

24th April, 2026

Position Paper

Subject: Impact of the Protection of Sovereignty Bill 2026 on Research and Academic Freedom in Uganda

1. Executive Summary

Research institutions fully support the goal of protecting Uganda's national sovereignty. However, the proposed Protection of Sovereignty Bill, 2026, presents unintended, catastrophic risks to scientific research, funding for local innovation, and international academic collaborations. This paper proposes mandatory amendments to safeguard national development through research.

2. Key Areas of Concern

- **Definition of "Foreign Agents":** The Bill risks classifying local researchers and Research NGOs receiving foreign grants as agents of foreigners, subjecting them to intense regulatory scrutiny, registration requirements, and potential 10-year prison sentences.
- **Registration (Clauses 14 - 17):** Every agent of a foreigner must register with the Department responsible for peace and security in the Ministry of Internal Affairs and obtain a certificate from the Minister. Certificates are valid for 2 years only and are subject to intrusive suitability inquiries of applicants. Acting without registration carries a fine of up to UGX 1 billion or imprisonment of up to 10 years, or both.
- **Foreign Funding Cap (Clause 22):**
No person or agent of a foreigner may receive foreign financial support exceeding UGX 400 million (20,000 currency points) in any 12-month period without prior written approval of the Minister of Internal Affairs. Funds received in contravention are subject to forfeiture to the State.
- **Funding Disclosure (Clause 21):** All agents of foreigners receiving foreign funding must submit a declaration of the source of funds to the Minister, and declarations are publicly available for inspection by any member of the public.
- **Banking Restrictions (Clause 25):** Banks and supervised financial institutions are prohibited from paying out any money to an agent of a foreigner without a funding source declaration and proof of Ministerial authorization. Non-compliant institutions face civil penalties of UGX 4 billion.
- **NGOs and INGOs:** The Bill requires the mandatory registration of all staff and implementing partners, ministerial pre-approval for all grants exceeding UGX 400 million, public disclosure of all foreign funding sources, and criminal liability for directors and officers of implementing organizations.
- **Academic and research institutions:** Policy research, economic analysis, and publications funded by foreign donors or produced in collaboration with international institutions are exposed to the policy development and implementation offenses under Clauses 7 and 8.
- **Implications:**
- **Stifling International Collaboration:** By creating administrative barriers and limiting foreign funds meant for research activities, the Bill may force institutions to

terminate vital collaborative studies, research, and programs, particularly in Health, HIV, and vaccines, among others.

- **Funding Uncertainty:** The potential criminalization of foreign funding could cause a massive outflow of research investment, reducing the capacity of Ugandan institutions to conduct research relevant to the country’s development in areas such as health, education, and humanitarian aid


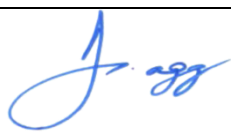


3. Recommendations for Amendment

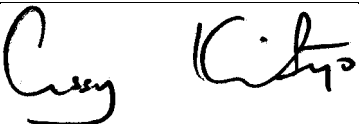



- **Explicit Exemptions for Research:** Insert a clause explicitly exempting legitimate research, academic, and non-profit collaborative activities from the definition of "activities of agents of foreigners."
- **Definition Clarification:** Narrow the definitions of "foreign agent" to focus strictly on political interference, protecting legitimate intellectual and developmental activities.
- **Streamlined Approval Processes:** Create a fast-track, transparent approval mechanism for foreign-funded research projects through a recognized national body and mechanisms that already exist (e.g., UNCST) rather than the Ministry of Internal Affairs, as highlighted by [UBA's opposition to the bill](#).

4. Conclusion

Research institutions recommend a balanced approach that protects sovereignty without stifling academic freedom and development. We request a wider stakeholder consultation to ensure the bill does not become an obstacle to national scientific progress.

Signed:

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