

Mandates of the Special Rapporteur on the situation of human rights defenders; the Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression and the Special Rapporteur on the rights to freedom of peaceful assembly and of association

Ref.: AL UGA 2/2026
(Please use this reference in your reply)

26 March 2026

Excellency,

We have the honour to address you in our capacities as Special Rapporteur on the situation of human rights defenders; Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression and Special Rapporteur on the rights to freedom of peaceful assembly and of association, pursuant to Human Rights Council resolutions 52/4, 52/9 and 59/4.

In this connection, we would like to bring to the attention of your Excellency's Government information we have received concerning the **allegedly arbitrary suspension of permits for a number of human rights organizations, in the context of the national elections on 15 January 2026**.

National Coalition of Human Rights Defenders Uganda is a membership organisation that coordinates and promotes collaboration amongst its members to advance the safety and protection of human rights defenders in the country. Established in 2013, the membership is comprised of more than 200 registered organisations.

Chapter Four Uganda is a non-governmental organisation that advocates for the protection of civic space, equality and non-discrimination and promotes criminal justice reform. It provides pro-bono legal support and files strategic and public interest cases, and conducts investigations into alleged human rights violations.

Alliance for Finance Monitoring (ACFIM) is a pan-African watchdog organisation that monitors political financing. The organization is based in Kampala and advocates for inclusive, transparent, and accountable financing of politics and public institutions, as well as peaceful elections and the rights of citizen observers.

The **Center for Constitutional Governance (CCG)** is a non-governmental organisation that promotes the rule of law, electoral based integrity, civic education and accountability.

Concerns regarding alleged threats, intimidation and enforced disappearances of human rights defenders and journalists in the lead up to the general elections on 15 January 2026, as well as the alleged use of disproportionate and unnecessary use of force by security forces during electoral campaigns, were raised by a number of Special Procedures mandate holders with Your Excellency's Government in a communication sent on 19 December 2025 (AL [UGA 6/2025](#)). Furthermore, concerns regarding the arrest and indictment of woman human rights defender and director of the CCG, Dr. Sarah Bireete, were the subject of a communication sent to your Excellency's Government by three Special Procedures mandate holders on 16 January 2026 (AL

[UGA 1/2026](#)). We thank your Excellency's Government for its replies to these communications.

According to information received:

On 9 January 2026, the Uganda National Bureau for NGOs issued individual letters to the National Coalition of Human Rights Defenders Uganda, Chapter Four Uganda, the Alliance for Finance Monitoring (ACFIM), the Center for Constitutional Governance (CCG) and five other non-governmental organisations, stating that their respective permits had been suspended and ordered them to cease all operations with immediate effect. The letters alleged that the National Bureau for NGOs had received "intelligence information" that the organisations in question were "engaged in activities which are prejudicial to the security and laws of Uganda contrary to section 42(2) of the NGO Act Cap 109", and that an investigation had been initiated into the matter. The letters to each of the organisations included identical wording and stated that the investigations would be concluded "within reasonable time" and that they would be "given the opportunity to be heard during the said investigations".

On the same day, the National Bureau for NGOs issued a letter to the Executive Bankers Association, informing it of the 10 CSOs "whose operations have been halted/and or suspended on allegations of engaging in activities prejudicial to the security and laws of Uganda". In response, the bank accounts of all 10 NGOs were frozen by the bank indefinitely.

On 23 January 2026, the Executive Director of the National Bureau for NGOs attended an engagement between the Ministry of Internal Affairs and the parliamentary Defence and Internal Affairs Committee. In response to a question asked by a lawmaker about the suspension of the permits, the Executive Director stated that the suspensions were "precautionary" and that investigations were ongoing.

Following the suspension, some of the affected organisations wrote to the National Bureau for NGOs to meet to discuss the matter.

On 27 January 2026, a delegation from Chapter Four met with representatives of the National Bureau for NGOs at its office in Kampala. During the meeting, Chapter Four members expressed their concern regarding the permit suspension and requested further information regarding its basis and specific information regarding the allegations against the organisation.

On 29 January 2026, a delegation from ACFIM met with a representative of the Bureau. The members of ACFIM requested further information from the representative as to the basis of the suspension. The representative reportedly refused to provide any specific information, making reference to alleged intelligence information, to which he was not privy. He noted that the investigations were ongoing and that the organisation's offices must remain closed.

On 9 February 2026, the HRD Coalition met with a representative of the National Bureau for NGOs. During the meeting, the representative reportedly advised the HRD Coalition to submit a formal, written request to seek clearance for certain administrative costs to be processed, such as salaries, rent and any outstanding financial obligations with service providers. Upon receipt and review of the request, the National Bureau for NGOs stated it would instruct the bank to release such funds.

On 20 February 2026, the HRD Coalition submitted its request to the National Bureau for NGOs, to seek clearance for the payment of staff salaries, in line with the guidance it had received.

On 26 February 2026, the National Bureau for NGOs issued a letter to the bank of the HRD Coalition, authorizing it to allow for the salaries of the organization's staff to be paid, but only for the three-month period of March – May 2026. Information was not provided as to the payment of staff salaries past his period.

Without wishing to prejudge the accuracy of the information received, we wish to express serious concern regarding the allegedly arbitrary suspension of the permits for a number of human rights organizations. We are concerned by the lack of warning given to the organizations prior to the suspension, and the lack of explanation or rationale cited for the decision to suspend their permits. Such information indicates that the decision to suspend their permits may have been arbitrary, and given the electoral context, that the decision was rather based on the perceived affiliation of these organizations with the political opposition. We are further concerned by the lack of relevant information provided to these organizations, the provision of which may have enabled them to make arrangements regarding their staff, funding, potential beneficiaries and planned activities. Such allegedly arbitrary suspensions and failure to provide those affected with practical information and explanation has a chilling effect on broader civil society and human rights defenders.

In connection with the above alleged facts and concerns, please refer to the **Annex on Reference to international human rights law** attached to this letter which cites international human rights instruments and standards relevant to these allegations.

As it is our responsibility, under the mandates provided to us by the Human Rights Council, to seek to clarify all cases brought to our attention, we would be grateful for your observations on the following matters:

1. Please provide any additional information and/or comment(s) you may have on the above-mentioned allegations.
2. Please provide information on the factual and legal basis for the suspension of the permits of the National Coalition of Human Rights Defenders Uganda, Chapter Four Uganda, Alliance for Finance Monitoring (ACFIM) and the Center for Constitutional Governance (CCG), and the findings or outcome of any investigations conducted following the permit suspension of these organizations. Please explain whether and how can these suspensions be compatible with Uganda's

obligations under international human rights law, including articles 19 and 22 ICCPR.

3. Please provide information on the measures taken by your Excellency's Government to ensure that human rights defenders and civil society organisations are able to carry out their peaceful and legitimate work and exercise their rights to freedom of association and freedom of expression in a safe and enabling environment without fear of threats or acts of intimidation and harassment of any kind.

This communication, and any response received from your Excellency's Government, will be made public via the communications reporting [website](#) at the 60 days mark. Should Your Excellency's Government respond within 60 days, both the communication and the response, may be published before the 60 days mark. The communications and responses will also be made available in the subsequent periodic report to be presented to the Human Rights Council.

While awaiting a reply, we urge that all necessary interim measures be taken to halt the alleged violations and prevent their re-occurrence and in the event that the investigations support or suggest the allegations to be correct, to ensure the accountability of any person(s) responsible for the alleged violations.

We may publicly express our concerns in the near future as, in our view, the information upon which the press release will be based is sufficiently reliable to indicate a matter warranting immediate attention. We also believe that the wider public should be alerted to the potential implications of the above-mentioned allegations. The press release will indicate that we have been in contact with your Excellency's Government's to clarify the issue/s in question.

Please accept, Excellency, the assurances of our highest consideration.

Mary Lawlor
Special Rapporteur on the situation of human rights defenders

Irene Khan
Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression

Gina Romero
Special Rapporteur on the rights to freedom of peaceful assembly and of association

Annex

Reference to international human rights law

In connection with above alleged facts and concerns, we would like to remind your Excellency's government of its obligations under the International Covenant on Civil and Political Rights (ICCPR), ratified by Uganda on 21 June 1995.

Article 22 of the ICCPR guarantees the right to freedom of association and notes that restrictions on this right must be prescribed by law and necessary in a democratic society in the interests of national security or public safety, public order, the protection of public health or morals or the protection of the rights and freedoms of others. As stated in the Covenant, "Everyone shall have the right to freedom of association with others, including the right to form and join trade unions for the protection of his interests" (ICCPR, art. 22 (1)).

States not only have a negative obligation to abstain from unduly interfering with the rights of peaceful assembly and of association but also have a positive obligation to facilitate and protect these rights in accordance with international human rights standards (A/HRC/17/27, para. 66; and A/HRC/29/25/Add.1). This means ensuring that the rights to freedom of peaceful assembly and of association are enjoyed by everyone, without discrimination on the basis of race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth or other status (A/HRC/41/41, para. 13).

As highlighted by the UN Special Rapporteur on freedom of assembly and association in her report to the Human Rights Council, "*Impact of the 2023–2025 'super election' cycle on the rights to freedom of peaceful assembly and of association*" (A/HRC/59/44), "Restrictions should not be used to suppress dissent or undermine political participation. Given the importance of the rights to freedom of peaceful assembly and of association in the context of elections, the threshold for imposing legitimate restrictions should be higher than usual: 'the criteria of 'necessity in a democratic society' and 'proportionality' should be more difficult to meet'. Independent judicial remedies must be available for violations of these rights as an essential part of the guarantee of free and fair elections." (A/HRC/59/44, §12)

In this sense, we would like to also refer to the former Special Rapporteur on the rights to freedom of peaceful assembly and of association, who indicated that "[t]he suspension and the involuntarily dissolution of an association are the severest types of restrictions on freedom of association. As a result, it should only be possible when there is a clear and imminent danger resulting in a flagrant violation of national law, in compliance with international human rights law. It should be strictly proportional to the legitimate aim pursued and used only when softer measures would be insufficient" (A/HRC/20/27, para. 75).

Furthermore, the former Special Rapporteur has also stated that where a registration license has been rejected, the organization "should have the opportunity to challenge the decision before an independent and impartial court" (A/HRC/20/27, para. 61). The former Special Rapporteur has also highlighted that access to information is crucial, indeed "public authorities must provide accessible information

for all regarding the legal framework governing the rights to freedom of peaceful assembly and of association and ensure public awareness about the law and relevant regulations [...]. That information should include any procedures to be followed by those wishing to exercise the right, who the responsible authorities are, the rules applicable to those officials and the remedies available for alleged violations of rights (CCPR/C/GC/37, para. 28)” (A/HRC/47/24, para. 35)

In the context of elections, the former Special Rapporteur has furthermore held that “[t]he right to freedom of peaceful assembly and of association are pertinent to the democratic process, both during the election period and between elections. The Special Rapporteur reiterates that these rights are essential components of democracy since they empower women, men and youth to “express their political opinions, engage in literary and artistic pursuits and other cultural, economic and social activities, engage in religious observances or other beliefs, form and join trade unions and cooperatives, and elect leaders to represent their interests and hold them accountable” (Council resolution 15/21, preamble)” (A/68/299, para. 5).

The Special Rapporteur went on to state that “[i]n its resolution 15/21, the Human Rights Council calls upon States to respect and fully protect the rights of all individuals to assemble peacefully and associate freely, including in the context of elections. In addition to the notion of democracy, the rights to freedom of peaceful assembly and of association are implicit in the right to take part in the Government of one’s country, as affirmed in the Universal Declaration of Human Rights, which states in article 21 (3) that “[t]he will of the people shall be the basis of the authority of government; this will shall be expressed in periodic and genuine elections which shall be by universal and equal suffrage and shall be held by secret vote or by equivalent free voting procedures”.

Similarly, article 25 of the International Covenant on Civil and Political Rights affirms every citizen’s right without prohibited distinctions and unreasonable restrictions: (a) to take part in the conduct of public affairs, directly or through freely chosen representatives; (b) to vote and to be elected at genuine periodic elections which shall be by universal and equal suffrage and shall be held by secret ballot, guaranteeing the free expression of the will of the electors; and (c) to have access, on general terms of equality, to public service in his country (see also article 7 of the Convention on the Elimination of Discrimination against Women; article 29 of the Convention on the Rights of Persons with Disabilities; article 23 (1) (b) of the American Convention on Human Rights; article 13 of the African Charter on Human and Peoples’ Rights; article 33 of the Arab Charter on Human Rights; and para. 25 of the Human Rights Declaration of the Association of Southeast Asian Nations).

The Human Rights Committee recognizes that the full enjoyment of those rights depends on the free communication of information and ideas about public and political issues between citizens, candidates and elected representatives, which requires the free exercise of the rights to peaceful assembly and association, among other rights (general comment No. 25, para. 25). The General Assembly, in its resolution 59/201 declared that freedom of association and peaceful assembly were essential elements of democracy, together with the right to vote and to be elected at genuine periodic free elections, and encouraged the strengthening of political party systems and civil society organizations” (A/68/299, para. 12).

Article 19 of the ICCPR guarantees the right to hold opinions without interference and the right to freedom of expression, which includes the right “to seek, receive and impart information and ideas of all kinds, either orally, in writing or in print, in the form of art, or through any other media”. This right applies online as well as offline, protects the freedom of the press as one of its core elements and includes not only the exchange of information that is favourable, but also that which may criticize, shock, or offend.

In its [general comment No. 34](#), the Human Rights Committee stated that States parties to the ICCPR are required to guarantee the right to freedom of expression, including “political discourse, commentary on one's own and on public affairs, canvassing, discussion of human rights, journalism, cultural and artistic expression, teaching, and religious discourse” (CCPR/C/GC/34, para. 11). The Committee states that article 19 also covers the right of a free press and other media able to comment on public issues without censorship or restraint and to inform public opinion and a corresponding right of the public to receive media output.

The Committee further asserts that there is a duty of States to put in place effective measures to protect against attacks aimed at silencing those exercising their right to freedom of expression (para. 23). Recognizing how journalists and persons who engage in the gathering and analysis of information on the human rights situation and who publish human rights-related reports, including judges and lawyers, are frequently subjected to threats, intimidation and attacks because of their activities, the Committee stresses that “all such attacks should be vigorously investigated in a timely fashion, and the perpetrators prosecuted, and the victims, or, in the case of killings, their representatives, be in receipt of appropriate forms of redress” (para. 23).

Any restriction on the right to freedom of expression must be compatible with the requirements set out in article 19(3) ICCPR. Under these requirements, restrictions must (i) be provided by law; (ii) pursue one of the legitimate aims for restriction, which are the respect of the rights or reputations of others and the protection of national security or of public order (*ordre public*), or of public health or morals; and (iii) be necessary and proportionate for those objectives. The State has the burden of proof to demonstrate that any such restrictions are compatible with the Covenant, and restrictions must always be “the least intrusive instrument among those which might achieve their protective function” ([CCPR/C/GC/34, para. 34](#)).

Article 19(3) may never be invoked to justify the muzzling of any advocacy of democratic tenets and human rights (para. 23). Nor, under any circumstance, can an attack on a person, because of the exercise of their freedom of opinion or expression, including such forms of attack as arbitrary arrest and torture, be compatible with article 19 (para. 23). The Human Rights Committee also explicitly noted that the penalization of a media outlet or journalist solely for being critical of the government or the political social system espoused by the government can never be considered to be a necessary restriction of freedom of expression (para. 42).

Furthermore, we would like to refer your Excellency's Government to the fundamental principles set forth in the Declaration on the Right and Responsibility of Individuals, Groups and Organs of Society to Promote and Protect Universally

Recognized Human Rights and Fundamental Freedoms, adopted on 9 December 1998 (also known as the UN Declaration on Human Rights Defenders). Articles 1 and 2 of the Declaration state that everyone has the right to promote and to strive for the protection and realization of human rights and fundamental freedoms at the national and international levels and that each State has a prime responsibility and duty to protect, promote and implement all human rights and fundamental freedoms.

Likewise, we would like to bring to the attention of your Excellency's Government the following provisions of the UN Declaration on Human Rights Defenders:

- Article 5 (b), which states that everyone has the right, individually or in association with others, to form, join and participate in non-governmental organizations, associations or groups;
- Article 6 (b) and (c), which provides for the right to freely publish, impart or disseminate to others views, information and knowledge on all human rights and fundamental freedoms; and to study, discuss, form and hold opinions on the observance, both in law and in practice, of all human rights and fundamental freedoms and to draw public attention to those matters;
- Article 9 (1), which establishes that in the exercise of human rights and fundamental freedoms, including the promotion and protection of human rights, everyone has the right to benefit from an effective remedy and to be protected in the event of the violation of those rights; and
- Article 12 (2) and (3), which provides that the State shall take all necessary measures to ensure the protection of everyone against any violence, threats, retaliation, de facto or de jure adverse discrimination, pressure, or any other arbitrary action as a consequence of their legitimate exercise of the rights referred to in the Declaration. In this connection, everyone is entitled, individually and in association with others, to be protected effectively under national law in reacting against or opposing, through peaceful means, activities, and acts, including those by omission, attributable to States that result in violations of human rights and fundamental freedoms, and acts of violence perpetrated by groups or individuals that affect the enjoyment of human rights and fundamental freedoms.