EU SEE

SUPPORTING
AN ENABLING ENVIRONMENT
FOR CIVIL SOCIETY

Uganda

Country Focus Report

2026





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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:



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.

Reporting period covered: May 2025 – May 2026

Brief Overview of the Country Context

In Uganda, the operating environment in the 2025–2026 period was shaped by a combination of political transition, regional instability, and tightening fiscal and development-finance conditions. Electoral competition heightened political sensitivities; regional conflicts increased humanitarian demand; fiscal and donor pressures reduced available resources; and technological change created both new opportunities and inequalities.

Politically, the reporting period was dominated by the pre-electoral and electoral process of the 15 January 2026 general elections. Electoral competition intensified scrutiny of opposition parties, journalists, human-rights defenders and organisations working on elections and accountability. The period was marked by arrests, restrictions on political activity, suspension of several civil-society organisations and a nationwide internet shutdown. Post-election, tension continued with reports of large-scale arrests of opposition supporters dominating media coverage, while opposition groups and human-rights organisations reported abuses and politically motivated detentions. The election period formed an important backdrop to civic space developments in freedom of association, assembly, expression and digital rights assessed in this report.

The economic situation was more mixed. Uganda recorded relatively strong growth of 6.3% in FY2024/25, while inflation remained below 4%. Strong coffee exports and capital inflows also improved the external position. At the same time, however, fiscal pressures increased: the overall budget deficit widened to about 6% of GDP, public debt reached 52.4% of GDP, and rising interest payments constrained fiscal space. These pressures mattered for civil society because they coincided with reductions in international development assistance and a continuing shortage of reliable domestic sources of civic financing.

Regional conflict added a substantial humanitarian dimension. Violence in the Democratic Republic of the Congo, South Sudan, and Sudan continued to drive displaced persons into Uganda. By August 2025, Uganda was hosting approximately 1.93 million refugees, with an average of about 600 new arrivals per day during 2025. More than half of the refugee population is under 18. At the same time, Uganda's refugee response was only about 25% funded, forcing humanitarian agencies and civil-society partners to reduce assistance even as needs increased. This placed additional pressure on NGOs, community organisations, and host communities involved in humanitarian response, education, health, protection and livelihoods.

These pressures coincided with a wider contraction in international development financing. Funding reductions in 2025 affected health, humanitarian, governance and civic programmes, reducing staffing and programme continuity among organisations that had long relied on external assistance. The result was a dual pressure on civil society: demand for its services and advocacy increased, while the resources available to meet that demand became less predictable.

Uganda's broader development context also remained highly uneven. Expanding mobile connectivity, digital public services, and emerging technologies created new opportunities for organising, communication, and service delivery, but significant gaps persisted in affordability, digital skills, and rural access. Similarly, formal mechanisms for citizen participation continued to exist through local government, planning, budgeting and parliamentary processes, but their accessibility and influence varied considerably.

These overlapping dynamics shaped not only the regulatory environment for CSOs but also their capacity to obtain resources, engage institutions, reach constituencies and sustain their work. The enabling environment examined in this report must, therefore, be understood within this wider context.

Uganda’s civil society operating environment remains largely disabling. CSOs can still form, operate, mobilise resources, engage with government and participate in public and digital spaces, but these activities have become less predictable and, in some areas, more difficult. Across the assessment, the clearest pattern is the gap between formal protections and their implementation: laws, institutions, and consultative spaces exist, but they do not consistently provide secure or equal conditions for civic action.

The regulatory environment is particularly burdensome. Registration remains possible, yet organisations must navigate multiple institutions, recurring permit requirements, and district-level compliance obligations. These pressures are compounded for organisations working on governance, elections, accountability and human rights, as they face greater regulatory scrutiny and a higher risk of interference.

Access to resources is similarly constrained. External funding has become less reliable, while domestic philanthropy and alternative financing remain too limited to compensate fully. Smaller and grassroots organisations are particularly disadvantaged by short funding cycles, weak cost recovery, and complex donor requirements. At the same time, some progress is visible through local fundraising, community philanthropy, and more flexible funding models.

Government openness is uneven. Budgeting, national planning and some sector processes provide meaningful opportunities for CSO participation, but consultation is not always timely and feedback mechanisms remain weak. Public discourse also varies according to the type of civil-society activity: service-delivery organisations are more often treated as development partners, while advocacy organisations can be portrayed as partisan or externally influenced.

The digital space reflects the same contradiction. Mobile and internet infrastructure continue to expand, but affordability, accessibility, surveillance concerns, online prosecutions and the January 2026 internet shutdown restrict the security and inclusiveness of digital participation.

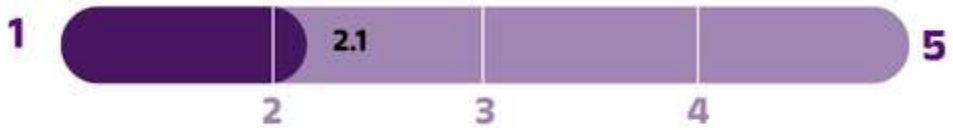
Overall, Uganda retains a resilient civil society, but the environment in which it operates is increasingly marked by regulatory uncertainty, financial fragility, selective openness and uneven protection of civic freedoms.

B) Assessment of the Enabling Environment

PRINCIPLE SCORE

1. Respect and Protection of Fundamental Freedoms

Score[1]:[2]



Dimension 1.1: Freedom of Association— *Legally protected but vulnerable to restriction*

Freedom of association is constitutionally protected in Uganda, but the exercise thereof is becoming considerably less secure, particularly for organisations and groups involved in governance, elections, and politically sensitive advocacy. Article 29(1)(e) of the Constitution of the Republic of Uganda, 1995 guarantees the freedom to form and join associations, trade unions, political parties and other civic organisations. Thousands of NGOs, community organisations, professional bodies and political organisations continue to exist and function, while constitutional protection of association remains intact. The difficulty is that these protections coexist with regulatory and security powers capable of substantially interrupting collective civic activity.

On 9 January 2026, the NGO Bureau suspended the operating permits of several prominent organisations working on human rights, governance, election finance, media freedom and constitutionalism. The CIVICUS Monitor identified those affected, including Chapter Four Uganda, the Alliance for Election Finance Monitoring, Human Rights Network for Journalists-Uganda, Uganda National NGO Forum, Centre for Constitutional Governance, National Coalition of Human Rights Defenders Uganda, and the African Centre for Treatment and Rehabilitation of Torture Victims.

The affected organisations work on constitutional governance, election finance, journalists' rights, torture rehabilitation, and protection of human-rights defenders, among other fields.

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[1] *Scores are on a five-category scale defined as: fully disabling (1), disabling (2), partially enabling (3), enabling (4), and fully enabling (5).*

[2] *This is a rebased score derived from the CIVICUS Monitor rating published in December 2025.*

The Bureau cited unspecified intelligence and alleged activities prejudicial to Uganda's security and laws under section 42(d) of the Non-Governmental Organisations Act, 2016. The organisations were ordered to cease operations while investigations continued, with no defined timeframe. Authorities also restricted their banking transactions, resulting in suspended programmes, office closures, and disrupted payments to staff and service providers.

The affected CSOs remained legally constituted, but suspension of their permits and access to operational funds prevented members and staff from collectively pursuing their civic mandates. Given that it was immediately before an election, the measures also had heightened consequences for organisations working on accountability and elections. This episode captures the contradiction in Uganda's associational environment: the right to association exists in law, but regulators have broad discretionary powers to restrict it.

Case Study: Restriction on political freedoms
The Constitution of Uganda separately guarantees the right to form political parties and political organisations. However, civic and political association remains restricted in practice. In August 2025, police in Mityana used tear gas to disperse supporters of the People's Front for Freedom as they marched to inaugurate the party's first sub-regional offices in Buganda. Police maintained that the procession had not been authorised. The CIVICUS Monitor also documented the continued detention and prosecution of opposition figures in 2025, including Kizza Besigye, whose lawyers challenged his prolonged pre-trial detention on constitutional grounds. Government authorities maintained that these cases concerned legitimate criminal charges, while opposition groups and rights organisations argued that the prosecution constrained political activity.

Dimension 1.2: Freedom of Peaceful Assembly— *Peaceful protest faces violent suppression*
Uganda's Constitution expressly protects the right to assemble and demonstrate peacefully and unarmed and to petition. Judicial decisions have also progressively limited statutory restrictions on this freedom: In the case Human Rights Network Uganda & Others v Attorney General (2020), the Constitutional Court invalidated section 8 of the Public Order Management Act, 2013, in March 2020, holding that broad police powers to prevent or disperse public meetings were inconsistent with constitutional protections. In Uganda v Lule and Others (2023), the Court further held that criminal penalties for participation in peaceful but unauthorised assemblies violated article 29 of the consititution.

Despite these safeguards, the CIVICUS Monitor documented ongoing arrests and excessive force during demonstrations. Environmental activism remained particularly exposed. Twelve anti-EACOP activists, eight of them students, were arrested on 1 August 2025 while protesting against the East African Crude Oil Pipeline and charged with public nuisance. Their applications for bail were repeatedly rejected, and in November, a Kampala court authorised their trial to proceed. The prolonged criminal proceedings illustrate how participation in protest can have consequences extending well beyond the demonstration itself. The cumulative effect of arrest, detention, and eventual prosecution carries considerable personal and legal costs.

Restrictions intensified during the 2026 election campaign. The CIVICUS Monitor, drawing on documentation by Amnesty International, reported security-force interventions at opposition campaign gatherings in several locations, including Kawempe and Iganga. Tear gas, pepper spray, batons, wires and police dogs were reportedly used to disperse gatherings. In Kawempe, the use of tear gas and pepper spray to disperse crowds caused people to fall into a ditch, while in Iganga at least one person was reportedly killed during an incident in which security forces opened fire as demonstrators attempted to leave. Authorities stated that some opposition supporters had attacked police and damaged vehicles; rights organisations disputed aspects of these accounts and argued that force had been used against peaceful protesters.

The fundamental issue is not the absence of legal protection. Uganda's Constitution and courts provide significant safeguards. However, arrests, prolonged prosecutions, and forceful

dispersal mean that individuals cannot consistently exercise their right to peaceful assembly without risk, especially on issues of environmental advocacy, opposition politics, and elections.

Case Study: Police block environmental education gathering
On 3 August 2025, police prevented the Every Birthday Tree Day Initiative from holding an environmental awareness gathering at Nabweru playground in Nansana. The event was intended to train community coordinators, distribute seedlings, and promote tree planting rather than stage a protest or political demonstration. Participants from several districts had already assembled when police sealed the venue. Organisers maintained that they had paid for the venue, obtained local council endorsement, and formally notified police in advance. Nevertheless, Police insisted that the gathering required approval from the Inspector General of Police and treated it as unlawful because that clearance had not been obtained. This incident spotlights how restrictions on peaceful assembly can be imposed even in non-protest conditions where the imperative to preserve public order can be argued as a justifiable exception. Meetings, trainings, community mobilisation and public-awareness events are routine methods through which CSOs exercise freedom of assembly, yet administrative interruptions of police-clearance requirements can be used to block them.

Dimension 1.3: Freedom of Expression— *Active public debate is under substantial pressure*
Freedom of speech, expression, the press and other media is guaranteed by article 29(1)(a) of the Constitution. Uganda retains an active media sector and vigorous political discussion across radio, television, newspapers and digital platforms. Nevertheless, the CIVICUS Monitor documented significant interference in the activities of journalists, activists, and in online expression, particularly as the 2026 elections approached. Journalists experienced pressure from both state and non-state actors during the reporting period, including physical assault, digital insecurity and restrictions on access to public institutions. In August 2025, journalist Christopher Semalemu Ssemakula was severely assaulted by a mob while reporting on a land dispute in Kampala; his phone, camera and other equipment were taken. Other journalists were injured while covering politically sensitive events, reinforcing concerns that reporting in the public interest can carry significant physical risks.

On 5th January 2026, the government prohibited live broadcasts of riots, unlawful processions and violent incidents, arguing that live transmission could heighten tensions and spread panic. On 13th January, the Uganda Communications Commission ordered a nationwide suspension of public internet access, affecting social media, messaging, email, web browsing and streaming two days before voting. Authorities cited misinformation, electoral fraud risks, incitement and national security. The shutdown affected social-media platforms, messaging applications, email, ordinary web access and video streaming, with exemptions for a limited group of essential services.

The CIVICUS Monitor characterised the shutdown as an attempt to silence dissent. The measure affected journalists, CSOs, election observers, political actors, businesses and ordinary citizens at the point when demand for timely electoral information was particularly high, illustrating how quickly common channels of expression and information can shrink. While freedom of expression is neither extinguished nor uniformly restricted, media exclusion, arrests associated with expression, digital restrictions and the election-period internet shutdown produce a substantial chilling effect that constrains free expression.

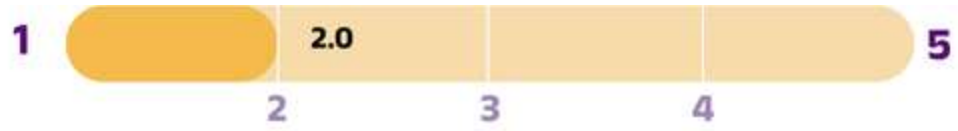
Case Study: Systematic restriction of independent journalism
Restrictions became more systematic during the election period. From March 2025, journalists working for Nation Media Group-Uganda (NMG), including *NTV Uganda* and the *Daily Monitor*, were denied access to events involving President Yoweri Museveni. State House Deputy Presidential Press Secretary Farouk Kirunda publicly stated that President Museveni had personally directed that NMG journalists should not cover his activities, citing what he described as persistent misreporting. In October, the restrictions widened when NMG journalists were prevented from entering Parliament despite holding accreditation. Security personnel reportedly told journalists that they were acting on instructions and withdrew

parliamentary press accreditation from journalists attached to *NTV Uganda*, the *Daily Monitor*, Spark TV, KFM and Dembe FM. The affected outlets form one of Uganda's largest independent media groups, and the restrictions occurred during the months immediately preceding the January 2026 general elections.

PRINCIPLE SCORE

2. Supportive Legal and Regulatory Framework

Score[3]:



Dimension 2.1: Registration— *Open, but layered and increasingly constrained by new barriers to formation and permit renewal*

Uganda retains a functioning legal system through which civil society organisations can register and acquire legal status. Part VIII of the Non-Governmental Organisations Act, 2016 CAP 109 (as consolidated 30 September 2024) stipulates clear rules and procedures for registration, licensing, exemption and deregistration of an NGO, as well as safeguards against illegitimate denial. The regulator must give reasons when registration is refused, and organisations may seek review of permit decisions. Technically, registration is therefore possible in both law and practice; as of 30th June 2025, there were 6,955 NGOs on the national register (JLOS), and 1199 NGO permits were issued (594 new, 589 renewals, 8 reviews and 11 replacements) in the 2024/2025 financial year. However, the drop in the number of registered NGOs - from 14,000 in 2019 - tells a different story.

The process of registering an NGO is encumbered by several layers of approval, documentation, and a heavily bureaucratic dual setup that makes registration disabling in practice. NGOs must register with the Uganda Registration Services (URSB) for corporate personality, and then with the NGO Bureau for operational rights, a process in which NGOs must satisfy 16 listed requirements, including securing ministerial recommendations and individual agreements with local governments to operate or move between districts. In addition, NGOs must submit governing documents, workplans and budgets, founder identities, and disclosure of funding sources.

Despite the development of an e-service portal, NGOs are still required to submit their documentation in hard copy. This process is centralised. With the absence of regional structures and most District NGO Monitoring Committees (DNMCs) being non-functional, up-country CSOs incur high costs in travelling to Kampala to register. The NGO Bureau gives little guarantee of swift completion given its recent reabsorption (2024) into a department of

[3] *Scores are on a five-category scale defined as: fully disabling (1), disabling (2), partially enabling (3), enabling (4), and fully enabling (5).*

the Ministry of Internal Affairs, which has reduced its staffing and capacity to process large volumes of documents in a short time. The International Centre for Non-Profit Law's (ICNL) Civic Freedom Monitor describes this status quo as burdensome, restrictive, and a barrier to CSO formation.

The recent enactment of the Protection of Sovereignty Act, 2026 (Act 7 of 2026) is yet another barrier to CSO formation. Signed into law on 17 May 2026, the Act establishes a separate system for the registration of individuals and organisations qualifying as 'foreign agents'. Most CSOs in Uganda depend on foreign funding. The Act's definition of a foreign agent - 'a representative or employee of a foreigner who acts on the order, request, supervision or under the direction or control of a foreigner, while being financed or subsidised by a foreigner (Section 2)' - effectively brings them under its scope. For qualifying CSOs, this creates the prospect of registration under a third legal regime in addition to URSB and NGO registration. Under section 14 of the Act, qualifying CSOs will be required to submit a formal application (to the Minister of Internal Affairs) disclosing their identity and their foreign principals' (donor) data, and undergo exhaustive security background checks to receive a certificate of registration that must be renewed every two years.

Case Study: The Debate on the Protection of Sovereignty Bill
The parliamentary debate on the Protection of Sovereignty Bill, 2026 illustrates a significant shift in the regulatory climate surrounding CSO formation. In its April 2026 report, Parliament's Joint Committee on Defence and Internal Affairs and Legal and Parliamentary Affairs recorded that the law sought to address the 'inadequate regulation of civil society organisations'. The Attorney General argued that itwas intended to target structured foreign influence rather than ordinary international engagement; however, the Committee found that its broad definitions would capture lawful civic, commercial, academic and professional activity, and that the proposed framework would have created a parallel registration and monitoring system that risked creating a permission-based legal system that depended heavily on ministerial approval rather than clear, predictable rules. Opposition from the private-sector and financial actors eventually forced the state to reduce ministerial approvals and protect legitimate business, academic, humanitarian and civic activity in the versionthat was passed into law. However, this reveals a shift towards treating foreign-supported CSOs as a potential sovereignty risk. While CSOs can lawfully register, this change in regulatory logic signals a shift from administrative registration to security-oriented permission and scrutiny, creating an additional barrier to entry in practice.

Dimension 2.2: Operational Environment— *Autonomy is increasingly shrinking under tightening state control.*
CSOs in Uganda retain formal autonomy over their internal governance, programmes, and objectives. However, complex compliance procedures and a legal framework that gives regulators broad discretionary powers complicate the practical conditions under which organisations remain operational. The divide between service-delivery CSOs and advocacy CSOs working on issues such as governance, human rights, and election monitoring remains vast. Service-delivery CSOs continue to enjoy greater autonomy and lower regulatory scrutiny; advocacy CSOs are increasingly subjected to tighter regulatory scrutiny and conditional autonomy.

In general, the heavy compliance burden and discretionary enforcement continue to constrain the operating environment for CSOs. Current NGO permit requirements include audited financial statements, annual reports, work plans or strategic plans, governing-body minutes, founder identification, a recommendation from every relevant District NGO Monitoring Committee, certified district Memoranda of Understanding, Financial Intelligence Authority registration, a Uganda Revenue Authority Tax Identification Number, Data Protection Office registration and beneficial-ownership particulars filed with the Uganda Registration Services Bureau. An NGO operating after a permit has expired is liable to a monthly fine of UGX 2 million (ca. 450 Euro).

One concerning development is the growing securitisation of the sector. When the NGO Act (2016) came into force, the NGO Bureau was created as a semi-autonomous agency because

the government recognised that the sector had grown in number and in diversity, and therefore needed specialised expertise to coordinate relations between the state, the sector, and citizens. The reabsorption of the Bureau into the Ministry of Internal Affairs in April 2024 reverses this logic.

Although the government claimed that its intention was to cut expenditure on agencies that duplicated ministry roles, there is little overlap between the NGO Bureau and the Ministry of Internal Affairs' mandates. While the Ministry has a national mandate over citizen registration, immigration, public order and internal security, the NGO Bureau's mandate specifically focuses on NGO registration, development, and monitoring.

Under this rationalisation, the NGO Bureau's functions and structures have fundamentally remained unchanged. Consequently, many in civil society see the Bureau's reabsorption into the Ministry of Internal Affairs as part of an orchestrated plan to purge NGO activities from the country, as the ministry is led by military officials. This view is reinforced by the debate around the Protection of Sovereignty Bill (2026). In introducing the Bill, state minister Gen David Muhoozi argued that it sought to prevent undue external influence on government, regulate foreign funding, and safeguard national security. However, legal analysis showed that it imposed criminal liability, mandatory registration, and sweeping foreign-funding restrictions on a vast range of organisations and individuals operating in Uganda across the NGO, private sector, media, academic field, diplomatic missions and faith-based entitites. The penalties included imprisonment of up to 20 years and fines of up to UGX 4 billion (ca. EUR 890,000).

As enacted, the Protection of Sovereignty Act, 2026, affects a wide range of civic actors, including foreign-funded NGOs, NGO leaders, international NGOs and intermediary organisations. Financial support above UGX 400 million (approx. USD 100,000) must be declared, implying that organisations conducting lawful activities supported by foreign resources may be treated as foreign agents, and therefore classified as a threat to national security. Although the final Act reduced the penalties proposed in the Bill, individuals may still face up to ten years imprisonment or fines up to UGX 1 billion (approx. USD 265,000) for non-compliance. The implications for civil society are that the Act's broad reach and punitive compliance regime effectively restrict both freedom of association and the abilty of civil society actors to seek and receive support for legitimate work .

For CSOs in Uganda, the passing of the NGO Amendment Act (2024) and the Protection of Sovereignty Act (2026) represent a growing trend of using 'lawfare' to broaden the government's regulatory powers to gatekeep CSO operations. They are an addition to the existing arsenal of permit-renewal delays and the freezing of bank accounts, measures that have been used as pretext to curb the operations of CSOs like the African Institute for Investigative Journalism, whose work is considered critical of the government.

Case Study: Permit Renewals and District MOUs as Operational Gatekeeping
In a communication issued to the government of Uganda on 19 December 2025, the UN Special Rapporteur on the right to freedom of peaceful assembly highlighted the delays in renewal of NGO permits and account freezes as a significant barrier to CSO activities in Uganda. The communique also reports that the requirement of MOUs with districts is being used by local governments to restrict the operations of associations critical of local policies and decisions, even when they have valid operating permits. These procedures are especially weaponised to harass organisations working on issues of sexual orientation and gender identity. While these forms of administrative restriction are less visible, their selective deployment becomes a mechanism through which operational autonomy can be narrowed.

Dimension 2.3: Protection from Interference— *Formal safeguards exist, but discretionary interference increasingly undermines legal protections.*
Uganda's legal framework contains important protections against arbitrary state interference in civil society. Article 29(1) of the Constitution protects freedom of association; article 42 guarantees just and fair treatment in administrative decisions and access to court review; and article 43 further limits restrictions on rights by requiring them to remain demonstrably justifiable in a free and democratic society. In principle, these safeguards mean that CSOs are

protected from administrative overreach and can seek redress in court. In practice, however, the statutory framework gives regulators broad powers to interfere in CSO activity with little room for effective redress.

In Chapter Four Uganda v National Bureau for Non-Governmental Organisations (MC No.292 of 2021), the High Court held that an indefinite suspension of an NGO permit was irregular because it lacked a defined timeframe. It ordered the regulator to accord the organisation a just and fair hearing. While this case upheld important safeguards and established a precedent that statutory discretion must be exercised rationally and procedurally, the recent indefinite suspension of Chapter Four and nine other CSOs shows that there is a state practice to ignore court orders and legal protections, leaving CSOs without effective redress against regulatory overreach. The Ugandan state has no regard for due process.

The manner in which the Protection of Sovereignty Act, 2026, was enacted signaled a state seeking a legal pretext to override constitutional protections against interference in civic activity. Despite unprecedent opposition from broad sections of the Ugandan public, including civil society, opposition MPs, the private sector, financial sector, and the governor of the Bank of Uganda, the government leveraged its majority in parliament to pass the bill amid widespread criticism of the procedural irregularities in its passage. In spite of massive pushback and subsequent amendments that struck out some of the initial draconian clauses, the bill was passed within one month.

The urgency with which the Protection of Sovereignty Act was passed is motivated by President Museveni's mistrust of civil society. In October 2025, the government suspended cooperation with GIZ-Uganda following accusations that its Strengthening Governance and Civil Society Programme (GCSP) was being used as a cover to resource 'regime-change-infrastructure'. As President Museveni's administration becomes increasingly more authoritarian, there is a growing tendency to promote laws that give the state a legal basis to crush all opposition to its will.

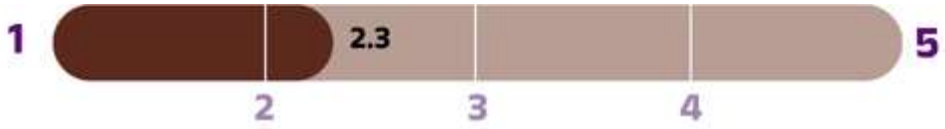
Case Study: Arbitrary Suspension of 10 CSOs before the January 2026 Elections
On 9 January 2026, the NGO Bureau indefinitely suspended the operating permits of 10 CSOs: the African Centre for Media Excellence, Agora Centre for Research, African Centre for Treatment and Rehabilitation of Torture Victims, Alliance for Finance Monitoring, Centre for Constitutional Governance, Human Rights Network for Journalists in Uganda, Uganda National NGO Forum, Network of Public Interest Lawyers, Chapter Four Uganda and the National Coalition of Human Rights Defenders Uganda.

The Bureau claimed that it had received intelligence alleging activities 'prejudicial to the security and laws of Uganda' but declined to provide evidence of the alleged activities. The affected organisations were focused on human rights, legal aid, media freedom, governance, election monitoring and civic accountability rather than routine service delivery. The suspensions illustrate the breadth of regulatory discretion available to the government. Formal regulatory mechanisms can become instruments for constraining CSO autonomy without room for redress. By the time of writing this report, the affected CSOs remained suspended despite parliamentary appeal.

PRINCIPLE SCORE

3. Accessible and Sustainable Resources

Score[4]:



Dimension 3.1: Accessibility— *Funding exists, but access is narrowing*

CSOs in Uganda remain legally able to seek resources from domestic and international sources, even with the passing of the Protection of Sovereignty Act, 2026. Some continue to secure substantial grants; however, access to funding has become markedly more difficult, especially for local, regional, and grassroots organisations. Following the shock of USAID's withdrawal in January 2025, which resulted in a funding gap of more than UGX 600 billion (roughly USD 160 million) that disrupted governance, health, humanitarian and civic edcuation programmes, the October 2025 suspension of GIZ programmes froze UGX 22 billion (EUR 5.5 million), further shrinking the funding available to Ugandan CSOs.

According to local experts, the shrinking pool of available resources is not the only problem. Access to funding is constrained by restrictive guidelines, low trust in local organisations, complex application processes, and minimum budget thresholds that lock out many local actors. At the same time, the shrinking funding pool has also intensified competition between international and local organisations.

During the Philanthropy Symposium 2025, Ugandan civil society, led by Uganda National NGO Forum and CivSource Africa, launched a drive to frame and promote local philanthropy as a response to shrinking external aid. The Symposium found that domestic philanthropy can offer some counterweight to the contraction in access to foreign funding. Domestic resources do exist at a meaningful scale; Ugandans give through faith institutions, cultural networks, and crowdsourcing, while businesses are increasingly embracing philanthropy through corporate social responsibility (CSR) and environmental, social, and governance (ESG) frameworks. These sources, however, are not yet a consistently accessible funding base for the civil society sector. Much local giving remains informal, undocumented, and fragmented.

[4] *Scores are on a five-category scale defined as: fully disabling (1), disabling (2), partially enabling (3), enabling (4), and fully enabling (5).*

Drawing on consultations with 128 NGOs and 87 community-based organisations across Uganda, CAPAID Uganda's local leadership labs found that 43% of local and national actors received only quarterly or activity-based funding, and just 23% accessed multi-year funding; 68% did not receive support for basic organisational costs such as staff wages, utilities, and corporate governance and compliance. While larger NGOs generally have stronger audit systems, grant staff, established donor relationships and networks, and the digital infrastructure needed to respond to complex calls for proposals, smaller CSOs lack the financial management and administrative systems donors require, and are often excluded by donor policies that prioritise eliminating risk rather than sharing it, pointing to a funding architecture that systematically disadvantages local actors and grassroots organisations.

There is evidence that resources continued to enter and circulate within the sector. For example, CARE International's 2025 Report shows that it raised $17.12 million from grants and donations, of which 45% ($6.98 million) was channelled through 62 local partner organisations. This shows that substantial funding can reach local actors, but often through international intermediaries rather than through direct donor relationships. For local CSOs, the route to funding remains through sub-granting and implementation support for activities in a narrowing space dominated by intermediary CSOs that are better positioned to satisfy donor requirements, manage risk, and compete for grants.

Case Study: Localisation Commitments Yet to Translate into Direct Access
Under the Grand Bargain, localisation was supposed to redress the gap in funding access for local CSOs. The Grand Bargain committed donors to provide atleast 25% of humanitarian financing to national and local actors. However, the gap between international commitments and actual distribution remains wide. A UKaid study on localisation of funding for Uganda's refugee response found that less than 1% of available funding is controlled by local CSOs. Of the more than $391 million received for refugee response in 2024 under the Uganda Country Refugee Response Plan (UCRRP), 76.8% was managed by UN agencies, 22% by international NGOs, and only 0.8% by national NGOs, even though local and national CSOs make up the larger portion of the response architecture.

Dimension 3.2: Effectiveness— ***Funding remains restrictive, but flexibility is growing***
Funding effectiveness in Uganda is mixed. Much of the sector still depends on short-term, activity-based grants with limited provisions for institutional costs. While donor reporting requirements can constrain how organisations respond to changing circumstances, experts identified a meaningful shift in flexible and more local-led forms of financing among some foundations and bilateral donors. However, restrictive funding models remain a barrier to effectiveness. Most organisations still work within donor systems that are project-based, heavily bureaucratic, and weak on institutional support.

Local CSOs may secure funding only when they fit their work within donor-defined thematic calls with overhead limits and activity-based funding that leaves little space for institutional strengthening or core mission priorities. For example, 68% of CSOs do not receive funding for organisational management. These conditions make funding usable for delivering prescribed activities but much less effective for building organisations capable of sustaining those activities. This imbalance is particularly limiting for governance and human rights organisations whose needs can change quickly in response to elections, legal restrictions, or security threats.

Experts report that there is growing evidence of flexibility in donor conditions, as major donors respond to the situation of growing regulatory overreach and shrinking space in the civil society sector. Following the controvercial suspension of 10 CSOs in the build-up to the January 2026 election, some funders have adopted alternatives such as using fiscal-agent arrangements when organisations cannot safely receive funds directly, alternative payment arrangements when bank accounts are frozen or inaccessible, and programme budget modifications when the operating environments change adversely.

Denmark's Uganda Bilateral Development Program provides a good example of more locally oriented and collaborative approaches. Its 2023–2028 strategy states that support for

accountability, civic engagement, and human rights will be implemented mainly through civil society organisations and identifies localisation, local ownership, and leadership as guiding principles. Denmark's governance engagements are jointly supported with Ireland, the Netherlands, and Sweden, and grants are provided to individual CSOs and consortia. Experts also identified the National Endowment for Democracy (NED), Ford Foundation's BUILD initiative, and European bilateral partners as comparatively adaptive funders, particularly in politically sensitive governance and human-rights work.

Case Study: Sida's Core Support Model
The Swedish International Development Cooperation Agency's (Sida) 2025-2029 Civil Society Strategy provides a good illustration of how bilateral partners are evolving towards more flexible funding models. Under this model, selected CSOs may receive core support covering their overall strategic plan and annual work plan and budget rather than just for isolated activities. In June 2025, Sida also confirmed that agreements under this Strategy could run for three years, with the possibility of extension, balancing predictability with future calls for new partners. This approach gives organisations more space to adapt programmes as circumstances change rather than remain tied to rigid activity plans.

Dimension 3.3: Sustainability— ***Funding remains fragile and unpredictable***
Civil society in Uganda still depends on a relatively narrow and unpredictable funding base, leaving many organisations exposed to donor withdrawals, gaps between grants, and abrupt changes in external priorities. The sharpest, recent change has been the contraction of international development financing and growing state oversight of organisations managing international funding in Uganda.

By late 2025, reporting on Uganda's civic sector showed that the closure of USAID programmes cut support for governance, democracy, and human rights by more than $8.5 million; several programmes were closed mid-stream and have not received funding since. Analysis by the Civil Society Budget Advocacy Group (CSBAG) estimates a loss of 15,000 jobs across NGOs, research institutions, and project agencies following the USAID exit, which removed over $400 million in annual funding that had supported programmes in governance, healthcare, education and community engagement.

Experts also observed that the predominance of short funding cycles threaten organisational continuity. Short-term grants create gaps between funding cycles, and when new grants are delayed or fail to materialise, organisations may reduce staff, suspend programmes, or operate through volunteer labour. This limits strategic planning. Project-based grants are generally tied to specified outputs and timeframes, making it difficult for organisations to invest in long-term institutional development or pursue programme goals beyond the life cycle of a grant.

Opportunities for local fundraising exist but are insufficient to replace external donor financing. The 2025 World Giving Report found that 79% of Ugandans give money to charitable concerns – above the global average of 64%; however, mistrust in NGOs and the absence of domestic policy incentivising philanthropy were identified as significant barriers to scaling up local philanthropy as a viable source of funding for the civil society sector. Many CSOs have begun experimenting with income-generating and locally financed models like social enterprise, cooperative initiatives, and local fundraising drives.

In 2025, for example, Uganda National NGO Forum continued a Match Funding Grant where eligible NGOs and CBOs would receive a 50% match against funds they raise domestically. Other initiatives include CivSource Africa's Giving Tuesday Uganda campaign, UNNGOF's Change the Game Academy, and Masaka School for the Deaf's self-reliance model, which typify the growing shift towards hinging the sector's future sustainability on local fundraising.

Experts also noted that communities provide substantial volunteer labour, in-kind support, and small-scale giving, but household income constraints and limited organisational capacity to sustain local fundraising efforts mean that these sources generally supplement institutional

funding rather than provide a viable replacement. For many CSOs, self-reliance is still an early-stage growth strategy.

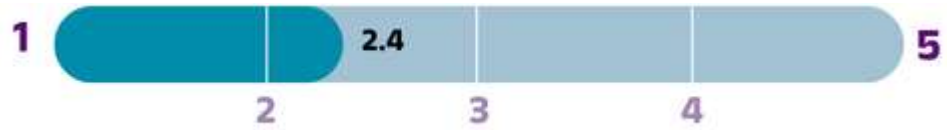
Case Study: Building community foundations as local financing institutions
In 2025, CivSource Africa/CivLegacy Foundation expanded a Community Foundations Incubation Program designed to build locally rooted philanthropic institutions capable of mobilising resources from within their own communities. By December 2025, the programme had supported 18 emerging and established community foundations. Participants receive mentorship, masterclasses and practical support in leadership, governance, strategy and fundraising, with the aim of building institutions that can mobilise both financial and non-financial resources locally.

The model differs from conventional donor-funded projects. Rather than requiring individual CSOs to repeatedly compete for external grants, community foundations are intended to pool local 'time, talent and treasure' and direct those resources towards locally determined priorities in areas such as education, health, women's rights, youth livelihoods, climate justice and civic participation. Its scale remains modest relative to Uganda's overall civil-society financing needs, and the programme itself acknowledges continuing weaknesses in fundraising capacity, leadership, and governance. While pathways to greater self-reliance are emerging, they remain too limited in scale and institutional strength to provide broad sector-wide sustainability.

PRINCIPLE SCORE

4. Open and Responsive State

Score[5]:



Dimension 4.1: Transparency— *Access is legally required but uneven in practice*

Uganda has a fairly clear legal framework for access to public information. A fair amount of government information is now published online, but this is mostly limited to fiscal, administrative, and legislative information. However, information that is deemed politically sensitive is difficult to access, and requests for information are frequently delayed, ignored, or restricted. The right to access public information is granted by article 41 of the Constitution and governed by the Access to Information Act (2005). The Act requires state organs to make available records held by public bodies, subject to national security and privacy limitations. Public bodies are required to proactively maintain and periodically publish manuals describing their functions, records, services, participation mechanisms, and categories of information available without a formal request. The Act, however, does not establish an equivalent right to information held by private entities that perform a public function.

Proactive disclosure is strongest in public finance, audit, and parliamentary information. The Ministry of Finance, Planning, and Economic Development, for example, publishes the National Budget Framework Paper on its budget information portal annually. This portal also contains draft and approved estimates, ministerial policy statements, expenditure information, and local-government budgets.For FY2025/2026, it also published Luganda and child-friendly editions of the Citizen's Guide to the budget, taking one step closer to making public information accessible to wider sections of the population. Similarly, the Office of the Auditor General publishes consolidated annual audit report and individual audit reports for central and local government institutions, while Parliament publishes bills, legislation, committee reports and hansards annually.

The procedure for formal requests is reasonably clear. Under section 15 of the Access to Information Act, an information officer must decide a request within 21 days. Fees are limited to the actual costs of retrieving and reproducing information. A refusal must identify adequate

[5] *Scores are on a five-category scale defined as: fully disabling (1), disabling (2), partially enabling (3), enabling (4), and fully enabling (5).*

reasons and the relevant statutory provision. Applicants may challenge a refusal before a chief magistrate and may ultimately appeal to the High Court. The law also requires reasonable accommodation for persons with disabilities without additional access charges.

Despite these developments, implementation of the Act is considerably weak. Studies show that around 80% of information requests are denied, especially in controversial sectors such as extractive industries. Uganda remains part of the Extractive Industries Transparency Initiative (EITI) and has established a multi-stakeholder mechanism intended to improve disclosure of revenues, ownership, and sector governance.

The EITI reported continued institutional progress in 2025, including Uganda's appointment of a new multi-stakeholder group. However, EITI continues to emphasise that extractive-sector transparency depends on fuller disclosure of contracts, ownership information, revenues, and environmental and social data. Requests for information may be delayed, ignored, or frustrated by statutory exemptions and institutional reluctance to disclose.

Access can also be weakened by '*information dumping*'," when large volumes of data are released in ways that make meaningful analysis difficult for CSOs. As a result, disclosure exists, but it is not consistently timely, complete, or usable.

Case Study: Access to 2026 election records
The handling of information surrounding the 15 January 2026 presidential election illustrates the gap between formal access rights and access to politically sensitive public records. On 15 February 2026, Rogers Kanti petitioned the Electoral Commission for certified copies of the Presidential Declaration of Results forms from all polling stations, explicitly invoking his constitutional right to access to information. The Presidential Elections Act, 2005 requires copies to be completed at polling stations, displayed publicly, distributed to candidates' agents and transmitted through the Electoral Commission's results system.

By 3 May 2026, more than 100 days after polling, the forms had still not been published centrally online. The Electoral Commission's website continued to display historical election results without equivalent 2026 documentation. Whereas an argument can be made for information on extractive or defence transactions being politically sensitive and justifiably withheld, a presidential election result is a public record. Election results remaining undisclosed after multiple applications for disclosure by both private citizens and political actors illustrates a state where access to information is uneven and selective.

Dimension 4.2: Participation— *Opportunities exist, but participation remains selective.*
While there are several formal channels through which civil society can participate in public decision-making, the quality of that participation varies sharply by institution, subject matter, and level of political sensitivity. The enabling environment is characterised more by inconsistent access than systematic exclusion. CSOs participate in parliamentary committee hearings, national and local planning processes, budget consultations, ministry working groups and district structures. However, participation remains dependent on the institution and political context. Sensitive legislative processes can be accelerated in ways that sharply reduce civil society's practical ability to engage.

Experts identified the Ministry of Finance, Planning and Economic Development, and the National Planning Authority as institutions that are particularly open and receptive to civil society contributions and participation. During preparation of the Fourth National Development Plan (NDP IV), the Uganda National NGO Forum coordinated a CSO Fundamentals Paper and thematic submissions based on wider civil society consultations. CSOs held several engagements with the National Planning Authority during formulation of the plan. NGO Forum Budget processes similarly provide recurring opportunities for organised civil society to engage government. These examples show that state institutions can accommodate sustained civil society input where consultation is built into established planning processes.

This standard, however, is not applied consistently. In circumstances where the state has a vested interest in pushing for a specific outcome, experts note that invitations arrive too late

for organisations to research issues, consult constituencies, and prepare substantive positions. The Uganda Peoples' Defence Forces (Amendment) Bill, 2025 illustrates this pattern well. Introduced on 13 May 2025, the public was given until the following day to submit views. The joint-committee ultimately received non-governmental input only from Advocate Jude Byabakama who opposed the trial of civilians in military courts and the Kampala Reduction in Force UPDF Veterans' submission on pensions. The joint-committee's own dissent report argued that the compressed timetable had effectively excluded other stakeholders. Parliament passed the bill on 20 May, seven days later.

While the Consistution of Uganda is silent on the right of citizens to participate in the lawmaking process, legal scholar Jamil Ddamulira Mujuzi (Journal of African Law) argues that it can be inferred from the National Objectives and Directive Principles of State Policy and article 38 (1) of the Constitution that Ugandans have a right to participate in lawmaking and that such participation can be organised through civil society. The more politically consequential the bill, the more time should be allocated to enable citizens to make as many submissions as possible. An expedited process disables meaningful civic participation.

In a similar fashion, the Political Parties and Organisations (Amendment) Bill, 2025 introduced on 14 May 2025 was passed on 20 May 2025, within six days. The Minority Report of Sectoral Committee of Legal and Parliamentary Affairs (p. 5-7) found the expedited timeline fell short of meeting the constitutional requirements for public participation in the enactment of legislation. These developments illustrate a growing pattern of civil society exclusion from legislative processes in which the state has a vested interest.

Case Study: Delayed accreditation for electoral participation
Civil society's experience with accreditation for the 2025–2026 electoral process illustrates how formally available participation can lose effectiveness through delay. The Electoral Commission is required under section 16 of the Electoral Commission Act to accredit civil-society organisations and other institutions to observe elections. Its voter education mandate expressly provides for cooperation with accredited NGOs.

In preparation for the 2026 elections, the Commission publicly invited organisations to seek accreditation for observation and related electoral activities. However, civil-society organisations complained that applications for voter education and long-term observation had remained unresolved for months. Sarah Bireete of the Centre for Constitutional Governance stated that some organisations had applied eight months earlier but had received no decision, despite electoral activities already being underway. While a formal accreditation mechanism existed, delays reduced organisations' ability to undertake long-term observation and timely voter education **–** activities that depend on participation throughout the electoral cycle rather than immediately before polling.

Dimension 4.3: Accountability— *Consultation occurs, but feedback remains weak*.
Mechanisms through which civil society can engage government and monitor public decisions exist, but there is no consistent practice of showing how CSO recommendations have influenced final policy. Organisations may submit memoranda, participate in consultations, and make recommendations without subsequently receiving a clear explanation of what was accepted, rejected, or modified. Experts characterised this as a recurring pattern of 'participation without accountability'. There are important exceptions.

Public finance processes have comparatively developed mechanisms for engagement and follow-up. During the National Budget Month for FY2025/26, the Ministry of Finance, Planning, and Economic Development explicitly committed to accounting to citizens for previous budget commitments and obtaining feedback to inform future budgets and policies. The programme included pre- and post-budget engagements involving CSOs such as the Civil Society Budget Advocacy Group (CSBAG), Southern and Eastern Africa Trade Information and Negotiations Institute (SEATINI), and Advocates Coalition for Development and Environment (ACODE), as well as regional taxpayer dialogues.

The Local Government Budget Consultative Workshops for FY2026/27, held between 15 September and 3 October 2025, were designed not only to collect new submissions but to provide feedback on recommendations made during the previous FY2025/26 consultations. Likewise, the National Budget Information Portal allows citizens to review central and local-government expenditure data and submit feedback online, by email, or through a toll-free hotline. These mechanisms show that structured government response is possible where accountability has been institutionalised. However, this practice is not consistent across the government.

Experts are concerned that CSOs frequently invest substantial time in consultations and written submissions without receiving feedback or explanations of how their input affected the final outcome. The problem is significant enough to be acknowledged in the government's own reform agenda. The Public Financial Management Reform Strategy, July 2025 notes that engaging CSOs such as CSBAG has provided a useful entry point for accountability but concludes that this approach 'may not be sufficient on its own to drive meaningful change'. It calls for broader engagement with media, local leaders, and community groups to strengthen downward accountability and ensure government action is responsive to citizens.

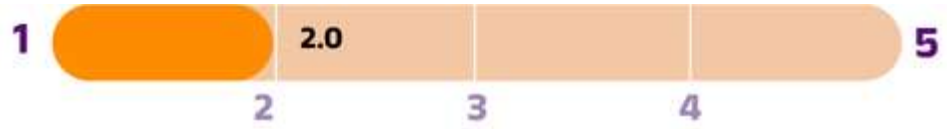
During the development of NDP IV, CSOs coordinated through the Uganda National NGO Forum contributed through a CSO Fundamentals Paper and thematic submissions, and engaged repeatedly with the National Planning Authority. They never received feedback on which CSO recommendations had actually been incorporated, forcing UNNGOF to commission an independent study specifically to establish the fate of the civil society submissions. Without systematic explanations showing how civil society recommendations have been treated, the government can demonstrate that consultation occurred without being equally accountable for its outcome.

Case Study: NGO regulatory review and the missing feedback loop
In 2025, the National Bureau for NGOs conducted a Regulatory Impact Assessment (RIA) and review of the NGO Policy 2010 and NGO Act, 2016, intended to modernise the regulatory framework and improve relations between government and civil society. The process included consultations with NGO leaders and later formed a major part of discussion at the National CSO Convention in September–October 2025, where government and civil society representatives examined constitutional alignment, regulatory burdens, and the need for a more enabling framework. In June 2025, the Centre for Constitutional Governance produced an assessment and policy brief examining the NGO Policy and Act, identifying constitutional and operational concerns and making recommendations for reform. The government neither provided feedback on the reforms proposed by CSOs nor documented their contributions in the final RIA.

PRINCIPLE SCORE

5. Supportive Public Culture and Discourses on Civil Society

Score[6]:



Dimension 5.1: Public Discourse and Constructive Dialogue— *Recognition coexists with hostile political framing.*

Public discourse on civil society in Uganda remains sharply divided according to the type of work organisations undertake. CSOs involved in service delivery, development, research and economic transformation continue to be publicly recognised as legitimate partners of government. In contrast, organisations working on governance, elections, accountability and human rights are more frequently associated with foreign influence, political opposition, or threats to national interests. Experts described this as a two-track relationship in which constructive dialogue remains possible, but legitimacy is not extended equally across the sector.

The positive side of this relationship is visible in official government discourse. The Ministry of Finance describes CSOs as "key partners" in Uganda's economic transformation and credits them with contributing to employment, human-capital development, accountability, climate resilience and evidence-based policy reform. It also recognises their role in monitoring public investment and amplifying citizens' voices. During budget consultations in August 2025, Uganda's Permanent Secretary and Secretary to the Treasury (PSST), Dr Ramathan Ggoobi, described civil society's research, advocacy, accountability and community engagement as important to shaping public policy.

These examples show that civil society is neither uniformly delegitimised nor excluded from public policy discourse. However, the picture changes considerably when organisations engage in politically sensitive advocacy. This became especially visible during debate on the Protection of Sovereignty Bill, 2026. The Bill explicitly sought to regulate foreign-backed actors involved in attempts to influence public policy, elections, and government decision-making, with the government framing it as a measure necessary to protect Uganda's independence in national decision-making and safeguard national policy space.

[6] *Scores are on a five-category scale defined as: fully disabling (1), disabling (2), partially enabling (3), enabling (4), and fully enabling (5).*

Civil society and human rights organisations challenged this framing. Human Rights Watch warned that the law risked stigmatising civil-society organisations and other civic actors through broad 'foreign agent' provisions, while Ugandan CSOs argued that it could weaken constitutional freedoms and participatory governance. The controversy was substantial enough that the government subsequently narrowed several provisions, including the definition of foreigner, ministerial discretion, and the scope of persons who could be classified as foreign agents. The framing of the Bill illustrates the contradiction. The same civic sector can be publicly described as indispensable to development and accountability in one context, and then framed as a threat to national sovereignty and security in another. Experts also observed that this distinction is reproduced in media and public debate. CSOs continue to access platforms for advocacy but politically charged narratives undermine their legitimacy.

Case Study: Chapter Four challenges the 'security threat' framing of NGOs
In December 2025, Chapter Four Uganda used its annual human rights assessment to challenge the way civil society was being discussed in public discourse. Chapter Four's Nicholas Opiyo argued that NGOs were increasingly being framed as security threats or agents of foreign interests rather than as legitimate development and accountability actors. He emphasised the need to shift how civil society is perceived in Uganda, arguing that NGOs are too often framed as security threats, a framing he rejected because 'Civil society offers jobs, mobilizes resources globally, creates employment, drives innovation and new policies, and holds governments accountable, which strengthens democracy', he said.

Addressing concerns about foreign funding, Opiyo dismissed the notion that receiving international financial support makes NGOs agents of foreign influence. If that were the case, he argued, the government of Uganda would be the biggest foreign agent in the country because it receives foreign funding. Global financing is a reality and civil society should not be penalised for accessing it.

Dimension 5.2: Public Perception and Civic Engagement— *Demand for democracy persists, but citizen engagement is weakening.*
Ugandans continue to value democratic participation and remain active in elections, community initiatives, and civil society; however, sustained civic engagement is weakened by low confidence that participation will influence public institutions, as well as limited civic education and declining civic participation among younger citizens. Experts observed that while the underlying demand for democracy remains strong, the practical depth of civic engagement is weakening. A 2025 Afrobarometer study found that 83% of Ugandans said elections were the best way to choose leaders; 77% supported multiparty competition; and 73% still said they preferred democracy to any other form of government, indicating that low participation in some forms of civic life should not be interpreted as rejection of democracy. The problem lies more in citizens' confidence that engagement will lead to a response.

Youth participation is particularly weak. A report by Centre for Basic Research, which mapped the civic behaviour of young Ugandans, detailed widespread voter apathy and a sense of alienation among youth. The report found that young voters are increasingly avoiding the ballot box due to deep disillusionment with the electoral process. Many perceive the system as perpetually rigged in favour of the same aging political leadership. Experts linked this weaker engagement partly to deficiencies in civic education. Civil society has historically supplemented state voter education, particularly in rural and hard-to-reach areas, but the 2025 contraction in donor funding weakened that role. A report by Devex found that the withdrawal of USAID support hollowed out networks that had previously reached rural and first-time voters, significantly reducing the range and reach of organisations able to provide sustained civic learning beyond basic polling procedures.

Generally, Ugandans overwhelmingly believe that CSOs play a highly positive and indispensable role in their country. They see CSOs as public watchdogs, human rights defenders, and vital buffers between the public and state power. However, arbitrary suspensions of prominent organisations and new restrictions, such as the Protection of Sovereignty Act, are crippling CSOs' ability to support structures that ordinary citizens value. While high-level national political action is low due to intimidation (e.g., only 4% post political

opinions on social media and 3% join public protests), citizens remain highly active at the grassroots level.

Data from Twaweza confirms that citizen involvement is strongest in local, non-political community initiatives—such as village meetings, agricultural cooperatives, and local development groups. However, citizens feel these efforts rarely scale up to influence national policy due to a perceived lack of institutional listening by central authorities. Citizens continue to vote, value democratic choice and participate in community life, but participation is often shallow, episodic, and seldom influences decision-making.

Case Study: Anti-EACOP protesters and the cost of civic participation
The treatment of the anti-EACOP protesters arrested on 1 Augst 2025 illustrates how the personal cost of civic participation can discourage citizens from engaging in public advocacy. Most of these were university students using peaceful demonstrations to press banks, embassies, and public institutions to withdraw support from the East African Crude Oil Pipeline. Although their protest was entirely peaceful, they were denied bail and spent eight months and 17 days in a maximum security prison for the duration their trial. They were released on 21 April 2026, days after a magistrates court had sentenced them to 11 months imprisonment and commuted their sentence for time served. While in jail, two protestors lost their parents and were denied temporary bail to bury them. The price they paid for their efforts was a conviction record, the psychological oppression of being locked up with hardened criminals in a maximum security prison, and stigmatisation in their communities for endangering their families— a clear signal to others of what could befall them if they followed suit.

Dimension 5.3: Civic Equality and Inclusion— *Formal presentation, but civic influence is uneven.*
Uganda has an extensive constitutional and legal framework for affirmative action, but formal representation has not translated into equal civic influence. Article 32 of the Constitution requires affirmative action for groups marginalised on the basis of gender, age, disability or historical disadvantage, while article 78 provides reserved parliamentary representation for women, youth, and persons with disabilities. The 12th Parliament, with a total of 553 members, therefore, includes 136 district women representatives, five youth representatives, and five representatives of persons with disabilities, alongside the 353 open constituency seats.

These mechanisms ensure presence in national institutions, but experts observe that representation through reserved categories is not equivalent to equal access to mainstream political competition or decision-making power. For example, women are guaranteed a representative for every district and city, giving women a substantial parliamentary presence intended to build their capacity to engage in mainstream. Yet relatively few women win the open constituency seats contested on the same terms as male candidates—only 16/353 direct seats (4.5%) in the 12th Parliament, compared to 4.2% in the 6th Parliament (1996-2001). Experts, therefore, question whether affirmative action has sufficiently changed the underlying conditions of political competition.

The low participation of women and youth in elective politics has been attributed to the increasing monetisation of electoral politics. Campaign financing, nomination costs, and constituency mobilisation require resources that are often less accessible for women and younger candidates . An analysis of campaign financing for members of parliament in the 2021 election cycle reported a range of $13,889 for the lowest spender to $1 million for the highest spenders (Alliance for Finance Monitoring, ACFIM). With a median monthly income ranging from $135 to $270 for educated women and youth, many are locked out of elective politics.

Indigenous and historically marginalised communities that do not benefit from comparable constitutional recognition face a deeper form of exclusion. In its annual report, The Indigenous World 2026, the International Work Group for Indigenous Affairs (IWGIA) identifies the Benet, Batwa, Ik, Karamojong and Basongora among Uganda's indigenous communities but notes that the state does not specifically recognise them as Indigenous Peoples. The report documents continuing land dispossession and threats to traditional livelihoods, particularly

among the Batwa and Benet. For such communities, exclusion extends beyond representation to recognition of identity, land interests, and the ability to influence decisions affecting their livelihoods.

For LGBTQI+ people and organisations, the Anti-Homosexuality Act, 2023 has significantly narrowed the space for civic participation. The law has contributed to arrests, harassment, public outing, evictions and attacks, while organisations providing legal, health, and psychosocial support have faced closure and interference. As a result, many LGBTQI+ people and advocates face heightened risks when organising, associating openly, or participating in public advocacy. Therefore, whereas affirmative action provisions exist, these mechanisms have not removed the economic, physical, cultural and structural barriers governing who can compete for public office, and participate and exercise influence outside reserved spaces. Groups without protected representation remain even more marginalised.

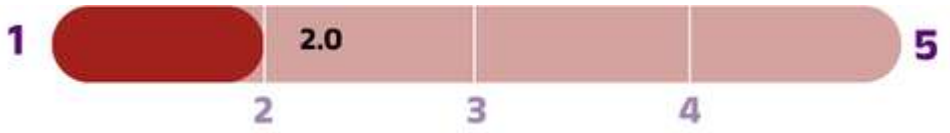
Case Study: Persons with Disabilities — representation without equal access

Uganda reserves five parliamentary seats for persons with disabilities, and the Electoral Commission successfully conducted elections for these representatives in February 2026. However, reports on that election show wide gaps in removing barriers to participation for persons with disabilities (PWD). At a December 2025 stakeholder engagement convened by the National Council for Persons with Disabilities, participants identified inaccessible polling stations, high nomination fees, limited voter education and weak awareness within political parties as continuing obstacles. Disability advocates separately called for Braille voting materials, ramps, sign-language interpretation and more accessible polling information. While Uganda has created institutional mechanisms to ensure representation of PWD, their presence in Parliament has not been converted into full equality.

PRINCIPLE SCORE

6. Access to a Secure Digital Environment

Score[7]:



Dimension 6.1: Digital Rights and Freedoms— *Online access remains but under significant restriction*

Uganda's digital civic space remains active, but citizens and CSOs cannot rely on uninterrupted access to digital platforms or exercise online expression without significant legal and political risk. Constitutional protections for freedom of expression provide an important foundation, and digital platforms remain widely used for civic debate, advocacy, and criticism of public authorities. However, experts warn that internet shutdowns, criminal prosecutions arising from online speech, and broad statutory controls significantly weaken these protections in practice.

Article 29 of Uganda's Constitution protects freedom of speech and expression, including freedom of the press and other media, and these guarantees extend to digital communication. Yet the Computer Misuse Act Cap 96, together with its later amendments, created offences governing online communication that have been used against people posting criticism of senior public officials. In August 2025, Makerere University student Elson Tumwine was sentenced to two months' imprisonment after pleading guilty to an offence arising from a TikTok video criticising President Yoweri Museveni and Speaker Anita Among. In December 2025, student Edison Ssemugenyi received a six-month sentence after pleading guilty to malicious information charges relating to TikTok posts. In February 2026, Henry Bbosa was charged with hate speech under the Computer Misuse Act and incitement to violence over TikTok videos.

In the landmark case of Alternative Digitalk Limited and Others v The Attorney General (Consolidated Constitutional Petitions No. 34, 37 & 42 of 2022) [2026] UGCC 3 (17 March 2026), the Constitutional Court nullified sections 11, 23, and 26-29 of the Computer Misuse Act (2023), and Section 162 of the Penal Code Act, demonstrating that unconstitutional restrictions can be successfully challenged through the courts. While this was an important

[7] *Scores are on a five-category scale defined as: fully disabling (1), disabling (2), partially enabling (3), enabling (4), and fully enabling (5).*

development for digital freedom, it did not correct previous injustices. The Attorney General directed law-enforcement agencies to cease arrests and proceedings under the impugned sections, but noted the individuals convicted under the nullified provisions would continue to serve their sentences.

The most significant incident of restriction was an internet shutdown in the January general elections. Despite an earlier commitment not to shut down the internet, the Uganda Communications Commission (UCC) directed all mobile network operators and internet service providers to suspend public internet accesson on 13 January 2026, two days before the general election, together with new SIM-card registration and outbound data roaming. The shutdown, it claimed, was a proportionate measure to curb misinformation, electoral interference, and incitement during a sensitive period. While UCC began restoring general connectivity on 18 January, full restoration of internet and online services did not occur until 26 January. These shutdowns have been a continuing pattern since 2016.

Experts have also raised concern over reported experiences of bot-driven swarming and coordinated reporting intended to undermine critical users or trigger platform sanctions like account suspension. While there is no concrete evidence that such campaigns are state-directed, it nevertheless demonstrates that online civic expression can be constrained through organised manipulation even when content is not formally removed. Digital civic space thus remains usable. Citizens criticise the government online, CSOs organise digitally, courts can protect constitutional rights and the internet normally operates without blanket restriction. However, the continuing uncertainty over permissible digital speech means that these freedoms cannot be exercised consistently or securely.

Case Study: Manipulation of online political discourse
During Uganda's 2025–26 election period, digital restrictions were not limited to arrests, prosecutions, or internet shutdowns. A study by House of Seshat, based on more than 1.1 million social-media posts collected between July 2025 and January 2026, documented a less visible form of interference: coordinated amplification and manipulation of online political discourse. Researchers monitored X, TikTok, and Facebook, and mapped influential accounts and used automated bot-detection methods to identify likely non-organic activity.

The study found that a relatively small number of highly active accounts generated a disproportionate share of visible political conversation. It also identified coordinated amplification networks, including accounts linked to organised influence operations, and concluded that political actors and other organised groups had become increasingly capable of manipulating platform algorithms to promote or suppress particular narratives. Researchers warned that bots, influencers, and AI-generated content were becoming an important part of Uganda's political information environment. These techniques differ from formal censorship because users may remain technically free to post. Their effect instead operates through visibility: coordinated accounts can flood conversations, amplify attacks, discredit particular speakers or overwhelm competing messages.

Dimension 6.2: Digital Security and Privacy— *Legal safeguards exist but surveillance risks persist.*
The legal framework for privacy and data protection is fairly robust and substantive, but civic actors cannot consistently rely on it to protect their communications, devices and personal information. The Data Protection and Privacy Act, 2019 (Cap 97) regulates the collection, processing, storage and disclosure of personal information by public and private bodies, establishes rights for data subjects and requires a lawful basis for processing personal information. Uganda also has an operational Personal Data Protection Office (PDPO) with powers to investigate complaints and enforce the Act. In July 2025, the PDPO secured its first criminal conviction under the Act against the operator of the Quickloan application for processing personal data without consent and operating without registration, proving that these mechanisms function.

The central tension, however, is between the protections created by the Data Protection and Privacy Act and a parallel legal and technological capacity for communications interception

and surveillance. Experts raised particular concern about journalists, human-rights defenders, and CSOs engaged in governance and accountability work who may face monitoring, account compromise, online harassment or other digital attacks. The Regulation of Interception of Communications Act, 2010 (Chapter 101) gives security institutions substantial lawful surveillance capacity. It establishes a Central Monitoring Centre and empowers the chief of Defence Forces, the director generals of the External and Internal Security Organisations, and the Inspector General of Police to seek judicial warrants for interception. The Act also requires telecommunications providers to maintain systems capable of real-time interception and transmit intercepted communications and call-related information to the Central Monitoring Centre.

Whereas judicial warrants provide an important procedural safeguard, the scale of technical capacity available to the state, together with limited public visibility into its use, creates uncertainty among civic actors about whether their communications remain private. In a regional study on surveillance and spyware published in June 2025, Unwanted Witness identified Uganda among countries where security laws create an enabling environment for surveillance with limited oversight, posing serious risks to civil-society actors, journalists, and human-rights defenders. Call interception, device-extraction technologies, location tracking, spyware and social-media monitoring are common methods used.

The study's analysis of Uganda's legal framework found that its surveillance-related legislation contains significant accountability gaps. Oversight is largely internal to security institutions or exercised through government-appointed structures, limiting independent scrutiny. Broad legal concepts such as national security, public interest, and terrorism leave substantial room for discretionary interpretation. Individuals subjected to surveillance are generally not notified, and there is no strong requirement for public reporting on the use of interception powers. Judicial protection is also limited: warrant procedures are opaque and courts provide little visible oversight of how surveillance powers are exercised.

Therefore, while meaningful protections exist, they coexist with extensive interception powers, reported surveillance of civic actors, and limited evidence that people subjected to unlawful surveillance can consistently identify the responsible actor or obtain effective redress. For CSOs and human-rights defenders, digital security consequently remains uncertain rather than reliably protected.

Case Study: How Cyber Attacks are Earasing Spaces for Civil Society Activity
Civil society actors in Uganda are facing a sharp increase in cyber attacks such as sophisticated phishing and credential theft, targeted surveillance and spyware, and technology-facilitated gender-based violence. The accumulation of these digital threats directly shrinks the operating space for civil society through several debilitating factors: online platforms like X, Facebook, and WhatsApp, which once facilitated civic participation and visibility, have shifted into contested spaces where activists face severe personal security threats; network disruptions and targeted blocks restrict the capacity of CSOs to communicate with local communities and safely document human rights abuses; persistent digital harassment and surveillance fears trigger mental wellness crises among activists, forcing self-censorship; spyware compromises confidential sources, exposing whistlblowers to retaliation.

Dimension 6.3: Digital Accessibility— *Meaningful access remains unequal*
Uganda has expanded mobile and broadband infrastructure considerably, but connectivity is still not equivalent to meaningful digital access. The Uganda Communications Commission (UCC) reported 47.1 million active mobile subscriptions and 18.5 million internet subscriptions, alongside 36.3 million active mobile-money accounts. Mobile cellular voice coverage now extends to 89% of the country, with population voice coverage at 72% and broadband geographic coverage at 85%.
UCC has also expanded public-access infrastructure, including more than 70 Information & Communications Technology (ICT) centres in rural and underserved communities and hundreds of ICT laboratories in schools. These gains mean that digital participation is possible for a growing share of the population. However, affordability, device ownership, digital skills, electricity, geography and accessibility continue to determine who can actually use digital

services consistently and effectively. Experts therefore assessed the environment as disabling rather than wholly inaccessible.

Government data recognise the difference between network availability and use. UCC describes Uganda as still facing a pronounced access–usage gap, noting that connectivity does not automatically translate into meaningful participation because of affordability constraints, limited digital skills, and inadequate relevant content. Gender remains an important dimension of this divide. The GSMA Mobile Gender Gap Report 2025 found that in Uganda, 90% of men owned a mobile phone, compared to 85% of women, but the difference widened when looking at smartphones and actual internet use. Smartphone ownership stood at 27% for men and 21% for women, while mobile-internet adoption was 37% among men compared with 24% among women, a gender gap of 35%. Even among smartphone owners, internet use was not completely equal: 93% of male smartphone owners used mobile internet compared with 86% of women. These figures show that physical possession of a device does not eliminate economic, skill-related or social barriers to participation.

Persons with disabilities face an even more pronounced accessibility challenge. A 2025 study by the Ministry of ICT and National Guidance and the International Telecommunication Union highlights significant disparities in the availability, accessibility, and operational status of ICT centres, with a clear gap in support for persons with disabilities in non-dedicated centres. Persons with disabilities in schools generally have better access to ICT compared to those outside the school system. In stark contrast, persons with disabilities who are out of school face extremely limited access to ICT, as there are very few centres specifically designed to meet their accessibility requirements. The postal telecentres, for example, lack any inclusion strategies or approaches to ensure that persons with disabilities are accommodated. This creates a significant barrier to ICT access and further marginalises persons with disabilities outside the education system. Even though investing in more ICT infrastructure would be beneficial, their main challenges are limited internet connectivity and the lack of accessible digital content to support their educational needs.

Therefore, while Uganda has made significant progress in infrastructure and connectivity, meaningful participation remains uneven. Large differences in affordability, smartphone ownership, gender, disability access, digital literacy and geographic connectivity continue to shape who can make effective use of digital civic space.

Case Study: Uganda's digital skills gap

Uganda's digital-access challenge is increasingly a skills problem as much as an infrastructure problem. The Ministry of ICT and National Guidance's Strategic Plan FY2025/26–2029/30 notes that only an estimated 20% of the population was digitally skilled at the available baseline (2021), while Uganda scored just 33% on the skills domain of its digital-economy assessment. The Ministry itself identifies accelerated digital capacities as a priority because low ICT utilisation continues to limit the benefits of expanding connectivity.

This matters directly for CSOs. Organisations increasingly depend on digital tools for communication, fundraising, reporting, research and public engagement, but a shallow skills base limits both the pool of workers able to perform intermediate digital tasks and the ability of target communities to access and interpret online content. Government programmes had trained more than 10,000 Ugandans in digital skills by October 2025, showing active investment but also the scale of the remaining need.

The gap becomes more consequential as organisations move beyond basic internet use toward emerging technologies. Uganda scored 35.8/100 in the 2025 Government AI Readiness Index, below Kenya, Rwanda, and Ghana. While this index measures government readiness rather than CSO capacity directly, it reflects a wider technological and human capital environment in which organisations and their audiences may struggle to adopt more advanced digital tools.

C) Recommendations

To the Government of Uganda

a) **Ministry of Internal Affairs and National Bureau for NGOs**

i) Simplify and harmonise the regulatory framework for civil society by reducing duplication between the NGO Bureau, URSB, local governments, URA, the Financial Intelligence Authority and the Personal Data Protection Office. The Bureau already has the statutory mandate to register, regulate, and coordinate NGO operations, including engagement with district monitoring structures and other government agencies. Establish clearer timelines and procedures for registration and permit renewal. District-level requirements, particularly recommendations and MOUs, should be standardised so that lawful operation does not depend on inconsistent local administrative practice.

ii) Strengthen procedural safeguards against arbitrary interference with CSOs. Suspension, investigation, and other regulatory action should be based on clearly stated grounds, accompanied by notice and an opportunity to respond, and subject to timely independent review. Broad security-related powers should be applied consistently with constitutional protections for association and due process.

b) **Ministry of Finance, Planning and Economic Development, URA, and Ministry of Internal Affairs**

i) Protect the diversity and sustainability of civil-society financing. Government regulation of foreign-funded activity should avoid unnecessarily constraints to legitimate development, humanitarian, research and advocacy work.

ii) Develop a clearer enabling tax and policy framework for domestic philanthropy, endowments, social enterprises and other locally generated resources.

c) **Ministry of ICT and National Guidance, Parliament, and all public bodies subject to the Access to Information Act, 2005**

i) Strengthen implementation of the Access to Information framework. Public bodies should routinely publish draft legislation, policies, budgets, audit findings and other decision-making information in timely and usable formats.

ii) Comply with statutory response periods, provide reasons for refusals and strengthen mechanisms through which applicants can obtain effective review. Particular attention should be given to proactive publication of information in the extractive sector and other public interest areas.

d) **Parliament, ministries and local governments**

i) Make public consultation meaningful by adopting minimum standards, including: reasonable notice, sufficient time for organisations to consult constituencies and prepare submissions, and accessible opportunities for regional and grassroots organisations to participate, including accessible information, interpretation,

reasonable accommodation, and reduced economic and geographic barriers to participation.

ii) Ministries, Parliament, and local governments should subsequently publish clear feedback showing which recommendations were accepted, modified, or rejected and why.

iii) Strengthen substantive inclusion beyond reserved representation. Affirmative-action mechanisms should be accompanied by measures addressing the practical barriers faced by women, youth, persons with disabilities, Indigenous communities and minority-language groups, including inaccessible public information, physical barriers, economic constraints and inadequate accommodation in civic processes.

e) **Uganda Communications Commission and Ministry of ICT and National Guidance**

i) Protect continuity of digital access. Any restrictions on internet or platform access should meet clear standards of legality, necessity, and proportionality, with independent oversight and transparent justification. Nationwide disruptions have consequences for civic participation, information access, service delivery and economic activity beyond the specific content being regulated.

ii) Strengthen safeguards for digital privacy and surveillance. Existing protections under the Data Protection and Privacy Act, 2019 should be matched by stronger transparency, oversight, and effective remedies governing communications interception and surveillance. The capacity of the Personal Data Protection Office to investigate complaints and enforce the law should continue to be strengthened.

iii) Close the digital access–usage gap. Expansion of communications infrastructure should be accompanied by measures addressing affordability, digital literacy, rural connectivity, reliable electricity and accessible technology for persons with disabilities. Public digital services should also retain workable alternatives for people and organisations unable to access online systems reliably.

To Civil Society Organisations

i) Diversify organisational funding by continuing to develop local fundraising, community philanthropy, membership contributions, partnerships with responsible businesses, social-enterprise models and other appropriate earned-income mechanisms to supplement external sources of institutional funding.

ii) Invest collectively in compliance capacity. CSOs, particularly smaller organisations, could share legal, financial, data-protection and regulatory expertise through networks rather than each organisation attempting to maintain all specialised capacity internally.

iii) Strengthen evidence-based engagement with government. Organisations should systematically document and publish submissions, requests for information, and consultation outcomes so that participation can be assessed against actual changes in policy and implementation rather than attendance alone.

iv) Improve downward accountability and public trust through accessible financial reporting, community feedback mechanisms, and transparent communication about funding sources, programme choices, and results.

v) Treat digital security as an organisational governance responsibility. CSOs should adopt basic security protocols, staff training, incident-response procedures, secure communications and data-minimisation practices, particularly where organisations handle sensitive information or work with vulnerable communities.

To Development Partners and Donors

i) Increase flexible, multi-year, and core funding, particularly for national, regional, and grassroots organisations, and allow reasonable provision for administration, staff development, security, compliance and institutional strengthening rather than only financing programme activities.

ii) Advance localisation through direct funding and decision-making power not only through implementation partnerships. Funding procedures should be proportionate to grant size and organisational capacity, with simpler application and reporting requirements for smaller organisations.

iii) Support funding diversification rather than abrupt localisation. Investment in local fundraising systems, community foundations, endowments and social enterprises should complement external financing while domestic resource bases develop.

iv) Provide adaptable protection mechanisms that allow organisations facing regulatory, physical, or digital threats to modify activities, budgets, payment mechanisms and security arrangements without losing funding.

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 panel for this report was convened in May 2026.** 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.

This publication was funded by the European Union. Its contents are the sole responsibility of the author and do not necessarily reflect the views of the European Union.



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