



FOR RELIGIOUS FREEDOMS

INTERNATIONAL CENTRE FOR RELIGIOUS ADVOCACY AND DEVELOPMENT
(ICRAD)

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and

REMNERANT IDENTITY COALITION (RIC)

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Contact: 0780197099

Kampala, Uganda

Date: 23rd April, 2026.

TO:

The Clerk to Parliament
Parliament of Uganda
Parliamentary Buildings
P.O. Box 7178
Kampala, Uganda

COPY:

The Chairperson
Joint Committee on Defence and Internal Affairs
and
Committee on Legal and Parliamentary Affairs
Parliament of Uganda
Kampala, Uganda

**RE: SUBMISSION OF MEMORANDUM ON THE PROTECTION OF SOVEREIGNTY
BILL, 2026 AND APPLICATION TO APPEAR BEFORE THE JOINT COMMITTEE ON
DEFENCE AND INTERNAL AFFAIRS AND COMMITTEE ON LEGAL AND
PARLIAMENTARY AFFAIRS**

We refer to the Public Notice issued by the Clerk to Parliament inviting submissions on the Protection of Sovereignty Bill, 2026, which was read for the First Time on Wednesday, 15 April 2026 and subsequently referred to the Joint Committee on Defence and Internal Affairs and the Committee on Legal and Parliamentary Affairs for detailed scrutiny.

Received
23/04/2026
0755 419 958
0414 377 155

We write to respectfully submit our memorandum on the Protection of Sovereignty Bill, 2026, in response to the public call for submissions issued by the Office of the Clerk to Parliament following the First Reading of the Bill and its referral to the Joint Committee on Defence and Internal Affairs and the Committee on Legal and Parliamentary Affairs. We further respectfully apply to appear before the Joint Committee on Defence and Internal Affairs and the Committee on Legal and Parliamentary Affairs to present and clarify the concerns and recommendations contained in our submission.

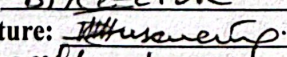
The International Centre for Religious Advocacy and Development (ICRAD), in collaboration with the Remnant Identity Coalition (RIC), presents this memorandum as part of its ongoing work to promote constitutional governance, religious freedom, and the constructive role of faith-based institutions in national development. We represent a broad and structured community comprising over 50,000 leaders of churches and places of worship, whose collective interests and operations are directly impacted by the subject matter of this bill.

The memorandum outlines key areas of concern and offers practical, evidence-based recommendations aimed at strengthening the Bill while ensuring alignment with constitutional principles, existing legal frameworks, and Uganda's international obligations.


In light of the foregoing, we most respectfully request that the Committee accords us the opportunity to appear before it and be heard in person, given that we represent a significant body of stakeholders whose interests stand to be substantially affected should the bill pass in its current form. We remain available for any further engagement or clarification that the Committees may require. **For further information or correspondence, kindly contact our legal representative, Advocate Simon Ssenyonga, via 0780197099 or ssenyon2@gmail.com**

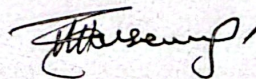
Yours faithfully,

**For and on behalf of:
Remnant Identity Coalition (RIC)**

Name: MUSEVENI VICENT
Title: DIRECTOR
Signature: 
Date: 23rd / 04 / 2026

**For and on behalf of:
International Center for Religious Freedom and Advocacy (ICRAD)**

Name: WILSON . K. PETER
Title: DIRECTOR
Signature: 
Date: 23.04.2026







MEMORANDUM TO THE JOINT COMMITTEE ON DEFENCE AND INTERNAL AFFAIRS AND THE COMMITTEE ON LEGAL AND PARLIAMENTARY AFFAIRS ON THE PROTECTION OF SOVEREIGNTY BILL, 2026

From:

International Centre for Religious Advocacy and Development (ICRAD)
In collaboration with the Remnant Identity Coalition (RIC)

Date:

23rd April 2026.

INTRODUCTION

The International Centre for Religious Advocacy and Development (ICRAD) is a policy and advocacy organisation committed to advancing religious freedom, constitutional governance, and the role of faith-based institutions in sustainable development. In collaboration with the Remnant Identity Coalition (RIC), a platform representing faith-based actors and religious communities, we respectfully submit this memorandum to support the Committee's review of the Protection of Sovereignty Bill, 2026.

Our concern arises from the manner in which several provisions of the Bill are framed, and the implications that may follow for religious institutions and faith-based actors if these provisions are applied without a clear distinction between harmful foreign interference and legitimate religious, charitable, and humanitarian activity. Religious organisations in Uganda are not only communities of belief but also major providers of education, healthcare, and social services. As such, regulatory frameworks that affect their operations must be precise, proportionate, and sensitive to their unique role.

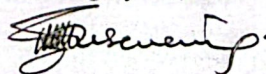
The purpose of this memorandum is to highlight specific concerns from a legal, constitutional, and religious freedom and faith-based institutional perspective, and to propose constructive amendments that safeguard both national sovereignty and constitutionally protected freedoms.

SUMMARY OF KEY ISSUES

Our review identifies the following central concerns:

- i. Overly broad definitions that may capture lawful religious, charitable, and personal activities
- ii. Lack of precision in provisions regulating "foreign interests" and "influence"
- iii. Restrictions that may limit constitutional rights to participation, expression, and association
- iv. Disproportionate criminal penalties for broadly defined conduct
- v. Administrative requirements that may hinder service delivery and economic activity
- vi. Risk of duplication with existing legal and regulatory systems
- vii. Potential infringement on constitutional protections of freedom of religion, association, and expression

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- viii. Practical risks of selective enforcement and disproportionate impact on religious communities

DETAILED ANALYSIS (CLAUSE-BY-CLAUSE)

General Observation

From a religious freedom perspective, the Bill introduces a regulatory framework that may extend into areas of worship, religious organisation, and faith-based service delivery. Without clear limits, provisions intended to address national security risks may inadvertently regulate or restrict ordinary religious life, charitable outreach, and international fellowship.

Recommendation: Refine the Bill to clearly distinguish between harmful foreign interference and legitimate religious activity, including worship, teaching, charitable work, and international religious collaboration.

Justification:

- (a) To protect constitutionally guaranteed freedom of religion and belief
- (b) To ensure that enforcement does not interfere with lawful religious practice and service delivery

Clause 1: Definition of “Foreigner” (Inclusion of Diaspora Citizens)

Under the Bill, a foreign agent is defined as any person acting as a representative or employee under the direction or control of a foreigner, or whose activities are directly or indirectly supervised or financed by a foreigner.

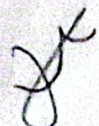
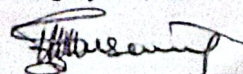
Religious communities in Uganda are deeply connected to diaspora members who contribute financially and spiritually to their home institutions. Classifying Ugandan citizens abroad as “foreigners” risks disrupting these relationships.

Recommendation: Delete the inclusion of Ugandan citizens residing abroad.

Justification: Citizenship is constitutionally protected and cannot be altered by residence. Diaspora engagement is central to sustaining many religious institutions and their community programmes. Under **Article 9** of the Constitution, citizenship by birth is an inherent right that cannot be stripped or modified by residence. Reclassifying them as foreigners is a legislative attempt to circumvent **Article 14**, which protects birthright citizenship from being lost.

Clause 3: Meaning of “Foreign Agent”

Discussion: The broad definition may result in churches, mosques, and faith-based organisations being classified as foreign agents simply because they receive international support, missionary assistance, or diaspora contributions. This risks stigmatising religious institutions and placing them under unnecessary regulatory scrutiny.





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Recommendation: Limit the definition to entities acting under the direction or control of foreign governments or political actors for political purposes. Explicitly exclude religious, charitable, and humanitarian activities.

Justification: Religious institutions operate independently in matters of faith and service, even where they maintain international affiliations. The law should not equate religious cooperation with political influence.

Clause 5: Prohibition of Promoting “Interests of a Foreigner”

Discussion: Religious organisations frequently engage in global networks, theological exchange, and humanitarian partnerships. Without clear definitions, these engagements could be interpreted as promoting foreign “interests.”

Recommendation: Define “interests” narrowly or remove the clause.

Justification: The current formulation risks restricting religious expression, teaching, and international collaboration, contrary to constitutional protections. Such a clause violates **Article 28(12)** of the Constitution (Principle of Legality) by being “void for vagueness”. It fails to differentiate between ordinary commercial advocacy and legitimate security threats, thereby creating a chilling effect on the Freedom of Expression guaranteed under **Article 29**.

Clauses 6, 7, and 8: Prior Approval for Provision of Services

Discussion: Faith-based organisations are among the largest providers of education, healthcare, and social services in Uganda. Requiring prior Cabinet approval may delay urgent interventions, particularly in underserved areas where religious institutions are often primary service providers.

Recommendation: Introduce clear timelines, objective criteria, and exemptions for established faith-based service providers.

Justification: Service delivery should not be hindered by administrative uncertainty, especially where it directly affects vulnerable communities.

Clause 7: Developing Alternative Policy without Cabinet Approval

Discussion: Religious leaders and institutions often contribute to public discourse on moral, social, and policy issues.

Recommendation: Delete the clause.

Justification: It restricts the ability of religious actors to engage in public dialogue and undermines their role in shaping ethical and social perspectives within society. This clause contradicts **Article 38**, which guarantees the right of citizens to participate in their governance.

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Clause 13: Offence of “Economic Sabotage”

Discussion: Religious organisations engage in economic activities such as running schools, hospitals, and community enterprises. Broad criminal provisions may create uncertainty and discourage such initiatives.

Recommendation: Delete or narrowly define the clause, and rely on relevant provisions within the Penal Code Act, Cap 120.

Justification: The provision may inadvertently affect legitimate faith-based economic activity and service provision given that it creates a disproportionate penalty of 20 years imprisonment for undefined conduct, that could capture legitimate religious activities that involve financial stewardship, teaching on economic matters, or sharing information that might influence community behaviour or markets. This undermines Article 40 (Right to a lawful trade) and raises concerns under protections for freedom of worship and association, as well as the broader right to conduct lawful economic activity. It may also weaken confidence among religious institutions and their members, who could become hesitant to engage in legitimate financial or educational outreach for fear of punitive consequences.

Clause 22: External Funding Restrictions

Discussion: Many religious institutions rely on international support to sustain their operations, including hospitals, schools, and humanitarian programmes.

Recommendation: Replace prior approval requirements with a transparent disclosure system under the Finance Intelligence Act (FIA).

Justification: Restricting funding flows may directly impact service delivery and disproportionately affect vulnerable populations served by faith-based institutions. This creates a parallel risk that routine faith-based economic activities may be subjected to unnecessary prior approval requirements under Article 40 on the right to trade. Many religious institutions engage in ordinary commercial transactions to support their operations, including managing donations, purchasing goods and services, operating schools, hospitals, or income-generating projects. If these activities are captured by a low transaction threshold and subjected to licensing-style approval, it could delay essential services and burden religious organisations with compliance processes that are not proportionate to their role. This would interfere with their ability to efficiently manage resources in support of worship, charity, and community service, and could indirectly constrain the practical exercise of freedom of religion.

Clause 23: “Disruptive Funding”

Discussion: Religious teaching, advocacy for social justice, and community mobilisation may be misinterpreted as influencing public processes.

Recommendation: Clearly define prohibited conduct and limit criminal liability to deliberate political interference.

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Justification: The clause violates **Article 28(12)** of the Constitution (Principle of Legality) by being "void for vagueness" Religious expression and advocacy should not be criminalised due to broad or vague definitions.

Clause 28 and Parts III & IV: Enforcement, Registration, and Disclosure

Discussion: Inspections without a warrant and extensive disclosure requirements raise concerns about intrusion into places of worship and religious spaces, which are traditionally protected as sanctuaries.

Recommendation: Require judicial oversight for inspections and ensure proportional, transparent registration processes with clear appeal mechanisms.

Justification: Protecting the sanctity and privacy of religious spaces is essential to freedom of worship.

PRACTICAL IMPLICATIONS

For religious actors, the Bill may result in:

- i. Classification of religious institutions as foreign agents due to international affiliations
- ii. Disruption of faith-based healthcare, education, and humanitarian services
- iii. Increased regulatory burden on places of worship
- iv. Reduced international partnerships and mission work
- v. Risk of selective enforcement affecting certain religious communities
- vi. Hesitation in religious teaching and public engagement due to fear of sanctions

CONCLUSION

The Protection of Sovereignty Bill, 2026 addresses an important national objective. However, as currently drafted, several provisions are overly broad, insufficiently defined, and potentially inconsistent with constitutional protections and practical realities.

From the perspective of religious freedom and faith-based institutional engagement, the Bill in its current form presents significant risks of unintended interference with lawful religious activity and service delivery. While the objective of protecting national sovereignty is legitimate, it is essential that the legislative framework carefully distinguishes between genuine security threats and lawful religious and humanitarian engagement.

We respectfully recommend that the Bill be deferred to allow inclusive nationwide consultations and a formal constitutional compliance review before further progress. Substantively, the framework should be simplified and aligned with constitutional protections by narrowing the definition of "foreign agent" to only those acting under foreign government direction for political purposes, while excluding humanitarian, educational, religious, and diaspora-related activities. Provisions that may affect participation, expression, preaching, social services, and

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legitimate external funding should be refined to prevent unintended restrictions on lawful religious and community work.

We also recommend replacing prior approval and licensing-style controls with proportionate, transparent regulation supported by clear registration and appeal mechanisms. Enforcement should rely primarily on administrative sanctions, with custodial penalties reserved strictly for serious, deliberate state-directed subversion. Strong judicial safeguards should be introduced, including court oversight of designations and inspections, alongside limits on ministerial discretion. Overall, the Bill should be harmonised with existing laws to reduce duplication and ensure a balanced, predictable, and rights-compliant regulatory framework.

We submit this memorandum in good faith and in the spirit of constructive engagement. We, therefore respectfully urge the Committee to adopt a balanced approach that protects national sovereignty while safeguarding the essential role of religious institutions in Uganda's social, moral, and developmental landscape.

For further information or correspondence, kindly contact our legal representative, Advocate Simon Ssenyonga, via 0780197099 or ssenyon2@gmail.com

SIGNATORIES

For and on behalf of:

Remnant Identity Coalition and International Center for Religious Freedom and Advocacy (ICRAD)

Name: Simon Ssenyonga

Title: Director

Signature: [Handwritten Signature]

Date: 23-04-26

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