

# Uganda

## Country Focus Report

May 2025



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# A) An Introduction to the Enabling Environment

What we understand by an Enabling Environment is the combination of laws, rules and social attitudes that support and promote the work of civil society. Within such an environment, civil society can engage in political and public life without fear of reprisals, openly express its views, and actively participate in shaping its context. This includes a supportive legal and regulatory framework for civil society, ensuring access to information and resources that are sustainable and flexible to pursue their goals unhindered, in safe physical and digital spaces. In an enabling environment, the state demonstrates openness and responsiveness in governance, promoting transparency, accountability, and inclusive decision-making. Positive values, norms, attitudes, and practices towards civil society from state and non-state actors further underscore the supportive environment.

To capture the state of the Enabling Environment, we use the following six principles:

## SIX ENABLING PRINCIPLES

- 1. Respect and Protection of Fundamental Freedoms**
- 2. Supportive Legal and Regulatory Framework**
- 3. Accessible and Sustainable Resources**
- 4. Open and Responsive State**
- 5. Supportive Public Culture and Discourses on Civil Society**
- 6. Access to a Secure Digital Environment**

In this Country Focus Report, each enabling principle is assessed with a quantitative score and complemented by an analysis and recommendations written by our Network Members. Rather than offering a singular index to rank countries, the report aims to measure the enabling environment for civil society across the 6 principles, discerning dimensions of strength and those requiring attention.

The findings presented in this report are grounded in the insights and diverse perspectives of civil society actors who came together in a dedicated panel with representatives from civil society to discuss and evaluate the state of the Enabling Environment. Their collective input enriches the report with a grounded, participatory assessment. This primary input is further supported by secondary sources of information, which provide additional context and strengthen the analysis.

## Introduction

Uganda's civic space is defined by a complex interplay of political constraints, regulatory clawbacks of constitutionally guaranteed rights and freedoms, and infrastructural challenges. The 1995 Constitution, under Article 29, guarantees the freedoms of speech and expression, assembly, demonstration, association, thought, conscience, and belief — rights that form the backbone of civil society's work. However, these rights are not absolute. Under Article 43, fundamental freedoms can be limited by law if exercised in a way that is contrary to public interest or the rights of others in a free and democratic society, although this cannot be invoked to justify political persecution or detention without trial. Yet Uganda's political environment remains restrictive.

The dominance of the ruling National Resistance Movement (NRM), in power since 1986, has led to a gradual narrowing of democratic space as the political elite increasingly prioritise regime security over actualising the aspirations of the 1995 constitution. Despite the several court rulings requiring that any rights limitation must be necessary, proportionate, and demonstrably justifiable, civil society's ability to operate freely is increasingly constrained by surveillance, censorship, legal repression, and regulatory barriers as the state moves to quell civil and political dissent to its long-term rule.

Elections are regularly held, but they are marred by allegations of violence, voter intimidation, media censorship, and judicial bias. Institutions meant to guarantee democratic accountability, such as parliament, the judiciary, and the Electoral Commission, have been weakened by executive influence. Opposition actors, critical media, and activist groups are regularly surveilled, harassed, or criminalised under vague laws like the Public Order Management Act and the Computer Misuse Act.

As such, civic actors operate in a polarised environment shaped by suspicion, selective enforcement of the law, and shrinking access to funding. State agencies frequently view civil society through a national security lens, particularly in relation to elections, human rights advocacy, and international donor support. At the same time, institutional barriers like complex compliance procedures, regional disparities, and insufficient protection of migrant communities limit civic engagement for grassroots groups, indigenous communities, and special interest groups.

This assessment explores how these factors affect the operational freedom of civil society online. It draws on expert opinions, field interviews, and global indexes such as Freedom House's Freedom on the Net, and recent case law to unpack how policy and practice interact to shape the reality of civic expression, participation, and activism in the year 2024.

## Assessment of the Enabling Environment

Civil society in Uganda continues to play a vital role in shaping public discourse, delivering essential services, and defending rights. Its historical roots stretch deep—from colonial-era missions and mutual aid groups, through post-independence liberation movements, to the contemporary landscape of professional NGOs, grassroots associations, and digital activism. Findings from this assessment reveal a system marked by stark contradictions.

On one hand, the legal framework provides formal recognition of civil society's role, with laws and policies that outline the registration, regulation, and engagement of non-state actors. On the other hand, implementation is inconsistent, with advocacy organisations routinely encountering procedural delays, opaque audits, or arbitrary enforcement. The unevenness of civic participation is not only legal or political, but also geographic and economic.

Civil society in urban centres—particularly Kampala—enjoys relatively easier access to decision-makers, donors, and infrastructure. In contrast, organisations operating in remote or underserved regions face linguistic barriers, poor internet connectivity, and limited institutional support. These disparities are compounded by high operational costs, shifting donor agendas, and declining public trust in formal institutions.

Digital spaces—once seen as an alternative platform for civic expression—have become increasingly monitored and controlled. While youth-led movements and content creators continue to use online tools for mobilisation and commentary, the rise in surveillance, censorship, and legal reprisals has significantly constrained digital freedoms. Offline, traditional civic organising is similarly constrained by security narratives that treat mobilisation as a threat rather than a right.

Despite these challenges, civil society remains active. Youth movements, regional networks, women's collectives, and community groups continue to assert their voice. Across the country, actors continue to mobilise around labour rights, environmental justice, gender equality, social protection, and democratic reform. Even within a shrinking space, civic energy remains visible and adaptive.

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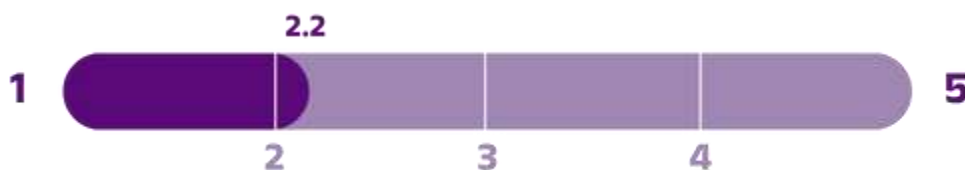


# B) Assessment of the Enabling Environment

## PRINCIPLE SCORE

### 1. Respect and Protection of Fundamental Freedoms

Score: 2.2/5 (Repressed)<sup>1</sup>



#### Dimension 1.1: Freedom of Association— *Legally protected, but unevenly applied*

Uganda's legal framework formally recognises the right to associate through [Article 29 of the Constitution](#). However, the freedom to associate is undermined by regulatory clawbacks and administrative practices that allow for discretionary enforcement. CSOs, particularly those engaged in governance and human rights advocacy, continue to face hurdles in registration, operation, and renewal of permits.

While formal registration is not mandatory for informal associations, many community-based groups find it difficult to function without legal recognition, particularly when seeking funding or engaging with public authorities. The NGO Bureau has improved procedural clarity, yet regional disparities persist. In some districts, local officials impose requirements beyond national law, including letters of recommendation from Resident District Commissioners (RDCs) or local security actors, even though such measures lack legal basis. This creates a chilling effect on smaller, informal groups that lack the capacity or political connections to navigate such barriers.

Further, compliance monitoring is uneven and often politically influenced. Organisations viewed as critical of the government are more likely to face intrusive audits, suspension threats, or deregistration. Despite improvements in stakeholder dialogue between CSOs and

<sup>1</sup>This is a rebased score derived from the [CIVICUS Monitor rating](#) as 30/100 and 'repressed' published in December 2024.

the NGO Bureau, fear of arbitrary closure remains prevalent among rights-based organisations.

### **Dimension 1.2: Freedom of Peaceful Assembly— *Permissible in law, constrained in practice***

While the Constitution guarantees the right to peaceful assembly, its operationalisation is constrained by the [Public Order Management Act \(2013\) \(POMA\)](#), which grants police the power to deny and disperse public meetings (defined as “*a gathering, assembly, procession or demonstration in a public place or premises held for the purposes of discussing, acting upon, petitioning or expressing views on a matter of public interest*”).

Although the Constitutional Court repealed Sections 5 (b) and 10 (3-4) in March 2020—these required organisers to notify police of their intent to hold a public gathering three days before and imposed criminal liability on organisers and participants who failed to comply—police and other security actors still use this law to disrupt public protests. Despite the Minister of Constitutional Affairs’ [attempt](#) to deflect culpability by blaming police for misinterpreting their powers under POMA, state practice shows blatant disregard for the Constitutional Court’s pronouncements, as illustrated by the [violent crackdown](#) of #walktoparliament, a youth-led protest against excessive corruption in parliament.

Civil society actors report that these restrictions are disproportionately applied to governance-focused and opposition-aligned events. In contrast, assemblies supporting government initiatives or hosted by the ruling party proceed without hindrance.

### **Dimension 1.3: Freedom of Expression— *Deteriorating under expanding security and digital surveillance***

Whereas freedom of expression is protected by Article 29 of the Constitution, it is increasingly threatened by legislation that enables surveillance, criminalises dissent, and constrains press freedom. Laws such as the [Computer Misuse Act \(as amended in 2022\)](#) and the [Anti-Terrorism Act \(Act 14 of 2002\)](#) have been used to intimidate activists, human rights defenders, journalists and ordinary citizens who voice critical opinions online or offline.

CSOs working on digital rights note that online civic expression is under [heightened scrutiny](#), with increased surveillance of social media platforms and the use of vague laws to arrest users for “offensive communication”. In an [Amnesty International \(2024\)](#) report, activists, specifically those working on LGBTQIA+ issues, described experiences of doxing, ‘outing’, blackmail, extortion, impersonation, disinformation, harassment, surveillance, and authorised access to their private data. These violations disproportionately affect younger activists and people in rural areas who lack the legal and financial support to defend themselves.

Media freedom remains [fragile](#). Independent outlets are subjected to harassment, licence suspensions, or raids, particularly when covering politically sensitive topics. In February 2024, for instance, police arrested TikToker Ibrahim Musana on charges of defamation and incitement after he allegedly insulted senior leaders on social media (including the President and the Speaker). Journalists have reported that security agents and ruling party officials frequently dictate editorial content, while the government leverages licensing and advertising to silence critical outlets. Many rural radio stations are owned by government officials, restrict political coverage, and are closely monitored by the Uganda Communications Commission and Uganda Police’s Media and Political Crimes Unit. Civil society actors face similar risks. An investigative group that exposed parliamentary corruption early in the year ([#ParliamentExhibition](#)) received threats, sending one contributor into hiding to avoid arrest. Such incidents illustrate how state power is used to constrain civic expression and suppress dissent.

Thus, while Uganda's legal framework affirms civic freedoms, enforcement practices often contradict these protections. The gap between law and practice creates an atmosphere of fear, unpredictability, and risk for civil society actors. Rights are inconsistently respected, disproportionately affecting actors engaged in advocacy and accountability work. A genuine enabling environment will require legal reform and a shift in institutional behaviour to uphold civic freedoms equitably and in good faith.

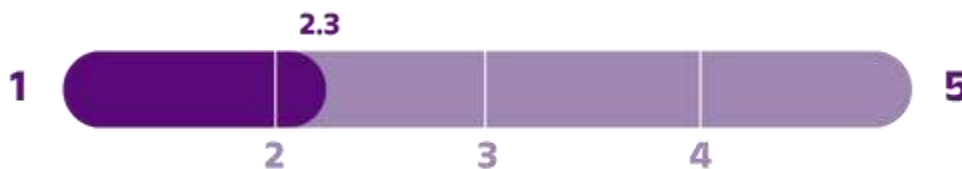




## PRINCIPLE SCORE

## 2. Supportive Legal and Regulatory Framework

Score: 2.3/5



### Dimension 2.1: Registration— *Restrictive, with some enabling elements*

While Uganda's legal framework outlines formal procedures for CSO registration, its implementation is cumbersome, bureaucratic, and inconsistently enforced—particularly for grassroots and rights-based organisations. [The NGO Act \(2016\)](#) establishes the primary regulatory framework for CSO operations and requires all organisations to register, but compliance requires navigating multiple institutions: The Uganda Registration Services Bureau (URSB), the National NGO Bureau, Uganda Revenue Authority (URA), and the Data Protection Office. Each body operates under distinct legislation, demanding duplicative documentation and parallel compliance. For example, a CSO in the Albertine region reported delays exceeding eight months due to contradictory instructions from the NGO Bureau and prolonged URA clearance.

The fragmented and discretionary regulatory system results in CSOs being accountable to multiple overlapping institutions, making compliance an opaque process ladled with excessive paperwork. Discretion in applying the law exacerbates these burdens. Several NGOs with complete renewal applications received permits valid for only one to two years—despite applying for the five-year maximum—without explanation. Appeal mechanisms offer little remedy; an advocacy CSO in Kampala received no response to a formal complaint and was forced to restart the application process. [In a landmark case](#), the High Court upheld the NGO Bureau's refusal to register Sexual Minorities Uganda (SMUG) on grounds of the illegality of their constituencies' sexual orientation, reinforcing selective exclusion.

Particularly for subnational actors, enforcement of registration procedures is opaque, fragmented, and logistically burdensome. Registration is centralised in Kampala, imposing high logistical costs on rural CSOs. Partial digitalisation compounds these barriers; whereas URSB has an online system, the NGO Bureau still demands physical submission, increasing

delays and the chance for discretionary decisions. Outside Kampala, District NGO Monitoring Committees (DNMCs) are often inactive, or members are misinformed about the legal prescriptions for registering community-based organisations (CBOs). Consequently, many CBOs operate unregistered, risking closure during politically sensitive periods.

These compliance burdens disproportionately affect grassroots and rights-based organisations, leaving many legally vulnerable, financially strained, and at risk of arbitrary closure, especially in rural areas where compliance is logistically and institutionally harder to attain.

**Case Study:** Two CSOs in Bunyoro faced significant hurdles in navigating registration and permit-renewal processes, demonstrating how the regulatory framework is implemented through ad hoc relationships and informal workarounds as opposed to formal structures. A network CSO was required to submit over 20 documents, including updated URSB filings, tax clearance from URA, and recommendation letters from the DNMC in every district where it operates—whereas previously a single recommendation from the district of its headquarters was sufficient. Similarly, a district-based HIV-rights CBO reported a total lack of state support in compliance matters.

## **Dimension 2.2: Operational Environment— *Restrictive, with some enabling elements***

The NGO Act (2016) formally recognises a broad spectrum of CSOs (international, national, and community-based) and guarantees autonomy in governance, programming, and operations. However, in practice, this autonomy is systematically eroded by regulatory burdens, bureaucratic hurdles, and discretionary enforcement. One of the more significant operational hurdles is the permit renewal process. Section 32 of the NGO Act requires NGOs to have a valid operating permit, renewable annually within six months before expiry. The Act grants the NGO Bureau discretionary powers to determine approval requirements. CSOs report that the list of demands is ever-growing. Lately, CSOs are required to submit over 20 documents—many duplicative or newly introduced without notice, making the permit renewal process costly, complex and lengthier.

Regional CSOs are more strained as they must secure separate recommendation letters from every District NGO Monitoring Committee (DNMC) in which they operate, even though many DNMCs are not fully functional. Grassroots organisations are disproportionately affected. They are inadequately staffed and resourced, placing them at risk of closure for technical non-compliance. This forces organisations to divert resources away from programming into compliance, yet even compliance does not guarantee certainty; one CSO's permit renewal in 2024 was delayed by three months, and the organisation received a three-year permit instead of the five years requested.

Another major obstacle in CSO operations is the delay in processing MOUs with district governments. Section 42 requires CSOs to obtain DNMC approval and sign an MOU with the local government before commencing district-level activities. In practice, however, MOUs are frequently delayed by the misapplication of rules intended for government contracts. Although the Solicitor General approval is legally required for government contracts above UGX 200M (ca. 48,500 Euros, typically for public procurements, public-private partnerships, and donor-government agreements), this provision is being wrongly applied to NGO MOUs, creating unnecessary bureaucratic bottlenecks that disrupt routine NGO operations.

One positive development in the operating environment is the removal of NGOs from the list of accountable persons under [the Anti-Money Laundering Act \(Amended\) 2013](#). Previously, NGOs were classified as vulnerable to money laundering and terrorist financing, requiring them to file annual financial reports to the Financial Intelligence Authority (FIA), which is also authorised by law to freeze bank accounts of NGOs suspected of money laundering and terrorist financing. In 2021, this provision was weaponised to freeze the accounts of NGOs involved in election observation, effectively disrupting their operations. Following Uganda's

removal from the Financial Action Task Force's (FATF) grey list in March 2024, a coalition of CSOs led by Defenders Protection Initiative (DPI) [successfully lobbied parliament to delist NGOs from the Act](#), marking a significant step towards restoring operational freedom.

Despite the NGO Act recognising CSO autonomy, the operating environment is, in practice, marred by bureaucratic hurdles that disrupt operational continuity, restrict programming, and heighten vulnerability to closure or harassment. This creates a climate of uncertainty that undermines strategic planning and long-term engagement.

**Case Study:** In 2024, a governance-oriented CSO with a strong compliance record submitted a routine 5-year permit renewal request. Despite a timely submission, the NGO Bureau issued only a three-year permit with no explanation. Follow-up attempts were ignored. While legally within discretion, this unexplained shortening introduced operational uncertainty. Notably, repeated demands to resubmit founder details appeared politically motivated, one founder being married to an opposition leader. This suggests that bureaucratic neutrality can mask political interference. Though the framework appears procedurally sound, discretionary enforcement allows regulators to subtly restrict CSO autonomy, particularly for organisations engaged in governance and rights advocacy.

### **Dimension 2.3: Protection from Interference—Restrictive, with systemic vulnerabilities.**

While the NGO Act (2016) does not formally grant security agencies oversight over CSOs, enforcement of the law is, in practice, driven more by political perception than law. The NGO Act (2016) vests regulatory authority in the DNMCs and SNMCs, where District Internal Security Officers (DISOs) and Gombolola (Subcounty) Internal Security Officers (GISOs) sit only as members. This technically limits their role to acting within the collective decisions of committees. Security operatives behave as if they retain the broad enforcement powers granted by the old legal framework. They unilaterally carry out inspections, issue warnings, block public gatherings and field research, and sometimes even order office/workshop closures without DNMC sanction or approval, especially where programming relates to civic education or governance.

One panellist stated that *“the DISO/GISO operate outside the framework of the DNMC and instead operate as single entities, affecting the functioning of the sector”*. Another noted that *“security organs make blanket decisions without evidence to back up their claims”*, reflecting a pattern of arbitrary enforcement not sanctioned by committee deliberation. Given that most DNMCs remain weak or inactive, CSOs are left in a grey zone where security agents hold more sway than civil servants. These testimonies show that despite legal reforms, the legacy of broad security discretion persists. While technically reduced to committee members under the Act, security personnel continue to exercise unilateral control, undermining legal safeguards and chilling civic activity—especially for organisations engaged in governance or rights-based work.

In Karamoja, for instance, a DNMC-approved community forum was blocked by a GISO accusing the organisers of inciting community members to violence. In Kampala, police halted a documentary screening on labour externalisation, despite prior clearance. The Ugandan Communications Commission (UCC) is increasingly using media regulations to suppress dissent, issuing vague directives to broadcasters that encourage self-censorship and portray independent media as partisan threats to state stability. As one interviewed journalist noted, *“the media has become a casualty in the broader ideological war between the state and the opposition”*.

The securitisation of enforcement has had broad-reaching impacts on the operating environment for CSOs. It fosters fear, uncertainty, and self-censorship, discourages civic engagement, and erodes trust between civil society and state institutions. In the absence of strong, impartial regulatory bodies, unchecked interference breeds a culture where compliance is dictated more by political expedience than law.

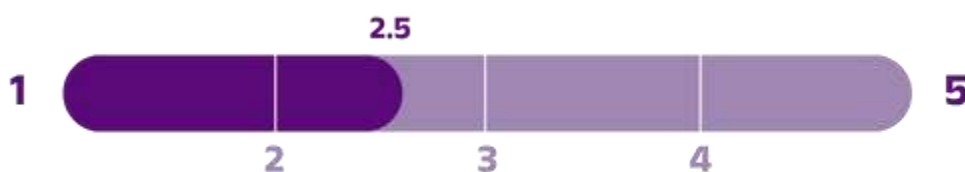
**Case Study:** A national CSO focusing on investigative journalism faced unusual scrutiny during registration and unexplained permit renewal delays. Despite compliance, security agencies blocked events, citing repealed sections of the Public Order Management Act. One such incident involved a public screening of a documentary critical of Uganda's labour externalisation agreements with Middle Eastern countries. Police cancelled the film's launch, citing "unauthorised assembly", even though all necessary permissions had been obtained. Mainstream broadcasters declined to air the documentary and generally avoid critical content, fearing regulatory retaliation. This reluctance follows a UCC directive requiring that all media reports critical of the government include a government response, however, officials frequently decline to comment, leaving journalists no option but to withhold publication or risk punitive action. This policy induces self-censorship across the media landscape.

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## PRINCIPLE SCORE

### 3. Accessible and Sustainable Resources

Score: 2.5/5



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#### **Dimension 3.1: Accessibility—*Limited access due to structural, political, and administrative barriers***

Access to operational funding remains uneven and constrained for the [5,021 NGOs formally recognised in Uganda](#), particularly for grassroots and regional CSOs. The absence of a public civil society fund, limited private sector interest, a motivating fiscal system, and a giving culture focused on familial and religious ties have stunted the growth of local philanthropy. Most CSOs depend heavily on foreign funding, which is increasingly volatile due to embassy downsizing and the closure of pooled funds like the Democratic Governance Facility (DGF).

Even where funding exists, many grassroots CSOs remain excluded due to the mismatch between donor preferences and requirements (such as high visibility, advanced technical systems, or sophisticated digital infrastructure) and local realities. A District Community Development Officer (DCDO) in Western Uganda recounted how several active CBOs were disqualified from a funding scheme by a development partner for lacking audited accounts, functional websites, or grant-writing experience. Donors often prefer INGOs or large national intermediaries, who retain control over design and budget, leaving grassroots partners relegated to logistical roles.

Studies show that Ugandans do give: middle-income households donate up to [2.04% of their monthly income](#). During COVID-19, over UGX 50 billion (ca. 12 million Euro) was [raised locally](#). However, [philanthropy in Uganda](#) remains weakly regulated and poorly understood, with no dedicated legal or policy framework for philanthropy, so it is regulated indirectly through other laws. In 2024, UNNGOF and CivSource [revived calls for a National Philanthropy Policy](#) at the 2024 Gathering of Givers.

Thus, while urban-based and well-resourced CSOs benefit from visibility and compliance infrastructure, grassroots actors remain structurally excluded by stringent donor requirements, deepening fragmentation and fragility in the civic space. In the absence of enabling policy frameworks for local philanthropy, grassroots CSOs struggle to secure access to funding for



their activities, limiting their impact and the sector's contribution to transformative development.

**Case Study:** In the Albertine region, a Hoima-based CSO noted success in accessing sub-grants via INGOs but flagged high compliance costs, such as permit renewal across multiple districts. In neighbouring Kikuube, a grassroots CBO reported missing a health project opportunity due to the lack of a valid permit—still pending amid district-level confusion—and the absence of audited books. Application forms were “long, in English, and online”, limiting accessibility for community actors.

### **Dimension 3.2: Effectiveness—*Compromised by stringent donor conditionalities, power asymmetries, and short-term funding cycles***

The CSOs that can access international funding struggle to use it effectively. Many donors issue 12–18-month grants, making long-term planning difficult. A women's rights organisation had to divide a 3-year advocacy initiative into three short-term grants with inconsistent indicators and reporting formats, creating gaps in programming. Fragmented funding cycles lead to reactive rather than strategic programming.

Even where CSOs demonstrate contextual knowledge and operational capacity, donors often retain disproportionate control over strategy and accountability mechanisms. Donor demands, such as biweekly updates, heavy log frames, and rigid frameworks often require externally defined indicators that strain small and mid-sized CSOs without full-time grant managers.

Several panellists highlighted that donor practices significantly influence internal governance within CSOs, particularly regarding staffing, board composition, and programme direction. One panellist recounted that some donors have required organisations to change board members or staff based on personal disagreements, citing the example of CCEDU, which was advised to restructure its leadership under donor pressure—only later to be denied funding. This sentiment was echoed by another panellist who confirmed that such demands have occurred in other cases as well, illustrating how donor conditionalities can override internal governance autonomy.

Mission drift is another concern. Most donor grants are structured around pre-set priorities and rigid reporting templates, limiting the ability of CSOs to adapt to emerging needs or localised contexts. Several CSOs working in governance and human rights reported needing to reframe proposals around donor-friendly themes. After DGF's closure, a CSO in the Albertine region turned to local mobilisation to keep some projects afloat. They found that while local philanthropists and corporate donors were willing to fund service delivery projects, they were unwilling to work with organisations engaged in governance, prompting them to orient some projects towards youth skilling.

The power imbalance between donors and CSOs creates an environment that incentivises compliance with donor interests over innovation in interventions. When CSOs reshape their agendas to fit externally driven priorities, it diminishes authentic grassroots engagement, undermining their effectiveness as agents of civic interests.

**Case Study:** A Kikuube-based CBO with strong health credentials was excluded from a project implemented by an INGO that selected predetermined partners. Despite local credibility, the CBO “watched from the sidelines”, unable to participate or shape programming priorities. The project's design and funding left no room for grassroots engagement or flexible response to emerging needs.

### **Dimension 3.3: Sustainability—*Limited predictability and donor dependence hinder long-term stability***

Most CSOs in Uganda rely on short-term project-based foreign funding, with minimal access to core or unrestricted support. This limits long-term planning and entrenches fragility. Shifts in global development priorities and funding realignments have further worsened the operating climate. Following the [closure of the Democratic Governance Facility](#) and the global restructuring of USAID, donor support to Uganda has contracted. Panellists report that embassies and international partners have become more risk-averse, especially in relation to governance or rights-based programming.

The closure of DGF, for example, led to hundreds of layoffs, lost offices, and project cancellations, devastating grassroots operation and disrupting civil society organisation as a whole. One CSO couldn't pay rent or salaries for five months and now operates remotely. The situation is more severe for grassroots and subregional CSOs, which often operate on skeletal budgets with limited administrative staff, leading to chronic burnout and poor retention, particularly among younger professionals. Many NGOs are no longer viewed as stable employers and instead operate as volunteer platforms or offer unpaid internships for early-career professionals.

Without institutional funding, most CSOs exist as “project shells”, lacking investment in salaries, infrastructure, or systems. INGOs and national CSOs often monopolise funding consortia, while grassroots partners are relegated to subordinate roles. [Studies](#) show that CSOs in Uganda—particularly those outside Kampala—are financially dependent, experience frequent funding gaps, and remain “malnourished and vulnerable” in the absence of more flexible, core-inclusive funding arrangements. A CBO once running five programmes in the Albertine region is now down to one due to donor withdrawal. Despite demand, its youth mentorship programme remains suspended.

Domestic philanthropy remains underdeveloped due to economic precarity, weak tax incentives, and private sector disengagement. State funding is rare and usually limited to service delivery partnerships. In Karamoja, Teso, and Bunyoro, local organisations often collapse when external funding ends.

The closure of DGF and USAID revealed that Uganda's civil society operates under severe financial precarity. The over-reliance on external funding weakens the sector's resilience and strategic focus, undermining the sustainability of its gains in transformative civic engagement. As major donors withdraw or shift priorities, grassroots organisations face collapse, while national and international actors monopolise resources, reinforcing inequalities in the sector.

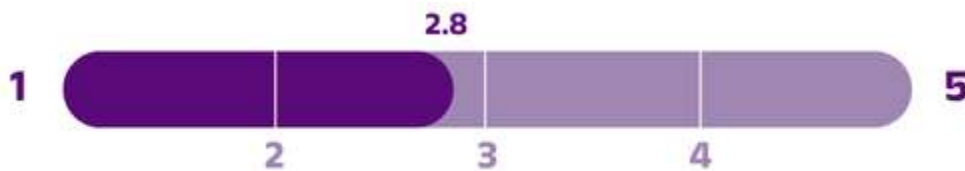
**Case Study:** A labour rights CSO faced layoffs after a key donor blocked its request to charge modest administrative fees on over UGX 1 billion (ca. 242,000 Euro) recovered for legal aid clients. Another donor denied permission to redirect underspent funds toward building offices, insisting the CSO continue paying rent. These restrictions prevented the CSO from building reserves or long-term stability, leaving it exposed to future shocks.

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# PRINCIPLE SCORE

## 4. Open and Responsive State

Score: 2.8/5



### Dimension 4.1: Transparency— *Limited transparency, with significant barriers blocking access to public information*

Uganda's legal framework guarantees access to information through the [Access to Information Act \(2005\)](#), covering all public entities and requiring a 21-day response window. Exceptions apply for national security, privacy, ongoing investigations, or commercial confidentiality. However, implementation remains weak and highly dependent on relationships with state actors. CSOs can sometimes access budgets, contracts, and assessments, but usually through informal networks rather than legal enforcement.

For grassroots CSOs, requests are often ignored or redirected. A Bunyoro-based CBO failed to obtain local health budgets after the District Health Officer passed them to the Ministry of Health, which never replied. Subnational CSOs face repeated delays even when requesting non-sensitive data like service delivery records. Transparency International [ranks](#) Uganda at 140/180 on its 2024 Corruption Perceptions Index, reflecting these systemic failures.

Some progress has been made via digital platforms, like the Ministry of Finance's budget portal or the Auditor General's site, but data is often outdated or partial. A [2024 Infrastructure Transparency Index by CoST Uganda](#) (an Infrastructure Transparency Initiative) showed only 11% improvement from 2023 across 58 infrastructure projects. Transparency tends to be better where CSOs like Civil Society Budget Advocacy Group (CSBAG) partner directly with government actors in budget tracking and monitoring.

Access to information on oil, defence, and infrastructure remains restricted. An [Africa Freedom of Information Centre brief \(2024\)](#) found that only 9% of information requests are partially successful within the 21-day statutory limit. CSOs are often told to get written clearance from the Chief Administrative Officer or the central government, creating bureaucratic dead-ends. In 2019, [Uganda's oil and gas sector scored 45% in a contract transparency study](#), reflecting a long history of opacity despite sustained pressure from journalists and CSOs since the mid-2000s. In 2024, [the Attorney General announced that government is now willing to disclose](#)

[select oil agreements](#), a delayed and limited concession that illustrates how access to information in the sector remains conditional and tightly controlled.

Researchers also face hurdles. Those working on sensitive topics must register with the Uganda National Council for Science and Technology (UNCST) and, at times, obtain clearance from the State House.

**Case Study:** CSBAG's budget transparency efforts illustrate the power of relationship-based advocacy. By cultivating long-term ties with the Ministry of Finance, Planning, and Economic Development (MoFPED), CSBAG regularly contributes to budget consultations and audits. In Kabarole, its local partner built rapport with district staff and accessed health budgets for financial year 2022/23. Despite initial resistance, the CSO facilitated a community dialogue that led to quarterly budget briefs being shared with local CSOs and media partners.

#### **Dimension 4.2: Participation— *Opportunities exist, but participation is often tokenistic and controlled.***

CSOs engage in decision-making through working groups, committee hearings, and district planning meetings. While Uganda lacks a unified public participation law, several statutes—including the NGO Act (2016), [Public Finance Management Act \(2015\)](#), and [Local Governments Act \(1997\)](#)—contain provisions for engagement. However, participation is often symbolic, accepted only when aligned with government interests.

CSO impact is notable in sectors like health, education, agriculture, and gender. CSBAG's success in budget advocacy is recognised in the Ministry of Finance's 2024 Citizens Budget Guide. But influence remains limited. Parliamentary Clerks report that CSO input is mainly welcomed in Sectoral Committees that process Bills and Budgets—such as Health, Finance, Agriculture or Gender—but are generally excluded from politically sensitive Standing Committees such as Accountability Committees which handle sensitive confidential information. With regard to Standing Committees (Especially the PACs) which handle broad, confidential and sensitive information, when invitations are issued for Non-State Actors, preference is given to INGOs or prominent national CSOs.

Consultations often occur too late to shape outcomes, [as seen with the 2024 NGO Bureau Amendment Bill](#), where the NGO sector was not given an opportunity to share its views on the rationalisation process, despite it being mandatory for stakeholders to have such an opportunity during the legislative process (Nile Post 2024).

Urban bias is another issue. CSOs in Kampala enjoy greater access in policy processes, while rural groups face exclusion due to poor notice, logistical constraints, and tokenistic consultation. Sub-county meetings often overlook grassroots submissions in final decisions.

Thus, although Uganda's laws provide for CSO participation in decision-making, engagement is often symbolic or limited to less politically sensitive sectors. Rural and rights-based CSOs face systematic exclusion and last-minute invitations, undermining civil influence in public affairs.

**Case Study:** Karamoja-based CSOs attend district planning forums but are seldom given time to present their service delivery work plans for proper coordination. A misalignment between CSO and government planning cycles and the preference for government-aligned proposals marginalises their input. Well-funded CSOs are prioritised, while others are expected to contribute “hardware” (e.g., infrastructure) regardless of their actual mandate or resources.

#### **Dimension 4.3: Accountability— *Government accountability to civil society is rare, informal, and unstructured.***

Government agencies rarely provide feedback to CSOs on how their inputs influence decisions. Although CSOs participate in consultations and submit proposals or memos,

structured responses or updates are uncommon. Feedback is usually verbal, informal, and depends on individual relationships rather than systemic norms.

Local CSOs report submitting inputs without knowing whether they were considered or adopted. Interviewed officials attribute the lack of formal feedback to time constraints and institutional inertia. Sensitive policy areas—like governance or civic freedoms—are especially opaque.

Several CSOs cited ignored contributions. A reproductive health policy excluded technical input from participating CSOs. The ICT Committee accepted a legal brief on the Computer Misuse (Amendment) Bill but never cited it in its report. A women's rights CSO had its gender-responsive budgeting proposal dismissed for including political participation, deemed off-agenda.

While successes exist, they are rare. Parliament's January 2025 amendment to the Anti-Money Laundering Act to delist NGOs as "accountable persons" followed sustained CSO pressure. In Kaliro District, the local government established a Universal Primary Education (UPE) school to address child labour concerns following community appeals supported by a civil society legal aid provider. However, such instances are exceptions rather than the norm.

The absence of structured government feedback undermines the evidential capture of CSOs' contribution to policy and regulation. It sweeps their inputs in consultations and position papers under the rug, making it difficult to track their contributions to public policy and administrations. This evidential gap fuels narratives that civil society in Uganda is ineffective, contrary to the reality on the ground.

**Case Study:** In Kakumiro, the District Community Development Officer (DCDO) described a largely cooperative relationship between the district government and CSOs, especially in education and health. However, feedback on submitted workplans or policy briefs is inconsistent. Occasional updates via Technical Planning Committee meetings or radio are helpful but informal, leaving CSOs uncertain about their influence or relevance. Critical areas they had been advocating for like financial literacy remain underfunded, indicating a disconnect between CSO programming and local priorities.

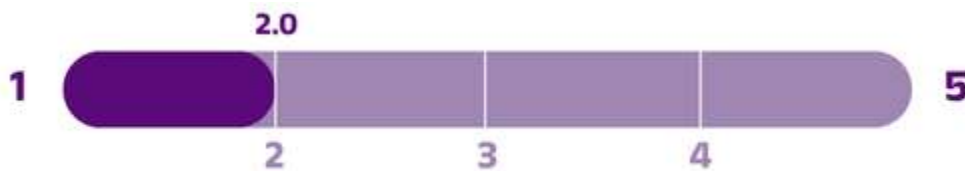
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## PRINCIPLE SCORE

### 5. Supportive Public Culture and Discourses on Civil Society

Score: 2/5



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#### **Dimension 5.1: Public Discourse and Constructive Dialogue—*Public discourse is polarised, limiting space for constructive engagement.***

Public discourse on civil society in Uganda is sharply divided. While the state recognises CSOs as development partners, those in governance and rights-based work are often portrayed as foreign agents or opposition proxies. Security agencies and the Ministry of Internal Affairs frequently frame these organisations as threats to national security. This rhetoric intensified after President Museveni's 2023 [accusation](#) that CSOs were being used to interfere in the internal affairs of the country, which he labelled 'morally and practically wrong.'

Official recognition of CSOs is often symbolic, limited to commemorative events or emergency responses. Media coverage reflects this polarity: private outlets occasionally amplify CSO voices, while state-aligned media often fuels suspicion. With mainstream media space shrinking, CSOs are leveraging digital platforms like Civic Space TV and social media campaigns (e.g., #NGOExhibition, #UgandaParliamentExhibition) to challenge dominant narratives, though these tools have been met with surveillance and smear campaigns.

Positive moments persist. During the 2024 #WalkToParliament protest, CSO solidarity with youth movements received positive reactions on social media. CSOs still access parliamentary platforms and sector working groups, but civic spaces like "Bimeeza" (public debates) remain banned, and political discussions on campuses are heavily restricted.

The framing of rights-based CSOs as opposition proxies or threats to national security is eroding their credibility and constrains their access to (and participation in) institutional platforms. It creates a climate of suspicion that limits their ability to operate openly, engage communities, mobilise resources, and collaborate with government actors, ultimately weakening the civic ecosystem.

## **Dimension 5.2: Public Perception and Civic Engagement—*Trust in civil society is moderate, engagement is constrained by suspicion***

Public trust in civil society is highest for service delivery CSOs—especially in health, education, and livelihoods. In contrast, rights-based CSOs are often seen as elitist, foreign-backed, or politically subversive. Rural civic engagement remains low, especially among youth, women, and marginalised groups. Voter apathy is rising; a Gulu council election, for example, drew only 200 out of 6,000 registered voters—signalling mass disengagement.

Many citizens are unaware of their rights or are disillusioned with CSO effectiveness. Grassroots actors see the civic space as dominated by urban NGOs with limited relevance to local issues. One panellist noted that policy roundtables and hearings mostly feature the same elite CSO networks, creating a perception of civic exclusivity.

Gender and LGBTQI+ CSOs face additional scrutiny. One women-led CSO reported local communities' resistance to its community forums, often driven by male political elites. Since Facebook's 2021 closure, civic participation in online expression has declined, constrained further by surveillance, data costs, and language barriers. The rollout of digital number plates has added to public anxiety, weakening digital activism.

The low trust in rights-based CSOs, coupled with rural disengagement, fear of reprisals, and perceptions of elitism in the civil society space, is shrinking the social base for participatory democracy. It weakens civil society's ability to mobilise inclusive citizen action against the socio-political issues impacting quality of life for the everyday citizen.

**Case Study:** In Karamoja, a governance-focused CSO observed that youth perceive CSOs mainly as providers of jobs or material aid. Rights-based programmes see poor turnout unless accompanied by tangible benefits.

## **Dimension 5.3: Civic Equality and Inclusion—*Legal guarantees exist, but political, structural, and cultural barriers persist***

Uganda's Constitution (Art. 32), and laws like the [Equal Opportunities Act \(2007\)](#), promote civic inclusion. Reserved parliamentary seats and schemes like Uganda Women's Entrepreneurship Programme, Youth Livelihood Programme, and the PWD Fund reflect this intent. However, affirmative action has yielded limited systemic change.

As of 2024, women held 34% of seats in Uganda's 11th Parliament, with 146 district-level seats constitutionally [reserved for women](#). Many reserved seats have become the domain of long-serving incumbents, such as Hon. Rebecca Kadaga, who has held the Kamuli Woman MP seat since 1996, raising [concerns](#) over whether affirmative action is advancing inclusion or entrenching political patronage.

The costs of political participation exclude poor and rural actors. Youth CSOs raising concerns about government projects face accusations of "unpatriotism." Women's rights groups face disruption and surveillance for empowering female leaders. Intersectional exclusion remains acute, especially for rural women with disabilities.

Despite gender and equity budgeting mandates, equal opportunities programmes [remain underfunded](#). Consultations rarely adapt to include marginalised voices. [Ethnic minorities](#) like the Batwa and Benet remain politically invisible. Public attitudes toward LGBTQI+ persons have deteriorated since the [Anti-Homosexuality Act \(2023\)](#), discouraging CSOs from working on inclusion for fear of state retaliation.

The prevalence of political, structural, and cultural interests over constitutional protections for marginalised groups (especially invisible groups such as indigenous communities) undermine genuine participation in civic space. These dynamics restrict civil society's ability to advance

inclusive representation, protect vulnerable communities, and challenge entrenched power structures to improve the lives of underserved communities.

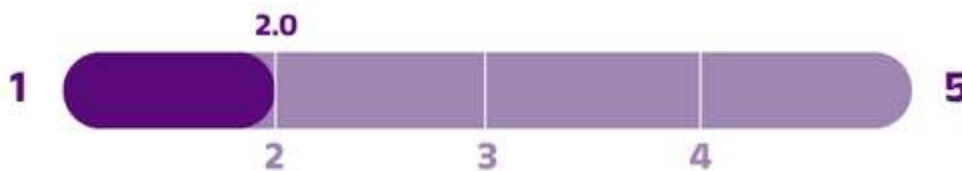
**Case Study:** The Benet, an Indigenous group in eastern Uganda, has faced repeated violent evictions from ancestral lands. Despite Article 32's provision of affirmative action for historically displaced groups, and a [2005 court ruling](#) recognising the Benet's historical association with Mount Elgon, the Ugandan government does not officially recognise indigenous groups. They have no representation in parliament or local councils. As a result, they are often excluded from consultation in decisions that most impact them. Between October 2022 and November 2023, Uganda Wildlife Authority has carried out [raids](#) on displaced communities, destroyed homes, livelihoods, and undermined food security. Resettlement plans into refugee camps show continued state disregard for Indigenous status and ancestral land rights. Efforts to voice grievances by the Benet Mosop Community Association have been met with threats and arrests. This marginalisation reinforces their political invisibility, the denial of land and identity, and representation reinforces exclusion from the democratic processes.

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## PRINCIPLE SCORE

### 6. Access to a Secure Digital Environment

Score: 2/5



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#### **Dimension 6.1: Digital Rights and Freedoms—*Despite legal protections, surveillance and repression restrict online expression.***

Whereas there are no express provisions protecting internet freedoms in Uganda, Article 29 of the Constitution protects freedom of speech and expression (which includes freedom of the press and other media forms) and freedom of peaceful assembly and association (which includes participation in online forums), while Article 27 prohibits unlawful search and interference with correspondence. These rights extend to the online environment; however, despite constitutional guarantees, Uganda's digital landscape remains highly repressive. [Freedom House's Freedom of the Net report \(2024\)](#) notes that surveillance, regulatory overreach, and high costs foster self-censorship and limit civic expression. While no internet shutdowns occurred in 2024, Facebook remains blocked since 2021 and new alternatives like TikTok, YouTube, Instagram, and X (formerly Twitter) are heavily monitored. Pressure on platforms has intensified following a [2019 UCC directive](#) requiring all Ugandan platforms publishing content online to register. In 2024, the Uganda Communications Commission (UCC) reiterated this demand, threatening closure for non-compliance.

The [2017 amendment to the Uganda Communications Act](#) removed the requirement of parliamentary approval of regulations drafted by the Minister of Information and Communications Technology, effectively centralising regulation of communications in the executive branch. As the Act's implementing authority, this gives the UCC unchecked authority to issue and enforce regulations without needing parliamentary consent, raising concerns about arbitrary directives, suppression of dissent, and constraints on freedom of expression.

Several other laws constrain free expression and assembly online, as well as digital privacy: the [Computer Misuse \(Amendment\) Act Cap 96](#) criminalises "malicious information", unsolicited content, misuse of social media and hate speech, with violations leading up to seven years' imprisonment; the [Anti-Terrorism Act 2002](#) has broad definitions of terrorism that grant sweeping surveilling powers that risk criminalising legitimate online activism or dissent; while the [Regulation of Interception of Communications Act \(RICA\), 2010](#) authorises

interception of electronic communications with limited oversight, threatening personal privacy and digital speech.

In combination, these laws create a chilling environment where online criticism, civic engagement, or creative expression may be interpreted as criminal or subversive. This fosters self-censorship and constrains the use of digital platforms for advocacy, mobilisation, and public accountability.

**Case Study:** TikTok Edward Awebwa was sentenced to six years in prison in March 2024 for “hate speech” under cyber laws after criticising the President. Lacking legal representation, he pleaded guilty and was convicted on four counts. His case exemplifies the criminalisation of online dissent and the state’s growing use of cyber laws to suppress expression.

### **Dimension 6.2: Digital Security and Privacy—CSOs face growing digital threats amid weak enforcement of privacy protections**

The [Data Protection and Privacy Act \(2019\)](#) remains poorly enforced. CSOs—especially in rural areas—face growing threats from surveillance, hacking, and metadata collection under the Regulation of Interception of Communications Act (2010). Pegasus spyware has [reportedly been used](#) to target journalists and opposition figures. An Israeli firm, [Cellebrite](#), [has also confirmed](#) selling phone-hacking tools to the Uganda Police.

CSOs report phone tapping, suspicious emails, and surveillance by covert security agents. SIM registration, digital number plates (2024), and local-level surveillance by GISOs and PISOs have heightened digital vulnerability. [Fake social media accounts](#) linked to the Government Citizen Interaction Center (GCIC) spread disinformation and threats to journalists and activists.

The net effect of expansive cyberlaws, unchecked regulatory powers, and growing digital surveillance is that it creates a climate of fear that stifles online expression and weakens civic engagement.

**Case Study:** A Kampala-based investigative outlet faced doxing campaigns targeting its Executive Director. Private emails were leaked, while pseudo social media accounts launched smear attacks labelling the organisation’s founder a foreign agent. While the organisation’s cybersecurity has held off breaching attempts, online trolling and disinformation persist as tools of suppression.

### **Dimension 6.3: Digital Accessibility—High costs and infrastructure gaps limit meaningful digital access for CSOs**

Internet penetration reached [27% in 2024](#) (13.3 million users). Still, 73% of Ugandans remain offline. Uganda ranks [115/121 globally](#) in internet affordability, while its internet costs are the highest in East Africa, with 1 GB costing USD 1.11 (UGX 4000), compounded by 12% excise duty, 18% VAT, and a 5% digital services tax.

Rural CSOs rely on mobile hotspots, which are unstable. Many use personal smartphones due to a lack of ICT infrastructure. Language, disability access, and low digital literacy further restrict inclusion. Most digital literacy training is donor-driven and episodic.

Despite growing internet penetration, Uganda’s digital landscape remains profoundly unequal and exclusionary. With only 27% online, digital accessibility is low for most Ugandans, preventing meaningful online engagement and access to information.

**Case Study:** A regional CSO network improved internal operations using WhatsApp, Teams, Zoom, and QuickBooks. However, outreach remains limited by network quality, subscription fees, and digital literacy among grassroots communities. Despite donor-funded upgrades—



including a full-time ICT officer—attempts to digitise services still face cyber threats and a sharp urban-rural divide.



# C) Recommendations

## **To the Government of Uganda:**

- i. Review and amend restrictive legislation such as the NGO Act (2016), Public Order Management Act (2013) and Computer Misuse Act (2011) to align with constitutional and international standards on freedom of association, assembly, and expression.
- ii. Clarify and standardise NGO registration and operational requirements, especially at the local government level, to prevent arbitrary enforcement and bureaucratic overreach.
- iii. Establish routine, inclusive consultative forums where civil society, including dissenting voices, can contribute to policy dialogue and programme design without fear of reprisal.
- iv. Strengthen the enforcement of digital privacy protections. Cease unlawful surveillance, arbitrary internet shutdowns, and state-led disinformation campaigns targeting civil society actors.

## **To Regulatory Bodies:**

- i. Issue clear public guidelines on registration, permit renewal, and compliance expectations for CSOs at all levels.
- ii. Streamline coordination between national and district-level actors to improve service timelines, reduce conflicting instructions, and uproot the practice of charging extra-legal fees for compliance support.
- iii. Create regular, structured engagement platforms between regulators and CSOs to discuss compliance, policy, and operational challenges in a constructive manner.

## **To Civil Society Organisations:**

- i. Improve transparency and downward accountability through participatory planning, regular reporting to communities, and public performance data.
- ii. Enhance organisational capacity to navigate legal restrictions by building internal legal expertise and/or formal alliances with legal aid organisations.
- iii. Develop national and regional coalitions to amplify advocacy, pool resources, and strengthen negotiating power with government and donors in defending shrinking civic space.
- iv. Reduce dependency on international donors by diversifying income streams through local philanthropy, social enterprise models, and earned revenue (where possible).

## **To Development Partners and Donors:**

- i. Provide long-term, core funding and streamline grant requirements to be accessible to grassroots organisations, especially those in rural and underrepresented regions.
- ii. Elevate the role of intermediary national organisations in sub-granting and capacity strengthening to increase support for CSO initiatives that reflect local priorities and cultural contexts.

- iii. Strengthen protection mechanisms for civil society actors by funding emergency support, legal aid, and relocation mechanisms for CSOs, journalists, and activists facing repression or threats.
- iv. Invest in strengthening capacity for evidence-based advocacy by supporting civil society research initiatives to generate data systems and independent evidence for public policy and social accountability.

**To the Media and Academia:**

- i. Media institutions should invest in legal training, digital security, and solidarity mechanisms to protect journalists covering civil society and governance issues.
  - ii. Academic institutions should promote public education and civic dialogue and provide platforms for evidence-based debate on civil society's role in Uganda's development.
  - iii. Amplify grassroots voices by documenting the experiences and challenges of underrepresented civic actors through academic research and investigative journalism on civic work beyond Kampala.
-

## D) Research Process

Each principle encompasses various dimensions which are assessed and aggregated to provide quantitative scores per principle. These scores reflect the degree to which the environment within the country enables or disables the work of civil society. Scores are on a five-category scale defined as: fully disabling (1), disabling (2), partially enabling (3), enabling (4), and fully enabling (5). To complement the scores, this report provides a narrative analysis of the enabling or disabling environment for civil society, identifying strengths and weaknesses as well as offering recommendations. The process of drafting the analysis is led by Network Members; the consortium provides quality control and editorial oversight before publication.

For Principle 1 - which evaluates respect for and protection of freedom of association and peaceful assembly - the score integrates data from the [CIVICUS Monitor](#). However, for Principles 2–6, the availability of yearly updated external quantitative indicators for the 86 countries part of the EUSEE programme are either limited or non-existent. To address this, Network Members convene a panel of representatives of civil society and experts once a year. This panel uses a set of guiding questions to assess the status of each principle and its dimensions within the country. The discussions are supported by secondary sources, such as [V-Dem](#), the [Bertelsmann Stiftung Governance Index](#), the [RTI Rating from the Centre for Law and Democracy](#), and other trusted resources. These sources provide benchmarks for measuring similar dimensions and are complemented by primary data collection and other secondary sources of information available for the country. Guided by these deliberations, the panel assigns scores for each dimension, which the Network Members submit to the Consortium, accompanied by detailed justifications that reflect the country's specific context. To determine a single score per principle, the scores assigned to each dimension are aggregated using a weighted average, reflecting the relative importance of each dimension within the principle. This approach balances diverse perspectives while maintaining a structured and objective evaluation framework.

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