



STRATEGIC FRAMEWORK
CIVIC SPACE RESILIENCE & COMPLIANCE ARCHITECTURE
(2026–2029)

Responding to the Protection of Sovereignty Act, 2026

**Target Audience: Uganda CSO Representatives, Regional Networks, and
Strategic Partners**

Acknowledgement

On behalf of Justice Access Point (JAP) and our partner organizations, we extend sincere appreciation to all Civil Society Organizations (CSOs), regional networks, and strategic partners who contributed to the development of this Strategic Framework on Civic Space Resilience and Compliance Architecture (2026–2029).

This framework reflects the valuable insights shared during the JAP CSO Workshop at Arch Apartments, Ntinda, on 18th September 2026, and the contributions of community leaders, legal practitioners, and regional CSOs that ensured its relevance to Uganda’s evolving civic space.

We particularly acknowledge Public Affairs Centre (PAC), who worked with JAP in a consortium to leverage opportunities for CSO engagement in the campaign on the Protection of Sovereignty legislation, and JAP’s strategic partner Civic Advisory Hub (CAH), whose role in the campaign was pivotal.

The collective effort invested in shaping the six pillars and eight Work streams demonstrates shared ownership and a unified vision. The emphasis on institutional engagement, grassroots mobilization, and sector alignment reflects our joint commitment to safeguard democratic space, strengthen compliance, and sustain public legitimacy.

This framework stands as a testament to the sector’s resilience, collaborative spirit, and resolve to master the Protection of Sovereignty Act while advancing civic resilience in Uganda.

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1. Executive Summary & Strategic Imperative

The enactment of the Protection of Sovereignty Act, 2026 by the Parliament of Uganda represents a structural shift in the operating environment for Civil Society Organizations (CSOs), Non-Governmental Organizations (NGOs), and civic actors. Operating alongside concurrent regulatory frameworks—including the NGO Bureau, the Uganda Registration Services Bureau (URSB), the Financial Intelligence Authority (FIA), and the Data Protection Office—the Act introduces heightened compliance standards, strict reporting obligations, and complex statutory definitions regarding foreign funding and representation.

Synthesizing recommendations from the consultative feedback sessions held with regional CSOs, legal practitioners, and community leaders—most recently the CSO workshop convened at Arch Apartments, Ntinda, on 18 September 2026—this framework shifts civil society from reactive, ad-hoc awareness campaigns toward an outcome-driven Civic Space Resilience & Compliance Architecture. The workshop confirmed that the risks identified in the framework are real and, in most cases, high; that the binding constraint is implementation rather than the existence of law; and that the sector’s first task is to organize itself, understand the Act, and speak with one voice.

This document is a sector-level framework rather than an organizational strategy. It sets out the shared objectives, priority areas, activities, indicators, and coordination arrangements through which Ugandan civil society will respond to the Protection of the Sovereignty Act 2026. It is intended to be adopted collectively by the sector and delivered through the workstreams and governance structures set out below.

Strategic Logic

The sector’s response is structured around an integrated operational logic:

Legal Literacy → Compliance Capacity → Regulatory Surveillance → Evidence Generation → Strategic State Engagement → Judicial Advocacy → Public Mobilization → Unified National Coordination.

2. Core Strategic Pillars & Objectives

The framework is organized around five strategic pillars. Each pillar states the outcome it pursues and the strategic approach through which that outcome is delivered. The pillars were presented to, and endorsed by, CSO stakeholders at the 18 September 2026 workshop.

Pillar	Objective	Strategic Approach
PILLAR 1 Organizational Compliance & Legal Safety	Eliminate operational vulnerabilities and prevent administrative overreach or forced closures by raising statutory compliance and legal literacy across national and regional CSOs.	Transition from generic sensitization to practical, tailored legal guidance. Develop clear operational frameworks regarding the Act's activity-based test on foreign funding—distinguishing permissible development assistance from regulated political activities. Clarify whether obligations attach to all CSOs or only to those within the Act's scope, and ensure no organization is inadvertently registered as a foreign agent.
PILLAR 2 Regulatory Surveillance & Early Warning	Establish continuous monitoring of statutory enforcement and administrative practices to provide real-time risk intelligence to the sector.	Centralize regulatory intelligence across competing oversight bodies (NGO Bureau, URSB, FIA, Data Protection Office) to detect systemic enforcement trends, circulars, and administrative practices before they result in sectoral disruption.
PILLAR 3 Evidence-Based Legal Reform & Strategic Litigation	Narrow ambiguous statutory language and contest constitutionally problematic provisions using empirical evidence and legal advocacy.	Execute a dual-track strategy: engaging Parliament and regulatory authorities for administrative guidelines and amendments (Track A), while assembling a test-case portfolio for constitutional challenges and judicial review against ambiguous provisions (Track B).
PILLAR 4 Grassroots Support & Public Legitimacy	Reframe civic space defence as a fundamental constitutional right and public interest, expanding ownership beyond urban, formal CSOs.	Operationalize Sovereignty Protection Uganda (SPU) as a citizen-led advocacy platform to lead community dialogues, empower regional networks, and build broad-based civic consciousness. Popularize the Act in local languages and through simplified materials, working with local leaders and the Law Reform Commission.
PILLAR 5 Sector Alignment & Financial Sustainability	Unify the civil society voice under a joint coordination framework and reduce exposure to foreign funding restrictions through domestic resource diversification.	Institutionalize joint advocacy, shared legal defence infrastructure, and alternative local resource mobilization mechanisms to insulate core civic operations. Build lasting, transparent relationships with donors and establish a citizens' platform for structured donor engagement.

3. Operational Workstreams & Programmatic Delivery

To deliver on these pillars, operations are organized into six interconnected workstreams anchored by Justice Access Point (JAP) and partner organizations. The final column records how the inputs of the 18 September 2026 workshop have been integrated into each Workstream.

Workstream	Key Deliverables & Core Actions	Workshop Inputs Integrated
1. Legal Literacy & Compliance Enhancement	- Protection of Sovereignty Act Legal & Compliance Guide - Regional Compliance Training & Helpdesk. - Audits of Organizational Risk Profiles. - Abridged fact sheets and plain-language briefings	Proceed carefully and avoid registering as foreign agents; clarify whether obligations apply to all CSOs or only to those within the Act's scope; provide refresher compliance engagements; distribute abridged versions and fact sheets to stakeholders.
2. Legislative & Regulatory Monitoring	- Centralized Civic Space Legislative Monitoring Mechanism - Quarterly Regulatory Trend Analysis & Early Warning Alerts - Tracking of NGO Bureau, URSB, FIA & Data Protection circulars	Establish the extent to which CSOs must register and whether this is general or specific to the Act; maintain and update the statutory regulatory bodies' guidance.
3. Legal Analysis & Rights Impact Assessment	- Provision-by-Provision Rights Impact Assessment - Empirical Evidence Dossiers on Implementation Effects - Legal Briefings for Parliamentary & Judicial Engagement	The problem is not the laws but their implementation; the institutions responsible are not performing; civil society should be called upon to popularize the laws, since many citizens are unaware they exist; pursue structured engagement with the relevant Ministries, Departments and Agencies (MDAs).
4. Public & Grassroots Mobilization (SPU Platform)	- Operationalization of the Sovereignty Protection Uganda (SPU) platform - Regional Community Dialogues & Media Campaigns - Simplified Public Education Materials in local languages	Make information accessible in simple language that communities understand; involve local leaders; secure the participation of the Law Reform Commission; empower ordinary citizens to drive the sovereignty agenda through citizens' platforms.
5. Strategic Litigation & Policy Advocacy	- Track A: Structured Dialogue with NGO Bureau, FIA, and URSB - Track B: Constitutional Challenges & Judicial Review Filings - Model Legislative Amendment Proposals	The line Ministry (Ministry of Internal Affairs) must not be left out and should be engaged more regularly; bring the Ministry of Justice and Constitutional Affairs on board; be mindful that MDAs have limited financial resources; pursue legal redress so that the Constitution is not violated.
6. National Coordination & Sustainability Framework	- National CSO Coordination Framework & Steering Committee - Joint Domestic Resource Mobilization Strategy - Shared Legal Defence Fund Mechanisms	Clarify how individual CSOs can participate meaningfully alongside operational organizations; address how CSOs can engage donors who are now cautious; build lasting relations with donors; learn from peer organizations such as Chapter 4, ACORD, and the NGO Forum.

4. Implementation Phasing & Indicative Timeframes

Implementation follows a logical operational sequence based on thematic milestones and urgency rather than a rigid calendar. The indicative timeframes below are provided so that the framework can be monitored and reported against; they are proposals for the author's confirmation and should be adjusted to the sector's actual capacity and the Act's implementation timetable.

Phase 1: Defensive Strengthening & Institutional Setup

Indicative timeframe: Q4 2026 – Q1 2027

Produce and distribute a plain-language legal briefing and abridged fact sheets on the Protection of Sovereignty Act, 2026.

- Establish the centralized legislative and regulatory monitoring desk to track administrative circulars and compliance trends.
- Conduct initial regional compliance sessions for high-risk grassroots and regional CSOs.
- Assemble the joint CSO Legal Defence Taskforce to conduct a provision-by-provision statutory risk audit.
- Convene the sector to organize itself around the Act, in line with the workshop's first recommendation.

Phase 2: Institutional Engagement & Broad Mobilization

Indicative timeframe: Q2 2027 – Q4 2027

- Initiate structured, evidence-based dialogues with state regulators (NGO Bureau, FIA, URSB, Data Protection Office) to seek formal administrative clarifications and interpretive guidance.
- Extend structured engagement to the Ministry of Internal Affairs and the Ministry of Justice and Constitutional Affairs.
- Fully operationalize the Sovereignty Protection Uganda (SPU) platform, launching regional community dialogues and public awareness campaigns in local languages.
- Draft legislative amendment proposals targeting overbroad and ambiguous clauses.
- Compile an empirical evidence base documenting early implementation effects on civil society operations.

Phase 3: Strategic Litigation & Sector Sustainability

Indicative timeframe: 2028 – 2029

- File targeted test-case litigation and constitutional challenges against provisions that violate guaranteed fundamental rights.
- Institutionalize the National CSO Coordination Framework as a permanent mechanism for joint advocacy, shared legal defence, and state engagement.
- Deploy alternative domestic resource mobilization models to reduce structural reliance on foreign funding streams subject to statutory restrictions.
- Consolidate donor relationships and the citizens' platform for structured donor engagement.

5. Monitoring, Evaluation & Learning Framework

The draft framework contained no monitoring and evaluation provisions. The indicators below are proposed to make the strategy accountable and reviewable. Baselines marked “[TO BE DETERMINED]” (TBD) requires a sector-wide baseline survey or the author’s confirmation before adoption.

Pillar	Indicator	Baseline	Target	Means of Verification	Frequency
1. Compliance & Legal Safety	Number of CSOs reached with legal literacy and compliance training	(TBD)	(TBD)	Training registers; helpdesk logs	Quarterly
1. Compliance & Legal Safety	Number of organizational risk-profile audits completed	0	(TBD)	Audit reports	Semi-annual
2. Regulatory Surveillance	Number of regulatory trend analyses and early-warning alerts issued	0	4 per year	Published alerts; monitoring desk records	Quarterly
2. Regulatory Surveillance	Number of administrative circulars tracked and analysed	0	(TBD)	Monitoring database	Quarterly
3. Evidence & Legal Reform	Provision-by-provision rights impact assessment completed and disseminated	0	1	Published assessment	Once (Phase 1–2)
3. Evidence & Legal Reform	Number of formal engagements with Parliament and regulators	0	(TBD)	Meeting minutes; submissions	Semi-annual
4. Grassroots & Public Legitimacy	Number of regional community dialogues held	0	(TBD)	Dialogue reports; attendance lists	Quarterly
4. Grassroots & Public Legitimacy	Number of simplified materials produced in local languages	0	(TBD)	Published materials	Semi-annual
5. Sector Alignment & Sustainability	National CSO Coordination Framework formally adopted and operational	Not adopted	Adopted and operational	Adoption resolution; committee records	Annual
5. Sector Alignment & Sustainability	Share of core operations funded from domestic sources	(TBD)	(TBD)	Financial reports	Annual

A mid-cycle review will be conducted at the end of Phase 2, and a final evaluation at the end of Phase 3. Learning from each phase will be fed back into the following phase and into the annual review of this framework.

6. Risk Management Framework

The workshop reviewed the four risks in the draft framework, confirmed that they are real, and recommended that the risk of civil society fragmentation be treated as the first and most urgent. The table below reflects that reordering and adds risks identified during discussion.

#	Risk Description	Severity	Likelihood	Mitigation Strategy	Owner
1	Fragmentation of Civil Society: Divergent strategies between urban-based advocacy CSOs and regional service-delivery NGOs.	High	High	Institutionalize the National CSO Coordination Framework with balanced regional representation and joint decision-making structures. Prioritize sector self-organization and shared understanding of the Act before other actions.	National CSO Strategy Steering Committee
2	Arbitrary Deregistration or Enforcement: Selective application of the Act against vocal advocacy organizations.	High	High	Establish an emergency legal defence desk; deploy standardized compliance toolkits to ensure technical adherence to reporting requirements.	CSO Legal Defence Taskforce
3	Misinterpretation of Foreign Funding Rules: Regulatory bodies treating all external development grants as prohibited foreign influence.	High	Medium	Engage in proactive, legally precise advocacy framing the activity-based test; secure formal administrative guidelines from relevant state agencies.	CSO Legal Defence Taskforce
4	Public Apathy / Misinformation: State narratives successfully framing civil society as foreign agents working against national sovereignty.	High	Medium	Utilize the SPU platform to reframe civic space defence as a citizen-centric issue tied to local public goods, community rights, and democratic oversight.	SPU Grassroots Coordination Desk
5	Risk within risks: Over-engineered compliance and defensive measures creating new exposure, cost, and administrative burden for smaller organizations.	Medium	High	Apply proportionality: standardize toolkits, publish them online, and avoid duplicating structures. Focus on practical activities that reduce rather than multiply risk.	National CSO Strategy Steering Committee
6	Donor withdrawal and funding contraction: Donors reducing or suspending support because of the regulatory environment.	High	Medium	Build lasting, transparent donor relationships; establish a citizens' platform for structured donor engagement; diversify toward domestic resource mobilization.	National CSO Strategy Steering Committee
7	Security-agency misunderstanding of the CSO mandate: Security actors misreading lawful civic activity as a sovereignty threat.	Medium	Medium	Engage security agencies to build mutual understanding of the environment in which CSOs operate; conduct advocacy in a measured manner that cannot be misrepresented.	National CSO Strategy Steering Committee

7. Governance, Coordination & Follow-Up

To maintain strategic alignment and operational efficiency across the sector, implementation is governed by three complementary structures.

a) National CSO Strategy Steering Committee

Co-chaired by Justice Access Point (JAP) and representative regional network leaders, responsible for overall policy direction, high-level state engagement, and strategic litigation approvals. The Committee also owns the coordination and follow-up function: it convenes the sector, tracks delivery against the workstreams and indicators in §3 and §5, and reports to the sector at the annual review.

b) CSO Legal Defence Taskforce

Composed of human rights lawyers, constitutional experts, and compliance officers, tasked with drafting legal briefings, conducting impact assessments, and managing court filings.

c) SPU Grassroots Coordination Desk

Responsible for managing community dialogues, regional campaign networks, and public media engagements under Pillar 4.

Coordination and Follow-Up Mechanisms

- Quarterly coordination meetings of the Steering Committee, with regional network representatives reporting on Workstream delivery.
- A shared monitoring dashboard tracking the indicators in §5, maintained by the Steering Committee secretariat.
- Annual sector review and framework review, with a mid-cycle review at the end of Phase 2.
- A standing channel for peer learning with organizations such as Chapter 4, ACORD, and the NGO Forum, so that lessons are shared rather than re-learned.

8. Resource Mobilisation & Sustainability

The draft framework did not address the resources required to deliver it. This section identifies the resource streams and the items to be determined. No budget figures are proposed here, because they depend on decisions that only the author and the adopting body can make.

- Domestic resource mobilization: develop diversified domestic funding models to reduce reliance on foreign funding streams subject to statutory restriction.
- Shared legal defence fund: establish a pooled fund to finance test-case litigation and emergency legal defence.
- Donor engagement: build lasting, transparent relationships with donors and establish a citizens' platform for structured engagement on compliance.
- In-kind and peer support: draw on the expertise of peer organizations and pro bono legal practitioners.

Items to be determined: the total budget envelope, the contribution expected from JAP and from partner organizations, and the named funding partners are all (TBD).

9. Items to Be Determined

The following points are to be determined by the author or the adopting body. They have deliberately not been filled with invented values.

#	To be determined	Where it appears
1	Date of issue and date of adoption of this framework	Document Control; §1
2	Name of the adopting body and the approval process	Document Control
3	Confirmation of the indicative timeframes for Phases 1–3	§4
4	Baseline values and targets for the indicators	§5
5	Total budget envelope and the contribution expected from JAP and partners	§8
6	Named funding partners and donor-engagement arrangements	§8
7	Exact statutory citation for the ambiguous clause referred to as “Sub-clause (f)” (section and sub-clause number of the Protection of Sovereignty Act, 2026)	§2, Pillar 3; §3, Workstream 5
8	Confirmation of the official name and scope of the SPU platform	§2, Pillar 4; §3, Workstream 4
9	Named partner organizations and their roles beyond JAP	§3; §7
10	Whether the framework is to be published publicly or held as an internal sector document	Document Control

Annex A: Workshop Recommendations Register

This annex records every recommendation and policy finding from the CSO workshop of 18 September 2026 and states where it has been integrated into the framework.

#	Workshop recommendation / finding	Integrated at
1	Risk 3 (fragmentation) should be treated as risk 1 — CSOs must organize themselves and understand all the provisions of the Protection of the Sovereignty Act 2026 first.	§6, Risk 1
2	The risks are real and most are high; they cannot all be mitigated in the short term.	§6 (severity/likelihood ratings)
3	Focus on practical activities to avoid “risk within risks”.	§6, Risk 5
4	Deploy standardized compliance kits and put them online.	§6, Risk 5; §3, Workstream 1
5	Utilize and update the statutory regulatory bodies’ guidance.	§3, Workstream 2
6	Engage the line Ministry and other government agencies to build a uniform understanding of the Act.	§3, Workstream 5; §4, Phase 2
7	Funding restrictions create poor service delivery and unemployment, and violate constitutional rights.	§1; §2, Pillar 3
8	There is a need for refresher engagement on compliance with the protection of the Sovereignty Act 2026.	§3, Workstream 1
9	There is a need for legal redress so that the Constitution is not violated by government and security actors.	§2, Pillar 3; §3, Workstream 5
10	Produce abridged versions and fact sheets for stakeholders.	§3, Workstream 1; §4, Phase 1
11	Popularize the Act in local languages.	§2, Pillar 4; §3, Workstream 4
12	Increase awareness of the abridged version among relevant stakeholders.	§3, Workstream 1; §4, Phase 1
13	Work on the bigger thing first, without forgetting the smaller ones.	§4 (phasing logic)

14	Stand out on our strategies and defend them before those who may not know them.	§1; §7
15	Have strategic engagement with line ministries and government officials.	§3, Workstream 5; §4, Phase 2
16	Learn from other CSOs such as Chapter 4, ACORD, and the NGO Forum to remain relevant, resilient, and compliant.	§3, Workstream 6; §7
17	Build capacity in advocacy work, as individuals and organizations.	§3, Workstream 1
18	Engage relevant stakeholders in advocacy and in understanding the Act.	§3, Workstream 1 and 5
19	Apply proactive advocacy and engagement.	§1, Strategic Logic; §4
20	Human rights defenders should stand firm on principles.	§1
21	Avoid dramatic actions that could be misunderstood.	§6, Risk 7
22	Engage security agencies so they understand the environment CSOs operate in.	§6, Risk 7
23	Establish a citizens' parliament to engage donors on compliance with the Act.	§2, Pillar 5; §8
24	Be compliant: accountability, registration with URSB, NGO Forum, and other bodies.	§2, Pillar 1; §3, Workstream 1
25	Avoid registering as foreign agents; be clear whether obligations apply to all CSOs or only to those within the Act's scope.	§2, Pillar 1; §3, Workstream 1
26	The problem is not the laws but their implementation; the responsible institutions are not performing.	§3, Workstream 3
27	Civil society should be called upon to popularize the laws, since many citizens do not know they exist.	§3, Workstream 3 and 4
28	Make information accessible in simple language; involve local leaders.	§3, Workstream 4
29	The Law Reform Commission should participate.	§2, Pillar 4; §3, Workstream 4
30	Empower ordinary citizens to drive the sovereignty agenda through citizens' platforms.	§2, Pillar 4
31	The line Ministry (MOIA) must not be left out; engage it more regularly. Bring MOJCA on board.	§3, Workstream 5; §4, Phase 2
32	Be mindful that MDAs have limited financial resources.	§3, Workstream 5
33	Clarify how an individual can participate meaningfully with operational CSOs.	§3, Workstream 6
34	Address how CSOs can engage donors who are now cautious, and build lasting donor relations.	§3, Workstream 6; §8
35	Clarify the extent to which CSOs must register, and whether this is general or specific to the Act.	§3, Workstream 2

— End of Framework —