



UGANDA
KEY POPULATIONS
CONSORTIUM

Frequently Asked Questions on the Protection of Sovereignty Bill, 2026

April, 2026

Does the Bill apply to my organisation?

Almost certainly yes, if you receive funding, technical assistance or in-kind support from any of the donors that fall within the definition of a foreigner, whether through a direct grant or subgrant or sub-subgrant or if you subgrant from any organisation that does. The definitions in clause 1 operate transitively and capture both direct and indirect relationships.

We hold an NGO Bureau permit. Does that exempt us?

The carve-outs in clauses 6(5) and 8(7) extend to persons granted *“a licence, permit or other authorisation from a Government licensing or regulatory body”*. The scope of that carve-out in relation to an NGO Bureau permit has not been tested. UKPC Legal and Corporate Affairs will publish a guidance note on the carve-out once the regulations are available.

How does the UGX 400 million threshold work?

Clause 22(1) prohibits receiving more than 20,000 currency points (UGX 400 million) from a foreigner in any twelve-month period without the Minister's written approval. The threshold counts cash and in-kind support, direct and indirect receipts, and all receipts from a single foreigner summed across the period. Structuring to defeat the threshold carries the same penalty as a direct breach.

Can we carry on paying staff salaries?

Paying staff out of an approved budget to deliver an approved programme is not, of itself, an offence. However, if the underlying funding has not received Ministerial approval where required under clause 22, or the programme has not received the approvals required under clauses 6 and 8, the staff activity may be characterised as a “*disruptive activity*” under clause 1. Members should not assume safe harbour.

What is the position of our directors?

Under clause 23(3), directors and executive heads of legal entities are deemed to have committed the offence of obtaining funds for disruptive activities committed by their entity. Ordinary principles of corporate criminal liability apply to other offences. Board members should consider their exposure, the scope of their D&O insurance, and the adequacy of governance documentation as priorities.

What about our bank accounts?

Clause 25 requires supervised institutions to verify the source of funds and ministerial approval before paying out to an agent of a foreigner. Banks may tighten KYC checks, require documentation, extend clearance timelines, or, in some cases, exit relationships. Members should engage their banks in writing now.

What can our donors do?

Donors should be encouraged to support constructive engagement with Government, avoid decisions that de-fund communities, and coordinate with UKPC so that any adjustments to grant terms reflect a shared understanding of the Ugandan legal position.

Where can I get further advice?

Legal and Corporate Affairs, Uganda Key Populations Consortium: compliance@ugandakpc.org. For tailored advice, members should also engage counsel of their choice.



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