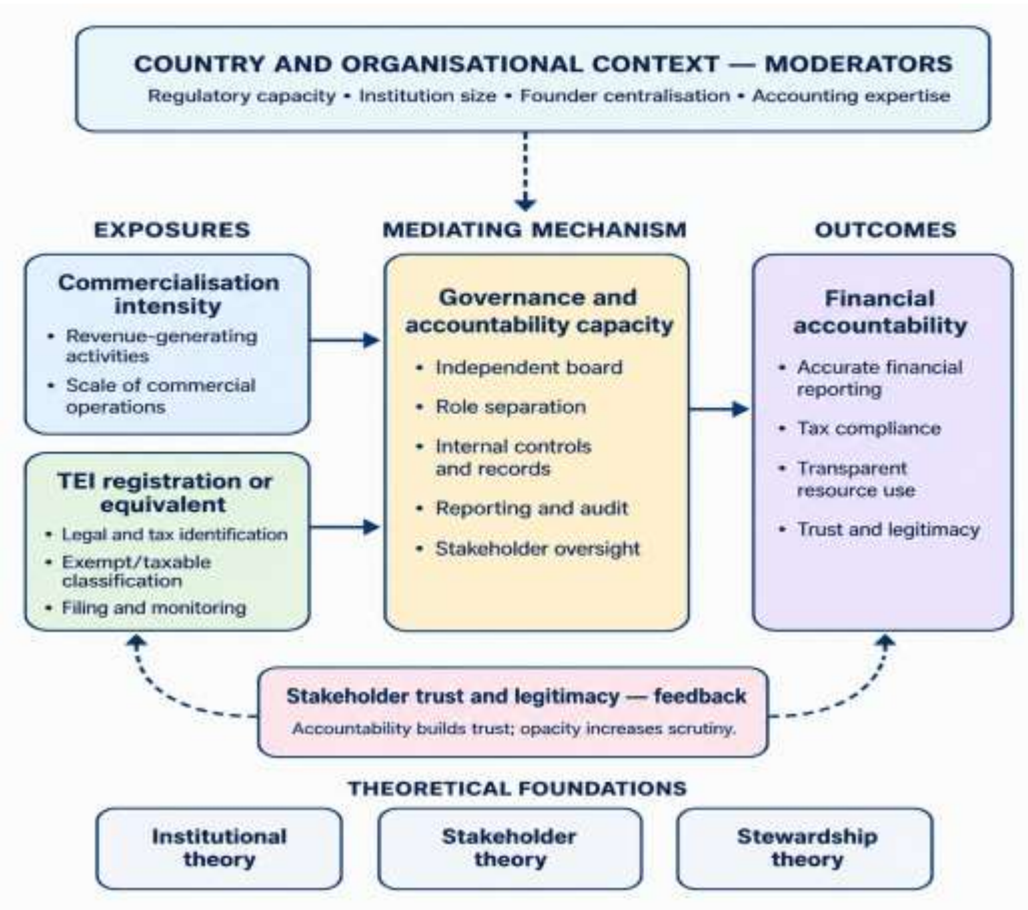
Stewardship theory regards leaders as custodians responsible for protecting organisational resources and advancing institutional purposes (Donaldson & Davis, 1991). In religious institutions, stewardship concerns donations, property, commercial income and public-benefit resources. Ethical intention and spiritual trust cannot replace independent boards, role separation, documented authorisation, internal controls and financial review. These mechanisms become particularly important when founders control spiritual authority, assets and financial decisions.

The integrated framework proposes that institutional pressures and stakeholder expectations require stewardship mechanisms, producing TEI registration, reporting, disclosure, board oversight, internal control and auditing. These mechanisms are expected to improve compliance, transparency, trust, legitimacy and sustainability. However, outcomes depend on regulatory capacity, institutional size, founder centralisation, accounting expertise and country context. The framework therefore treats TEI as an enabling mechanism rather than proof of accountability and supports simplified requirements for small congregations alongside enhanced disclosure and independent review for large commercialised institutions (FATF, 2023).

CONCEPTUAL FRAMEWORK

The conceptual framework explains how commercialisation and Taxpayer Entity Identification (TEI) registration influence financial accountability through governance and accountability capacity. These relationships are moderated by country and organisational conditions, while stakeholder trust and institutional legitimacy create a feedback process. Institutional, stakeholder and stewardship theories provide the framework's theoretical foundations. Figure 2 below illustrates the conceptual framework.

Figure 2: Conceptual Framework



Source: Adapted from the Study's Main Variables

Commercialisation intensity describes the extent and scale of a religious institution's revenue-generating activities. These activities can strengthen sustainability, reduce dependence on donations and finance community services (Antonites et al., 2019; Kabongo, 2021). However, increasing transaction volumes and revenue diversity create taxation, accounting and governance risks. Commercialisation is therefore treated as a neutral exposure whose effect depends on transparent income classification, legitimate resource use and independent oversight. Founder control and the mixing of donations with commercial revenue increase accountability risks (Letswalo & Naidoo, 2024).

TEI registration refers to the legal and fiscal identification of religious institutions through tax registration, classification of exempt and taxable activities, filing obligations and regulatory monitoring. South Africa requires tax registration before public-benefit exemption and annual returns after approval (SARS, 2024, 2025, 2026). Botswana combines societies registration with tax and return-filing requirements (Government of Botswana, 2023, 2024; BURS, 2026), while Eswatini's debate emphasises financial records and separation of exempt activity, commercial income and leaders' private benefits (Eswatini Revenue Service, 2025). Registration nevertheless creates only an accountability pathway; without governance, it may produce symbolic compliance.

Governance and accountability capacity is the mediating construct through which commercialisation and TEI obligations become accountable practices. Its dimensions include board independence, separation of leadership and financial roles, internal controls, reliable records, reporting, independent review and stakeholder oversight. Independent boards limit unilateral decisions, role separation prevents individuals from controlling transactions, and documented controls provide verifiable evidence of resource use. Reporting and auditing enable regulators, donors and congregants to scrutinise financial conduct (Ebrahim, 2003). Commercialisation creates resources and risks, while TEI activates obligations, but neither improves accountability without strategic planning, accounting expertise and oversight (Boya & Chiloane-Phetla, 2022).

Financial accountability is the principal outcome and encompasses accurate reporting, tax compliance, transparent resource use, stakeholder disclosure and responsible asset management. Country and organisational context moderates these relationships. Regulatory capacity influences enforcement; institutional size shapes transaction complexity; founder centralisation affects board independence; and accounting expertise determines record quality. Consequently, TEI requirements may produce different outcomes across South Africa, Botswana and Eswatini. Proportionate regulation should simplify reporting for small congregations and require enhanced disclosure from large commercialised institutions (FATF, 2023).

Stakeholder trust and institutional legitimacy provide feedback. Transparency strengthens congregational confidence, donor support and legitimacy, whereas opacity increases scrutiny and reform pressure. Overall, institutional theory explains formalisation pressures, stakeholder theory identifies accountability recipients, and stewardship theory explains responsible resource governance (DiMaggio & Powell, 1983; Donaldson & Davis, 1991; Suchman, 1995).

METHODS

Research Design

This review followed PRISMA 2020 principles to identify, screen, appraise and synthesise empirical studies (Page et al., 2021). Predefined criteria covered the population, national contexts, designs and accountability outcomes. The same screening process was used at title, abstract and full-text stages. Quality appraisal preceded synthesis. These steps reduced selection bias, improved transparency and supported comparison across the three countries.

Data Collection

Six electronic databases were searched using predetermined keywords and Boolean combinations. The terms covered religious institutions, commercialisation, tax registration, governance and financial accountability. Records were exported, and duplicates were removed. Title and abstract screening preceded full-text assessment.

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Reasons for exclusion were recorded. A standardised form captured authorship, year, country, design, sample, setting, methods, findings and accountability outcomes. This process supported consistent and accurate extraction.

Analytical Tools

PRISMA flow reporting documented study selection. JBI checklists assessed quality and risk of bias across qualitative, quantitative and mixed-methods designs. Meta-analysis was unsuitable because the studies differed in design, sample, measurement and outcomes. The SWiM framework therefore guided a narrative synthesis organised by theme, country and effect direction. Evidence tables supported comparison, while appraisal findings determined the weight given to each study.

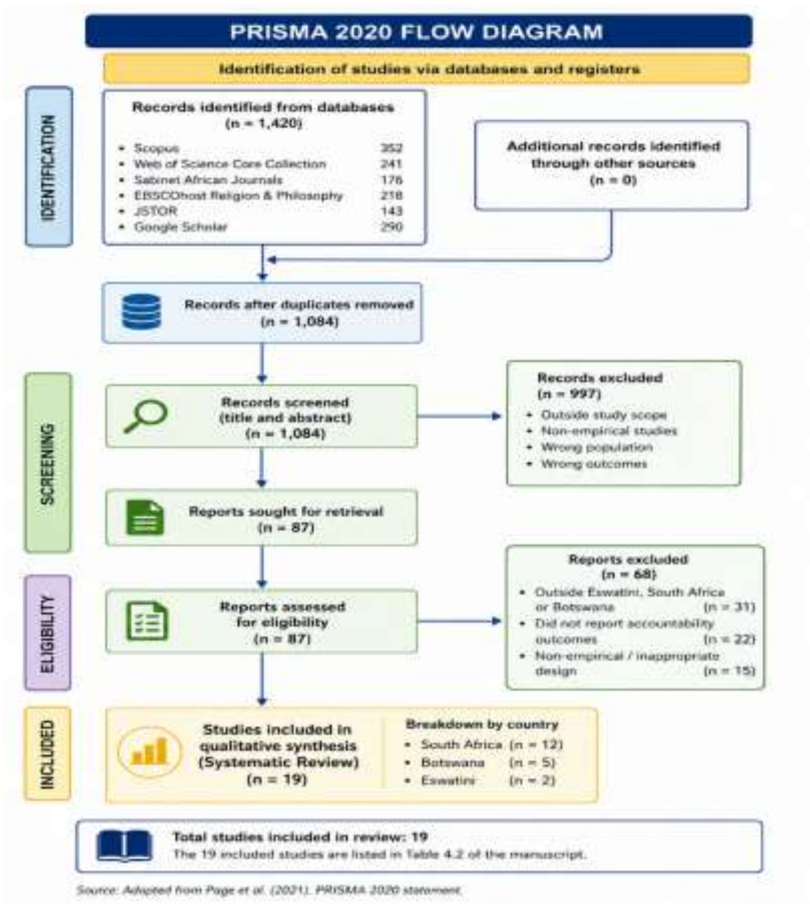
Study Selection

The searches retrieved 1,420 records. Duplicate removal left 1,084 unique records, of which 997 were excluded during title-and-abstract screening. Full-text assessment covered 87 articles, excluding 68, 31 examined other countries, 22 lacked financial-accountability outcomes and 15 were non-empirical, ensuring transparent selection aligned with PRISMA 2020 reporting and transparency requirements. Nineteen studies met all criteria and entered the synthesis.

Study Characteristics

Figure 3 below presents the PRISMA 2020 flow diagram, including exclusions and reasons. The 19 eligible studies that formed the narrative-synthesis evidence base are also included.

Figure 3: PRISMA 2020 Flow Diagram



Source: PRISMA 2020 Flow

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The studies varied geographically, methodologically and thematically. South Africa supplied most evidence, whereas Eswatini remained under-researched. Designs included qualitative, quantitative and mixed-methods approaches. This diversity reflects the need for quantitative evidence on reporting and compliance alongside qualitative insight into leadership, culture and stakeholder experience. Most studies examined commercialisation, governance, financial reporting, registration, taxation, regulatory compliance or accountability. South African research emphasised organisational management, prosperity ministries and transparency, while Eswatini studies focused mainly on leadership, institutional governance and public accountability.

Research remains geographically and methodologically uneven. This limits comparison and highlights the need for stronger Eswatini evidence. Table 1 presents the 19 included studies.

Table 1: Characteristics of the Nineteen Empirical Studies Included in the Systematic Review

No	Author(s) Year	Country	Study Design	Main Focus	Key Contributions
1	Antonites, Schoeman, and Van Deventer (2019)	South Africa	Qualitative	Governance, leadership and social-innovation capacity of a religious organisation	Found that leadership, entrepreneurial capacity, resource availability and organisational development affect the church's ability to respond innovatively to community needs. It recommends stronger managerial capacity, networking and sustainable resource mobilisation.
2	Bowers du Toit (2019)	South Africa	Mixed Method	Donor funding, donor relationships and financial sustainability of religious-based institutions	Demonstrated that donor relationships influence the financial sustainability and organisational identity of religious-based institutions. It identified unstable funding, donor-recipient power imbalances and tensions between maintaining a Christian identity and meeting secular donor requirements.
3	Boya and Chiloane-Phetla (2022)	South Africa	Qualitative	Strategic planning and management practices among modern religious institutions operating as nonprofit organisations	Adopting formal strategic-planning tools to improve organisational direction, productivity, governance and long-term sustainability in religious institutions.
4	Boya (2022)	South Africa	Qualitative	Volunteer management, reward systems and the financial implications of professionalising church administration	Found that volunteerism is declining as church-management responsibilities become increasingly professional and demanding. The study recommends sustainable revenue-generation and appropriate reward systems for church managers and volunteers.
5	Burchardt (2013)	South Africa	Qualitative	Donor relationships and organisational	Showed how donor requirements encourage religious institutions and

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				change in Christian HIV/AIDS organisations	FBOs to adopt formal NGO structures, professional management practices and reporting systems, while informal religious and patronage relationships continue to influence actual operations.
6	du Plessis and Nkambule (2020)	South Africa	Mixed Method	Pastoral leadership, governance practices and servant leadership	Identified leadership styles and challenges affecting how pastors govern congregations. The study proposes servant-leadership formation as a mechanism for strengthening responsible, ethical and accountable church leadership.
7	Kabongo (2021)	South Africa	Qualitative	Financial literacy and ministry sustainability	Demonstrated that financial training, diversified fundraising, savings and board oversight can strengthen organisational sustainability.
8	Letswalo & Naidoo (2024)	South Africa	Qualitative	Ministerial Accountability	Weak boards and leader-centred authority limit organisational and financial accountability.
9	Mangayi (2018)	South Africa	Qualitative	Church organisational capacity, financial sustainability and local economic development	Found that township religious institutions possess organisational and community assets that could support local economic development, but that poverty, unemployment and dependence on external assistance constrain their financial sustainability.
10	Matshobane and Masango (2018)	South Africa	Qualitative	Power struggles, governance structures and church leadership	Demonstrated that church polity, financial disputes, insufficient leadership preparation and weak leadership structures are major sources of conflict. It provides direct empirical evidence that unclear authority and financial arrangements undermine church governance.
11	Öhlmann, Frost, and Gräb (2016	South Africa	Qualitative	Organisational structures, development activities and partnerships	Established that African Initiated Religious institutions possess significant community-development capacity but require appropriate organisational structures and partnerships. It contributes evidence concerning institutional capacity, development priorities and organisational formalisation.
No	**Author(s) Year**	**Country**	**Study Design**	**Main Focus**	**Key Contributions**
12		South Africa	Quantitative		Found only moderate levels of mutual care and weaknesses in trust and mutual

	Roeland, Breed, and Denton (2025)			Mutual care, trust, responsibility and accountability within congregations	dependence. It demonstrates the value of gathering congregants' perspectives when evaluating accountability, organisational relationships and congregational health.
13	Faimau (2017a)	Botswana	Qualitative	Digitisation of religious testimonies among prophetic ministries	Demonstrates how testimonies function as institutional communication and promotional mechanisms. Their online circulation extends the ministries' visibility, reinforces prophetic authority and strengthens institutional identity.
14	Faimau (2017b)	Botswana	Qualitative	Religious testimonies and the construction of individual, communal and institutional identity	Shows that testimonies do more than communicate personal experiences: they consolidate organisational identity, reinforce relationships between leaders and followers and legitimise prophetic ministries.
15	Faimau (2018)	Botswana	Mixed-methods with	Emergence, growth, registration and media positioning of prophetic ministries	Provides the strongest Botswana evidence on the rapid organisational growth of prophetic ministries. It documents increased church-registration applications and shows how leader-centred structures and digital media strengthen institutional expansion and prophetic authority.
16	Nkomazana and Motswapong (2024	Botswana	Qualitative	Interfaith and intra-Christian collaboration among Pentecostal and other Christian organisations in national and community development	Shows how umbrella organisations provide platforms for dialogue, cooperation and collective action among churches. It identifies interfaith education, mutual trust, community service and collaboration on issues of national interest as mechanisms through which religious organisations contribute to unity and development in Botswana.
17	Ramooki, Faimau, and Kesebonye (2024)	Botswana	Qualitative	Religious marketing and transformation of prophetic religious practices	Demonstrates that prophetic ministries employ secular marketing, branding and promotional strategies. Religious flyers, stickers, prophetic images and associated products turn religious identity and services into consumable and commercially promoted experiences.
No	**Author(s) Year**	**Country**	**Study Design**	**Main Focus**	**Key Contributions**
18	Mdluli and Mpofu (2025)	Eswatini	Qualitative	Ethical Leadership and public accountability	Found that unethical leadership conduct can weaken public trust in religious institutions and recommended stronger community engagement, exemplary

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					leadership and collaborative accountability.
19	Mbanze (2011)	Eswatini	Qualitative	Legal, governance, management and funding arrangements in a church-established institution	Identified the legal, organisational and financial arrangements required to establish and manage Southern Africa Nazarene University, including governance structures and income-generation strategies.

Risk of Bias Assessment

Eleven studies were classified as high risk of bias and eight as moderate; none met the low-risk threshold. Common weaknesses concerned sampling, measurement, researcher reflexivity and incomplete reporting. The Eswatini studies were particularly limited. Findings must therefore be interpreted cautiously, and future research requires stronger designs, transparent sampling and validated accountability measures.

Qualitative studies often omitted reflexivity, saturation and credibility procedures; quantitative evidence used small, context-specific samples and few validated accountability measures. Weaker studies were retained to preserve evidence from under-researched settings, but appraisal results moderated interpretation.

Synthesis of Results

SWiM synthesis produced three related themes: financial reporting and audit, governance and oversight, and registration and regulatory compliance. Fifteen studies associated weak registration or governance with shortcomings in financial reporting. Oversight was often informal, with limited independent verification. Formal registration appeared to support institutional visibility and responsible management, although it could not guarantee accountability without functioning boards, controls and reporting. Botswana offered comparatively favourable evidence concerning registered organisations, while Eswatini evidence was sparse, qualitative and insufficient to establish how TEI affects accountability. Transparent reporting, effective governance and proportionate regulation should therefore be treated as mutually reinforcing mechanisms rather than isolated interventions.

Reporting, audit, resource separation and documented authorisation were the clearest accountability indicators. Founder authority and weak boards often constrained oversight. Planning, role clarity and competent boards supported sustainability. Registration improved legal visibility and income classification but still required enforcement and reliable records. Requirements should remain simple for small congregations and become stronger for institutions controlling businesses or substantial assets.

Effect Direction

Seventeen studies indicated that absent formal registration or equivalent oversight was associated with weaker accountability; two showed no clear direction, and none favoured non-registration. This pattern supports combined improvements in registration, governance, reporting and oversight. However, the moderate-to-high risk of bias means the effect-direction result indicates consistency, not a causal estimate. It provides a rationale, rather than conclusive proof, for an Eswatini taxation framework.

Results Per Theme

Theme 1: Governance and oversight

Governance capacity emerged as the mechanism through which formal obligations were converted into accountable practice. Studies associated competent boards, role clarity, strategic planning, internal controls and stakeholder scrutiny with stronger organisational sustainability and responsible resource management. Conversely, founder-centred authority, weak board independence and the concentration of spiritual, administrative and financial power reduced effective oversight. These risks were especially visible in commercialised and prosperity-oriented ministries, where leaders could influence income collection, expenditure and asset control. Commercialisation itself was not uniformly harmful because income-generating activities could support ministry and community services. Accountability problems arose when organisational growth exceeded governance and financial-management capacity. The evidence therefore supports separating leadership and financial roles, documenting approvals, using institutional bank accounts and enabling boards, congregants and regulators to scrutinise material transactions. Nevertheless, predominantly qualitative designs and moderate-to-high risk of bias limit causal claims.

Theme 2: Registration and regulatory compliance

Formal registration or equivalent identification generally improved legal visibility and created a basis for income classification, return filing and regulatory monitoring. Seventeen studies indicated that absent registration or equivalent oversight was associated with weaker accountability, while two reported no clear direction. None favoured non-registration. South Africa had the clearest tax-registration, public-benefit and annual-return arrangements. Botswana maintained formal societies-registration mechanisms, although available studies did not demonstrate that registration improved auditing, internal controls or tax compliance. Eswatini had the weakest empirical evidence and no integrated TEI pathway linking institutional recognition, tax identification, activity classification and continuing reporting. Across the three countries, registration alone could become symbolic where enforcement, records and governance structures were weak. The results consequently support a proportionate system: simplified obligations for small congregations and enhanced disclosure, income classification and independent review for larger institutions controlling substantial assets or commercial enterprises.

Theme 3: Financial reporting and audit

The evidence consistently identified financial reporting, recordkeeping and independent verification as central indicators of accountability. Across the included studies, stronger accountability was associated with accurate bookkeeping, documented authorisation, regular financial statements and clear classification of income. However, reporting practices varied considerably. Many institutions relied on informal systems, and few studies presented direct evidence from audited statements, tax records or regulatory filings. The separation of donations and exempt religious income from commercial revenue was particularly important because mixed accounts obscured the source and use of funds. Independent audit or review strengthened credibility, but these practices were less evident among small institutions and in the limited Eswatini evidence. Overall, the findings suggest that registration can create reporting obligations, but it cannot improve reporting quality unless institutions possess appropriate accounting skills, reliable records and accessible reporting standards.

DISCUSSION

Summary of the Main Findings

The review found that commercialisation, Taxpayer Entity Identification (TEI) registration and financial accountability are closely connected. Commercialisation increases the financial resources available to religious institutions, but it also expands organisational complexity and exposure to governance and taxation risks. Formal registration creates institutional visibility and reporting obligations, while governance capacity determines whether these obligations produce meaningful accountability. The findings therefore indicate that registration, transparent reporting and functioning governance structures are generally associated with stronger accountability. However, the moderate-to-high risk of bias across the included studies means that these relationships should not be interpreted as causal.

Commercialisation was not inherently exploitative. Income-generating activities can reduce dependence on donations, improve institutional sustainability and finance education, healthcare and community-development programmes. This finding supports Antonites et al. (2019), who show that social innovation can enable religious organisations to mobilise resources for community needs. It also aligns with Kabongo (2021), who connects fundraising, saving and responsible planning with sustainable ministry, and Boya and Chiloane-Phetla (2022), who emphasise the contribution of strategic planning to organisational continuity and performance. Commercialisation can therefore create public value when income is transparently managed and directed towards legitimate religious and social objectives.

Nevertheless, accountability risks emerged when commercial expansion exceeded institutional governance and accounting capacity. Diversified income creates additional transactions, assets and financial relationships that require reliable recordkeeping and stronger controls. Boya (2022) similarly observes that organisational development may blur the boundary between voluntary ministry and formal employment. Bowers du Toit (2019a, 2019b) further demonstrates that donor relationships may strengthen financial reporting while creating external dependence and influencing institutional priorities. Commercialisation consequently produces a dual outcome: it may strengthen sustainability, but it may also weaken institutional independence and transparency when financial decision-making is concentrated among a few leaders.

Prosperity-oriented and founder-led ministries were especially vulnerable to governance weaknesses. The review found that concentrated spiritual, administrative and financial authority could undermine board independence, congregational scrutiny and transparent disclosure. This supports Letswalo and Naidoo (2024), who associate leader-centred authority and resistance to conventional governance structures with weakened personal, communal and public accountability. It also reflects studies showing that prosperity teachings may present wealth as divine favour and giving as a pathway to material blessing (Masenya & Masenya, 2018; Niemandt, 2017; Rakotsoane, 2021). Where spiritual services and religious products are commercialised, religious authority may acquire market value, increasing the need for independent oversight (Kgatle, 2022; Kgatle & Qiki, 2023).

The review further found that TEI registration should be regarded as an enabling accountability mechanism rather than proof of accountability. Registration establishes legal identity and activates recordkeeping, income-classification, reporting and tax-filing obligations (SARS, 2024, 2025, 2026). However, none of the included empirical studies demonstrated a direct causal relationship between registration and improved financial accountability. Formal registration may therefore become symbolic when institutions lack competent boards, internal controls, institutional bank accounts and reliable financial records. Effective TEI must be supported by clear separation among donations, commercial revenue and leaders' personal resources (Boya & Chiloane-Phetla, 2022; FATF, 2023).

National differences were substantial. South Africa supplied the broadest evidence and had the clearest taxation and public-benefit framework. Its religious institutions must register for income tax before applying for public-benefit status and remain responsible for annual returns (SARS, 2024, 2025, 2026). However, formal requirements do not eliminate founder dominance, weak boards or limited congregational scrutiny (Letswalo & Naidoo, 2024; Matshobane & Masango, 2018). Botswana maintains formal registration arrangements, but available research concentrates mainly on prophetic authority, branding and digital promotion rather than financial reporting, auditing and tax compliance (Faimau & Behrens, 2016; Ramooki et al., 2024). Eswatini had the weakest evidence base. Existing research provides limited information on institutional recordkeeping, independent oversight and the separation of commercial and religious income (Mbanze, 2011; Mdluli & Mpofu, 2025).

Overall, the findings demonstrate that commercialisation creates both resources and risks, TEI registration establishes regulatory obligations, and governance capacity determines whether those obligations produce meaningful financial accountability. Religious institutions must therefore identify income sources, separate charitable and commercial activities, disclose material and related-party transactions, maintain organisational accounts and ensure independent oversight.

Comparison with Existing Literature

The findings are consistent with the broader nonprofit literature, which treats accountability as a multidimensional governance process rather than a narrow accounting requirement. Financial statements are important, but accountability also involves ethical leadership, answerability, stakeholder participation, regulatory compliance and responsible stewardship. Research links transparent disclosure, effective governing boards and appropriate regulation with institutional legitimacy and stakeholder trust (Alregab, 2026; Ghoorah et al., 2025; Ortega-Rodríguez et al., 2024). The present review extends this argument to religious institutions by showing that spiritual authority and organisational trust do not remove the need for formal controls and independent scrutiny.

The finding that commercialisation can produce both positive and negative outcomes agrees with research on religious entrepreneurship and social innovation. Antonites et al. (2019) show that entrepreneurial practices can help religious organisations address social needs, while Mangayi (2018) and Beukes (2019) emphasise the contribution of church assets and partnerships to disadvantaged communities. Kabongo (2021) similarly connects responsible financial planning with sustainable ministry. These studies challenge the assumption that all commercial activity is incompatible with religious purposes.

However, the review also supports concerns that increasing professionalisation and revenue diversification can alter institutional priorities and relationships. Bowers du Toit (2019a, 2019b) demonstrates that donor engagement can improve reporting but may also produce dependency. Burchardt (2013) argues that professionalisation can reshape religious identity and everyday organisational practices. The review confirms these tensions by showing that commercialisation becomes problematic when financial growth is not matched by stronger governance, accounting expertise and stakeholder oversight.

The evidence concerning prosperity-oriented ministries further supports existing scholarship on the commercial use of religious authority. Masenya and Masenya (2018), Niemandt (2017) and Rakotsoane (2021) explain how prosperity teachings may connect faith, giving and expectations of material reward. Kgatle (2022) and Kgatle and Qiki (2023) demonstrate how deliverance services and religious products may transform spiritual influence into economic value. Botswana's prophetic churches extend this process through digital branding, testimonials and social-media promotion (Faimau & Behrens, 2016; Faimau, 2017a, 2017b; Ramooki et al., 2024). The review therefore broadens the understanding of commercialisation beyond direct sales. Digital visibility, religious branding and the promotion of prophetic identities can also generate economic value and attract donations, followers and consumers.

The finding that TEI registration creates visibility but does not guarantee accountability is also consistent with nonprofit-governance research. Formal registration can identify institutions, clarify their legal status and establish reporting obligations. Nevertheless, compliance may remain procedural when enforcement and internal governance are weak. Letswalo and Naidoo (2024) show that leader-centred authority can undermine conventional governance systems, while Matshobane and Masango (2018) identify tensions between pastoral authority and accountable church administration. These studies help explain why registration may coexist with weak boards, limited disclosure and concentrated financial control.

South Africa demonstrates both the value and limitations of formal regulation. SARS requirements provide a structured pathway linking tax registration, public-benefit approval and annual returns (SARS, 2024, 2025, 2026). This framework supports institutional visibility and income classification. However, the review found no conclusive evidence that compliance with these formal requirements consistently produces stronger internal controls or congregational accountability. The South African experience therefore suggests that legal design must be accompanied by monitoring, board development, accounting capacity and stakeholder access to information.

Botswana presents a different evidence pattern. Formal societies registration provides organisational recognition, but available research does not establish whether it improves accounting, auditing or tax compliance. Instead, Botswana studies concentrate on prophetic identity, religious marketing and digital influence (Faimau & Behrens, 2016; Ramooki et al., 2024). Nkomazana and Motswapong (2024) show that interfaith organisations can support cooperation and development, suggesting that such bodies could also assist with governance education and regulatory communication. Nevertheless, the lack of direct financial evidence prevents strong conclusions about the effectiveness of Botswana's registration arrangements.

Eswatini's limited evidence confirms the need for locally grounded research. Mbanze (2011) demonstrates that church-established institutions can become legally and financially complex, while Mdluli and Mpofu (2025) emphasise the importance of ethical leadership for legitimacy and accountability. Yet these studies do not establish whether TEI registration improves financial reporting or tax compliance. Regional models from South Africa and Botswana may therefore provide useful lessons, but they cannot simply be transferred to Eswatini without considering institutional capacity, religious diversity, compliance costs and regulatory resources.

The findings support proportionate and risk-based regulation, consistent with FATF (2023). Uniform requirements could impose excessive burdens on small congregations while failing to address the greater risks associated with institutions controlling substantial assets or commercial enterprises. Small religious institutions should therefore maintain basic records and organisational bank accounts, while larger commercialised institutions should classify income, disclose related-party transactions and undergo independent audit or review. Regional coordination through bodies such as ATAF could support common principles for registration, reporting and tax treatment, although national implementation must remain sensitive to local conditions (ATAF, 2023; OECD, 2023).

The literature and review findings collectively show that accountability depends on the interaction among commercialisation, formal identification and governance capacity. Commercialisation creates accountability exposure, TEI activates formal obligations, and governance mechanisms convert those obligations into transparent practice. Where competent boards, reliable records, internal controls and independent review are present, registration may strengthen legitimacy and stakeholder trust. Where these mechanisms are absent, registration may remain symbolic and commercialisation may increase financial opacity, private-benefit risks and public distrust.

Limitations of the Available Evidence

The evidence was geographically uneven, heterogeneous and mostly qualitative. Variable definitions, indirect measures and moderate-to-high bias limit causal interpretation, particularly for Eswatini and Botswana.

Limitations of the Systematic Review

English-language searching, heterogeneous designs and limited access to tax, audit and regulatory data also constrained the review. Narrative synthesis preserved context but prevented pooled estimates. Future reviews should include credible administrative and unpublished evidence.

Implications

Eswatini should consider a TEI framework that combines registration, activity classification, tiered reporting and risk-based oversight (FATF, 2023). Small congregations need simple requirements. Large commercialised institutions should provide enhanced disclosure and independent review. A TEI number improves visibility but cannot guarantee sound management. Accountability also requires independent boards, role separation, organisational bank accounts, internal controls, accurate records and transparent reporting (Letswalo & Naidoo, 2024; Boya & Chiloane-Phetla, 2022).

Implementation should involve religious institutions, the Eswatini Revenue Service, accountants and civil society. Guidance must distinguish donations and exempt activities from employment income, property revenue, related-party transactions and unrelated commercial profits. Accessible registration channels would protect resource-constrained congregations from exclusion (Eswatini Revenue Service, 2025).

Implementation should be studied through baseline, longitudinal and mixed-methods research. Quantitative work should test relationships among TEI, commercialisation, governance, reporting and compliance. Qualitative inquiry should explore how leaders and congregants understand taxation, autonomy and stewardship. Ethical leadership and community engagement remain essential (Mdluli & Mpofu, 2025). A pilot would reveal compliance costs, responses and unintended effects before nationwide adoption.

CONCLUSIONS

This systematic review concludes that commercialisation can strengthen the financial sustainability and contribution of religious institutions, but it also increases governance, taxation and accountability risks. Formal registration or TEI improves legal visibility and can activate recordkeeping, income-classification, reporting and tax-filing obligations. However, it does not independently guarantee accountability. Meaningful improvement requires competent and independent boards, reliable accounting records, institutional bank accounts, internal controls, transparent disclosure and clear separation of donations from commercial revenue. South Africa provides the most developed regulatory model, although implementation challenges remain. Botswana offers formal registration arrangements, but evidence of their financial-accountability effects is limited. Eswatini lacks both an integrated TEI framework and sufficient empirical evidence. Consequently, national reform should be proportionate, consultative and evidence-led. A monitored pilot should precede nationwide implementation and assess compliance costs, institutional capacity, reporting quality, stakeholder responses and unintended consequences while protecting religious freedom and ensuring equitable taxation across commercial activities.

RECOMMENDATIONS

1. Eswatini should pilot an integrated TEI framework linking institutional registration, tax identification, activity classification, recordkeeping, annual reporting and risk-based regulatory monitoring before nationwide implementation.

2. Regulators should adopt tiered requirements. Small congregations should use simplified registration and reporting procedures, while large or highly commercialised institutions should provide detailed financial statements, disclose related-party transactions and undergo independent audit or review.

3. Religious institutions should maintain organisational bank accounts and separate donations, exempt religious income, employment payments, property revenue and unrelated commercial income to improve transparency and tax accuracy.

4. Governing boards should be independent and competent, with clear separation between spiritual leadership, financial authorisation, custody of assets and recordkeeping. Written policies should regulate procurement, remuneration, conflicts of interest and the use of institutional property.

5. Revenue authorities, accountants, civil-society organisations and religious bodies should jointly develop accessible guidance, reporting templates and training on bookkeeping, internal controls, taxation and governance.

6. Future research should use longitudinal and mixed-methods designs, validated accountability measures and evidence from financial statements, tax filings and audits. Country-specific studies should evaluate whether TEI registration produces substantive rather than symbolic compliance.

Limitations of the Study

This review has several limitations. The evidence base was small, geographically uneven and dominated by South African studies, while Botswana and especially Eswatini were under-represented. Most included studies used qualitative, cross-sectional or context-specific designs; consequently, associations between registration, governance and accountability cannot be interpreted as causal effects. Eleven studies had a high risk of bias and eight had a moderate risk, mainly because of weak sampling, limited reflexivity, incomplete methodological reporting and the absence of validated accountability measures. Considerable heterogeneity in concepts, samples, methods and outcomes prevented statistical meta-analysis and required narrative synthesis. The review included only English-language studies and may therefore have excluded relevant regional evidence in other languages. Access to administrative tax records, audited financial statements, regulatory enforcement data and unpublished studies was also limited. Publication bias remains possible because institutions experiencing serious governance failures may be less willing to participate in research or disclose financial information. These constraints require cautious interpretation and restrict the generalisability of the findings.

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