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LET'S WALK UGANDA REPORT

Critical Review of Uganda's Protection of Sovereignty Act, 2026

Implications for LGBTIQ Rights, Civil Society Organizing, and Resistance to Anti-Rights Movements in Uganda

1. Executive Summary

Uganda's civic space is already under significant strain, particularly following the implementation of the Anti-Homosexuality Act, 2023 (AHA-23), which has severely restricted organizing, advocacy, and access to protection for LGBTIQ persons and organizations. Against this backdrop, Uganda's Parliament passed the controversial Protection of Sovereignty Act, 2026 on May 5, 2026, amidst heated debate and heightened security measures. President Yoweri Museveni officially assented to the Bill on May 17, 2026, making it law.

The Act was enacted despite strong opposition from opposition Members of Parliament, civil society organizations, human rights defenders, and community activists who warned that it would further restrict freedoms of association, expression, assembly, and advocacy. The law mandates the registration and oversight of individuals and organizations deemed to be acting on behalf of foreign entities and criminalizes political activities considered to advance foreign interests without state authorization. Violations carry severe penalties, including substantial fines and prison sentences of up to ten years.

For Uganda's LGBTIQ community, the Act presents a particularly serious threat. Many LGBTIQ organizations and informal community networks depend on international solidarity, technical partnerships, and foreign funding to sustain critical services, including emergency protection, legal aid, healthcare access, psychosocial support, shelter, advocacy, and documentation of human rights violations. These already fragile support systems had been significantly weakened under AHA-23. The Protection of Sovereignty Act introduces additional restrictions that are likely to deepen fear, isolation, financial insecurity, surveillance, and criminalization within the movement, especially in a political environment where anti-LGBTIQ sentiment remains deeply entrenched in state institutions and public discourse.

This analysis examines the key provisions of the Protection of Sovereignty Act, 2026 and assesses their likely impact on LGBTIQ organizing, civic action, and broader efforts to resist far-right and anti-rights movements in Uganda. It further explores how the law may undermine the protection of marginalized communities, particularly the LGBTIQ community, by constraining access to resources, limiting advocacy space, and increasing the risks faced by activists, organizations, and community-led initiatives.



2. Persons and Entities Affected by the Protection of Sovereignty Act, 2026

The Protection of Sovereignty Act, 2026 broadly targets individuals, organizations, and institutions that are perceived to be acting on behalf of, collaborating with, or receiving support from foreign actors. The law's broad and vague definitions create significant uncertainty regarding who may fall within its scope, increasing the risk of selective enforcement and political misuse.

2.1. The categories most likely to be affected include:

2.1.1. Foreign Individuals and Entities

The Act applies to foreign governments, foreign organizations, foreign companies, international non-governmental organizations (INGOs), donor agencies, foundations, and other external actors operating or supporting activities within Uganda. These entities may be subjected to heightened state scrutiny, monitoring, and restrictions on engagement with local actors.

2.1.2. “Foreign Agents”

The law introduces the concept of “foreign agents,” which may include any individual or organization considered to be acting in the interests of a foreign principal. This could extend to civil society organizations, activists, researchers, consultants, journalists, lawyers, community organizers, and advocacy groups that receive international funding or maintain partnerships with foreign entities.

2.1.3. Civil Society Organizations and Human Rights Defenders

Organizations engaged in governance, democracy, accountability, human rights, social justice, or advocacy work are particularly vulnerable under the Act. Human rights defenders and grassroots activists may face increased surveillance, administrative burdens, and criminal liability for activities interpreted as advancing “foreign interests.”

2.1.4. Marginalized Communities and LGBTIQ Organizations

LGBTIQ organizations and informal community networks are among the groups most at risk. Many depend on foreign funding and international solidarity mechanisms to provide essential services such as emergency relocation, healthcare access, psychosocial support, legal aid, shelter, and documentation of abuses. The law may therefore disproportionately affect marginalized communities that already face hostility, exclusion, and criminalization under existing legislation such as the Anti-Homosexuality Act, 2023.

3. Key Requirements Introduced by the Act

The Protection of Sovereignty Act imposes several obligations and restrictions on persons and organizations that fall within its scope. These measures significantly expand state oversight over civic engagement, advocacy, and international collaboration.

3.1. Registration Requirements

The law requires individuals and organizations deemed to be acting on behalf of foreign entities to formally register with designated government authorities. Failure to register may constitute a criminal offense.

3.2. Disclosure Obligations

Affected entities may be required to disclose funding sources, partnerships, activities, contracts, communications, and relationships with foreign actors. These disclosure requirements raise serious concerns regarding privacy, confidentiality, and the security of activists and beneficiaries.

3.3 Prior Approval for Activities

The Act appears to require authorization or approval for certain forms of political engagement, advocacy, public campaigns, research, or activities that may be interpreted as influencing public opinion or state policy on behalf of foreign interests. This creates opportunities for arbitrary restrictions on civic participation and dissent.

3.4. Reporting and Submission of Returns

Organizations and individuals may also be required to submit periodic reports or returns to government authorities detailing finances, operations, and engagements with foreign entities.

These compliance obligations could impose heavy administrative and financial burdens, especially on grassroots organizations and informal movements.

3.5. Criminal Penalties

The Act criminalizes unauthorized political activities connected to foreign interests and provides harsh penalties for non-compliance, including heavy fines and imprisonment of up to ten years. The broad language of the law creates risks of intimidation, self-censorship, and selective prosecution.

4. Concerning Clauses

4.1. Registration of "Agents of Foreigners"

(Part III – Clauses 14–20)

One of the most concerning aspects of the Act is the requirement for individuals and organizations deemed to be acting on behalf of foreign entities to register as "agents of foreigners."

The law grants authorities broad powers to approve, deny, suspend, or revoke registration. The language used in the Act is broad and open to interpretation, creating the possibility of selective enforcement and political targeting.

4.1.2. Likely Impact on LGBTIQ Organizing

Many LGBTIQ organizations in Uganda receive support from international donors, regional networks, and global human rights institutions because domestic funding opportunities remain extremely limited due to stigma, discrimination, and political hostility. Under the new law, these organizations risk being labeled as foreign agents simply because they receive external support or collaborate with international partners.

4.1.3. This framing is deeply concerning because it:

- Recasts human rights advocacy as foreign interference rather than legitimate constitutional activism.
- Increases public suspicion toward organizations already facing hostility and misinformation.
- Creates legal uncertainty that may discourage organizing, coalition-building, and public engagement.
- Exposes activists and organizations to surveillance, intimidation, harassment, deregistration, or criminal prosecution.

Narratives portraying LGBTIQ advocacy as "foreign" or "un-African" have long been used by anti-rights actors to undermine the legitimacy of queer communities and human rights defenders. The Act risks reinforcing these narratives through state policy and legal structures.

4.2. Restrictions on Foreign Funding

(Part IV – Clauses 21–26)

The Act introduces strict controls on foreign funding, including mandatory declarations, reporting obligations, and limits on the amount of foreign funding organizations may receive without ministerial

approval.

4.2.1. Relevant Clauses

- **Clause 21** – Declaration of funding sources
- **Clause 22** – Cap on foreign funding
- **Clause 23** – Criminalization of funding linked to “disruptive activities”
- **Clauses 25–26** – Reporting and accountability obligations

4.2.2. Implications for the LGBTIQ Community

This section of the law presents one of the greatest operational threats to LGBTIQ organizations and community-led initiatives.

Many organizations supporting queer communities in Uganda already face barriers in accessing banking services, office space, public fundraising opportunities, and institutional partnerships. International support has therefore become essential for sustaining community services and advocacy efforts.

4.2.3. The restrictions introduced by the Act could result in:

- Closure or downsizing of community-based organizations
- Reduced emergency response and protection services
- Loss of safe shelters and psychosocial support programs
- Reduced legal assistance for individuals facing arrest or violence
- Limited access to HIV prevention and healthcare outreach
- Disruption of digital security and protection initiatives

The requirement for government approval for larger funding allocations also creates opportunities for political discrimination, particularly within institutions where homophobia and anti-rights attitudes are already entrenched. Authorities may selectively deny approval to organizations working on issues related to sexuality, gender identity, bodily autonomy, and broader human rights concerns.

At the same time, international donors may become increasingly hesitant to support Ugandan organizations due to concerns about legal exposure, reputational risk, or government retaliation. Similar trends were already observed following the enactment of AHA-23, and the Protection of Sovereignty Act is likely to intensify those challenges.

4.3. Restrictions on Advocacy and Policy Influence

(Part II – Clauses 5–13)

The Act places significant emphasis on protecting state sovereignty and limiting what it describes as foreign influence in governance, policymaking, and national affairs.

4.3.1. Relevant Clauses

- **Clauses 7–10** – Restrictions on foreign influence in policy processes
- Provisions relating to interference with governance, public administration, and national interests

4.3.2. Why This Matters

Human rights advocacy often involves engaging policymakers, participating in consultations, documenting violations, and advocating for legal reform. Under the Protection of Sovereignty Act, these activities may be interpreted as unlawful foreign influence when organizations receive international support or maintain global partnerships.

This creates a serious chilling effect on civic participation.

4.3.3. LGBTIQ organizations and allied human rights defenders may increasingly avoid:

- Public advocacy campaigns
- Strategic litigation
- Policy engagement
- International human rights reporting
- Research and documentation initiatives
- Media engagement and public communication

The result may be growing institutional silence at a time when vulnerable communities require stronger protection and visibility. The law effectively narrows civic space by creating fear around forms of advocacy that are recognized and protected under international human rights standards.

4.4. Expanded Surveillance and Government Oversight

(Part V – Clauses 28–29)

The Act grants authorities' powers to inspect organizations and introduce additional regulations governing compliance and operational activities.

4.4.1. Potential Risks

These provisions may enable:

- Increased monitoring of community organizations
- Raids on offices and community spaces
- Demands for confidential organizational records
- Surveillance of activists, staff, and beneficiaries
- Interference with private communications

4.4.2. For LGBTIQ communities, these risks are particularly severe.

Many queer Ugandans already face blackmail, family rejection, violence, eviction, arbitrary arrest, and forced outing. If organizations are compelled to disclose sensitive operational information, community members may face even greater exposure and danger.

4.4.3. This is especially concerning for:

- Safe houses and emergency shelters
- Health outreach programs

- Peer support initiatives
- Trauma counselling and mental health services
- Human rights documentation projects

The law therefore threatens not only advocacy work but also the safety, dignity, and privacy of individuals relying on these support systems.

5. Other implications

5.1. Public Health Implications

Beyond its impact on civic space and human rights organizing, the Protection of Sovereignty Act may also have serious public health consequences, particularly for already marginalized communities. Many LGBTIQ-led organizations in Uganda play a critical role in providing community-based health services that are often inaccessible through mainstream systems due to stigma, discrimination, and fear of criminalization. Restrictions on foreign funding, increased surveillance, and heightened regulatory pressures may disrupt HIV prevention programs, access to PrEP and ART support, sexual and reproductive health outreach, mental health services, and gender-affirming support systems. The law may also weaken emergency response mechanisms for displaced queer persons who rely on community shelters, crisis support, and referral networks for survival and protection. In an environment where many LGBTIQ individuals already avoid formal healthcare settings due to fear of exposure or mistreatment, the weakening of trusted community-led services risks deepening public health inequalities, increasing vulnerability to HIV and mental health crises, and further isolating individuals from life-saving care and support. Framing these concerns solely as matters of morality or politics overlooks the broader public health implications that affect community wellbeing, healthcare access, and social stability.

5.2. Strengthening Anti-Rights and Far-Right Narratives

The Protection of Sovereignty Act emerges within a broader political environment in which anti-rights rhetoric increasingly targets feminists, journalists, human rights defenders, and LGBTIQ persons.

Far-right and anti-rights actors in Uganda have consistently portrayed international human rights standards as threats to culture, religion, and national identity. By framing foreign support as suspicious or dangerous, the Act risks legitimizing and strengthening these narratives.

5.2.1. Likely Consequences

- Increased hostility toward civil society organizations
- Greater stigmatization of LGBTIQ persons
- Expansion of misinformation and propaganda campaigns
- Justification for state repression in the name of sovereignty
- Further weakening of democratic participation and dissent

The law may also isolate Ugandan activists from regional and international solidarity networks that have historically provided visibility, protection, emergency assistance, and advocacy support.

5.3. Impact on Safe Organizing and Community Resilience

Safe organizing has become increasingly difficult in Uganda since the enactment of the Anti-Homosexuality Act. Many activists now operate discreetly, avoid public visibility, and rely on informal community support systems to reduce risk.

The Protection of Sovereignty Act threatens to further shrink the limited spaces where communities can safely organize and mobilize.

5.3.1. Areas Most Likely to Be Affected

- Community convenings and trainings
- Emergency relocation and protection support
- Digital security initiatives
- Cross-border solidarity and partnership work
- Leadership development programs
- Grassroots mobilization efforts
- Youth and trans-specific programming

The cumulative impact of these restrictions may include long-term movement fatigue, burnout, fragmentation, and reduced capacity to respond effectively to violence, repression, and community emergencies.

There is also growing concern that the law could be used to target activists and organizations through criminal prosecution, prolonged legal battles, excessive financial penalties, restrictive compliance measures, or forced closure of organizations.

6. Conflict with the Constitution of Uganda

The Protection of Sovereignty Act, 2026 raises significant constitutional and human rights concerns because several of its provisions appear to conflict with key protections under the Constitution of Uganda and international human rights law. The law undermines *Article 1* by limiting democratic participation and public accountability; *Article 21* by enabling discriminatory targeting of groups such as human rights defenders, opposition actors, and LGBTIQ organizations; *Article 29* by restricting freedoms of expression, association, assembly, and advocacy; and *Article 38* by discouraging civic participation and engagement in public affairs. The Act may also violate Uganda's obligations under international and regional instruments, including the International Covenant on Civil and Political Rights (ICCPR), the African Charter on Human and Peoples' Rights, and the UN Declaration on Human Rights Defenders, all of which protect freedoms of association, expression, participation, equality, and access to resources for legitimate human rights work. Collectively, these concerns suggest that the law could further shrink civic space in Uganda by expanding state control over advocacy and restricting independent organizing and activism.

7. Recommendations for Civil Society and Community Organizations

We recommend the following;

7.1. Strengthen Legal and Compliance Preparedness

Organizations should review their registration status, governance systems, funding structures, and reporting procedures in order to reduce vulnerability to arbitrary enforcement and administrative targeting.

7.2. Prioritize Community Safety

Greater investment is needed in digital security, trauma-informed care, secure communications, confidential data management, and protection mechanisms for activists and community members. Existing community safety structures should also be strengthened and adequately supported so as to limit the negative impacts likely to be caused by the laws in question.

7.3. Diversify Funding Strategies

Where possible, organizations should explore local solidarity initiatives, regional partnerships, mutual aid models, social enterprise approaches, and decentralized community support mechanisms to reduce overreliance on a single funding stream.

7.4. Build Broader Alliances

The shrinking of civic space affects multiple social justice movements. Stronger collaboration among human rights organizations, feminist groups, health justice advocates, journalists, youth movements, and grassroots activists will be essential in building a collective and coordinated response.

7.5. Continue Documentation and Advocacy

Despite growing restrictions, documenting violations, preserving evidence, and engaging regional and international human rights mechanisms remain critical. These efforts, however, must be carried out strategically and with careful attention to community safety and risk management.

7.6. Petition Against the Law

Organizations and civil actors should take the bold step stand against this law by petitioning the constitutional court of Uganda for remedy .

8. Conclusion

The Protection of Sovereignty Act, 2026 represents a significant escalation in the restriction of civic space in Uganda. Although presented as a law intended to protect national sovereignty, many of its provisions risk criminalizing legitimate human rights work, undermining independent organizing, and isolating vulnerable communities from essential support systems.

For Uganda's LGBTIQ movement, the law threatens financial sustainability, organizational security, advocacy capacity, and community safety at a time when these protections are already under immense

pressure.

The long-term implications extend beyond LGBTIQ rights alone. The Act risks weakening democratic participation, restricting independent civil society, and empowering anti-rights forces seeking to silence dissent and marginalize vulnerable populations.

In this context, sustained solidarity, strategic adaptation, collective action, and community-centered resilience will remain essential in responding to the challenges created by this law.

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