

# The Status of Women's Rights Online

## The Assessment of the Legal and Regulatory Frameworks Governing Freedom of Expression and Access to Information in Uganda

Research Report, June 2021



WOMEN OF UGANDA NETWORK

ICNL

# Acknowledgement

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The Women of Uganda Network (WOUGNET) wishes to thank the research team for the meticulous efforts in putting this research together. WOUGNET also thanks the research respondents – the key informants and those who participated in the focus group discussions in Gulu, Kampala, and Nakaseke for their time and responses.

Lastly, WOUNGET would like to thank the International Centre for Not-for-Profit-Law for the financial and technical support in putting together this report.

**Authors:** Peace Oliver Amuge, Sandra Aceng, Isaac Amuku.



# TABLE OF CONTENTS

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Acknowledgement	3
List of Abbreviations and Acronyms	5
INTRODUCTION	6
BACKGROUND TO THE STUDY	8
RESEARCH METHODOLOGY	9
THE FINDINGS OF THE STUDY	11
Legal Framework on Internet Rights, Freedom of Expression and Access to Information	11
International Legal and Regulatory Framework governing Freedom of Expression and Access to Information in Uganda	11
National Legal and Regulatory Framework Governing Freedom of Expression and Access to Information in Uganda	12
Limitations to Rights to Freedom of Expression and Access to Information	14
Other Laws and Policies that affect Women's Online Rights	15
Challenges to Women's Freedom of Expression and Access to Information Online	17
Retrogressive Legal and Policy Provisions	17
Lack of Access to and Affordability of ICT by Women	18
Increased cases of Online Gender Based Violence, including Cyberbullying and Stalking	19
Lack of Knowledge, Skills, and Tools to Safely Navigate the Internet	20
Opportunities to Enhance Women's Status Online	21
Recommendations	21
Annex 1: Key Informant Interview Guide	25
Annex 2: Focused Group Discussion Interview Guide	26

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## List of Abbreviations and Acronyms

<b>ACHPR</b>	African Charter on Civil and Political Rights
<b>ICCPR</b>	International Convention on Civil and Political Rights
<b>ICNL</b>	International Centre for Not-for-Profit Law
<b>ICT</b>	Information and Communication Technologies
<b>MTN</b>	Mobile Telecommunications Network
<b>NITA-U</b>	National Information and Technology Authority – Uganda
<b>RCDF</b>	Rural Communications Development Fund
<b>RICA</b>	Regulation of Interception of Communications Act
<b>UCC</b>	Uganda Communications Commission
<b>UDHR</b>	Universal Declaration of Human Rights
<b>UN</b>	United Nations
<b>WOUGNET</b>	Women of Uganda Network

# INTRODUCTION

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The Internet and other digital technologies such as social media have been considered the most disruptive information and communication technologies (ICT) that has transformed the free flow of information by offering anyone with an Internet connection, the ability to gather and disseminate news, information, and opinions.<sup>1</sup>

At the end of September 2020, total internet subscriptions had for the first time in industry history crossed the 20 million mark. This translates into an internet connection for 1 in every 2 Ugandans.<sup>2</sup>

Despite the increase in access to and use of the internet and ICTs across the board, access and affordability is still a challenge for large sections of the population especially the poor, rural populations, women, and persons with disabilities.

According to a 2015 Uganda Communications Commission (UCC) survey on Access and Usage of ICTs, only 44% of women owned and could use a phone at any time compared to 62% of the men. Additionally, only 15% of women had used a computer or the internet in the last three months prior to the survey compared to 21% of the men that were interviewed.<sup>3</sup>

According to a 2018 National Information and Technology-Uganda (NITA-U) study on ICT, there is a location bias with more urban individuals owning mobile phones compared to rural counterparts (78.5% vs 65.7% respectively) and a gender bias with more males owning mobile phones compared to females (81.6% vs. 63.2%).<sup>4</sup>

The gender gap in internet access is perpetuated by several factors including limited access to the internet, lack of digital skills and empowerment of women, lack of affordability of ICT services especially broadband connectivity, relevant content as well as safety of women online.<sup>5</sup>

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<sup>1</sup> ARTICLE 18, Digital Rights <https://www.article19.org/issue/digital-rights/> accessed on December 5th 2019

<sup>2</sup> UCC Market Performance Report 3Q20 <https://www.ucc.co.ug/wp-content/uploads/2021/01/MARKET-PERFORMANCE-REPORT-Q3-2020-Final-compressed.pdf>

<sup>3</sup> UCC (2015) Access and Usage of ICT across Uganda <https://www.ucc.co.ug/files/downloads/20150130-UCC-access-usage-dissemination.pdf>

<sup>4</sup> NITA-U (2018) National Information and Technology Survey 2017/2018 <https://www.nita.go.ug/sites/default/files/publications/National%20IT%20Survey%20April%2010th.pdf>

<sup>5</sup> Ibid

According to the 2020 report from the UCC, the cost of acquiring 1 gigabyte of the internet in Uganda stands at \$2.67(Shs9819). Compared to Kenya, Tanzania, and Rwanda at \$2.41(Shs8863), \$2.18(Shs8017) and \$2.18(Shs8017) respectively, Uganda's is the highest.<sup>6</sup>

However, beyond having access to and affording the costs of the internet, utilization of these digital technologies requires the right skills, knowledge, and tools. Unfortunately, majority of women also lack the skills and confidence to engage with digital technologies effectively at every level, starting from basic usage. In Uganda, there are high illiteracy levels among women, which impedes their access to and use of digital technologies.

The 2014 shows that literacy levels among females was lower at, 68% compared to that of males, which stood at 77%.<sup>7</sup>

If the digital gender gap is not addressed, digital technologies may exacerbate gender inequalities rather than help to reduce them, and girls and women will not be able to equally participate in the more increasing digital spaces.<sup>8</sup>

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<sup>6</sup> Daily Monitor (Feb 4, 2020) *Why Uganda's Internet cost is highest in East Africa*; <https://www.monitor.co.ug/Business/Prosper/Why-Uganda-Internet-cost-highest-East-Africa/688616-5442208-xb08c2z/index.html#:~:text=In%20Summary&text=A%20recent%20study%20by%20telecom,respectively%2C%20Uganda's%20is%20the%20highest>.

<sup>7</sup> Ibid

<sup>8</sup> Reiko Kuroda (W20), Mariana Lopez (GSMA), et al., *Digital Equity Policy Brief W20 Japan*

# BACKGROUND TO THE STUDY

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In 2021, the Women of Uganda Network (WOUGNET) with support from the International Centre for Not-For-Profit-Law (ICNL) implemented a project, Strengthening Ugandans' Rights to Freedom of Expression through Policy Advocacy and Media (SURFACE).

As part of the project, the Women of Uganda Network (WOUGNET) conducted an assessment on the status of Women's Rights Online based on regulatory and legal frameworks that govern right to access information and freedom of expression online and other social media platforms; and also developed the Women's Rights Online education guide/handbook and policy brief.

In this report, WOUGNET provides an assessment of the regulatory and legal frameworks that govern right to access information and freedom of expression online and other social media platforms.

The assessment sought to among other things;

- Understand the distribution of access to and use of ICT, including social media, internet connectivity among women and men in Uganda (Rural, urban, and peri-urban).
- Analyse and review the existing laws that government/affect the rights to freedom of expression and access to information online.
- Analyse how the laws impact women's access to information and freedom of expression online (positive and negative).



# RESEARCH METHODOLOGY

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This study was a qualitative undertaking involving three basic data collection methodologies – comprehensive legal and policy analysis using a legal assessment tool, Focus Group Discussions (FGDs), and Key Informant Interviews (KII) with purposively selected respondents in Uganda.

In assessing Uganda's legal and regulatory framework governing freedom of expression and access to information, it was critical to review the country's performance in signing to and ratifying the relevant international human rights instruments, constitutional provisions as well as other laws and policies that affect the rights to freedom of expression and access to information online.

The research thus examined the relevance and applicability of these provisions, including the penalties and sanctions if they are clear, pursue a legitimate aim, necessary and proportionate.

In doing the assessment, the research was guided by a set of open-ended questions.

1. Is Uganda a signatory/party to the various international human rights instruments that provide for the rights to freedom of expression and access to information?
2. Are the rights of freedom of expression and access to information guaranteed in law and respected in practice?
3. Are there any legal limitations to the enjoyment of the right to freedom of expression and access to information online?
4. Do the laws provide for sanctions against an infringement on the rights to freedom of expression and access to information online?
5. Are the limitations and sanctions consistent with the African Declaration and with international human rights laws and standards concerning freedom of expression and access to information online?
6. Do the laws and policies provide redress mechanisms for those whose rights to Freedom of Expression (FoE) and Access to Information (ATI) have been violated?
7. Do the laws and policies make special provisions to enhance the enjoyment of the rights to freedom of expression and access to information online for women and other vulnerable groups?

To assess the impact of the laws and policies, the research also undertook Key informant interviews, which involved detailed discussions with key informants in Kampala, Gulu, and Nakaseke district.

An interview guide was prepared with questions drawn from engagements with the key informants, who were selected from the public sector, media, civil society, and academia. The purpose of using this approach was to collect information from a wide range of experts and individuals owing to their particular knowledge, understanding and engagement with digital rights and gender issues in Uganda.

The information generated from the key informants was useful in establishing the level of implementation of the relevant laws and how these affect women's participation online (access, use, and perceptions), especially how women exercise their rights to freedom of expression and access to information.

Besides the key informant interviews, the research also conducted 4 FGDs in the districts of Nakaseke and Gulu. Like with the key informant interviews, an interview guide was developed for conducting the FGDs. The purpose for the FGDs was to get insights from multiple sources at the same time, as well knowledge on peoples' divergent understanding of women's online rights issues, especially freedom of expression and access to information when discussed in a group setting.

Both guides for the key informants and FGDs were pre-tested with at least two representatives from each of the categories.

# THE FINDINGS OF THE STUDY

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## Legal Framework on Internet Rights, Freedom of Expression and Access to Information

*In this section, the research is answering the following research questions.*

***Is Uganda a signatory/party to the various international human rights instruments that provide for the rights to freedom of expression and access to information?***

### International Legal and Regulatory Framework Governing Freedom of Expression and Access to Information in Uganda

Uganda is a signatory and party to several international and regional human rights instruments which have expressly provided for the rights to freedom of expression and access to information (including on the internet and social media). For example, Article 19 of the Universal Declaration of Human Rights, states that; “Everyone has the right to freedom of opinion and expression; this right includes freedom to hold opinions without interference and to seek, receive and impart information and ideas **through any media and regardless of frontiers.**”<sup>9</sup>

These rights are further articulated within Article 19 (2) of the International Covenant on Civil and Political Rights (ICCPR), which states that; “Everyone shall have the right to freedom of expression; this right shall include freedom to seek, receive and impart information and ideas of all kinds, **regardless of frontiers**, either orally, in writing or in print, in the form of art, or **through any other media of his choice.**”<sup>10</sup>

In 2016, the United Nations passed a non-binding resolution on “the promotion, protection, and enjoyment of human rights on the Internet.”<sup>11</sup> The resolution recognizes the importance of access to information and privacy online for the realization of the right to freedom of expression and to hold opinions without interference.<sup>12</sup> And further condemns measures to prevent or disrupt access and calls on all States to refrain from and cease such measures.

At the African continental level, Article 9 (2) of the African Charter on Human and Peoples’ Rights (ACHPR) states that; “Every individual shall have the right to receive information” (9(1); and “Every individual shall have the right to express and disseminate his opinion **within the law.**”<sup>13</sup>

The African Commission has also adopted several resolutions aimed at promoting right to information and freedom of expression in Africa amongst which include; ACHPR/Res. 362 (LIX) 2016, adopted in Banjul on 4 November 2016.<sup>14</sup> The resolution reaffirms the fundamental right to freedom of information and expression enshrined under Article 9 of the African Charter on Human and People’s Rights and in other international human rights instruments, and recognizes the role of the internet in advancing human and people’s rights in Africa.

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<sup>9</sup> General Comment no. 34 on Article 19 of the ICCPR

<sup>10</sup> <https://treaties.un.org/doc/publication/unts/volume%20999/volume-999-i-14668-english.pdf> accessed on 18 Feb 2021

<sup>11</sup> [https://www.article19.org/data/files/Internet\\_Statement\\_Adopted.pdf](https://www.article19.org/data/files/Internet_Statement_Adopted.pdf) accessed on 19 Feb 2021

<sup>12</sup> <https://www.osce.org/fom/250656> accessed on 19 Feb 2021

<sup>13</sup> <https://treaties.un.org/doc/Publication/UNTS/Volume%201520/volume-1520-I-26363-English.pdf> accessed on 17 Feb 2021

<sup>14</sup> <https://www.achpr.org/sessions/resolutions?id=374> Accessed on 19 Feb 2021

Article 18 (2b) of the Protocol of the African Charter on Human and Peoples' Rights on the Rights of Women in Africa<sup>15</sup> requires States Parties to take all appropriate measures to promote research and investment in new and renewable energy sources and appropriate technologies, including **information technologies** and facilitate women's access to, and participation in their control;

And although there is no express mention of the right of access to the internet under any of the international law, the 2016 United Nations Resolution urges states to “consider formulating, through transparent and inclusive processes with all stakeholders, and adopting national Internet-related public policies that have the objective of universal access and enjoyment of human rights at their core.”<sup>16</sup>

As a signatory and party to various international human rights instruments such as the ICCPR, the ACHPR, Uganda has an obligation to promote and advance peoples’ fundamental human rights online, including access to and use of the internet through progressive legislation and practices.

## **The National Legal and Regulatory Framework Governing Freedom of Expression and Access to Information in Uganda**

*Are the rights of freedom of expression and access to information guaranteed in law and respected in practice?*

Uganda has passed several laws and policies, some of which contain progressive provisions that advance the digital rights, including the rights to freedom of expression, access to information, and privacy. However, majority of the laws and policies in Uganda lack special protection to women’s rights online including on the internet and social media. This comes even when Uganda in 2019 was mentioned as one of the African countries leading in having the most favorable laws for ICT and Innovation. Some of the laws mentioned to have placed Uganda ahead of other African countries include Electronic Transaction Act 2011, Electronic Signatures Act 2011, Computer Misuse Act 2011, Data Protection and Privacy Act 2019, Interception of Communications Act 2010, Uganda Communications Act 2013, and among others. However, after a close analysis of these laws, and beyond, they lack specific provision and special protection of women’s rights online.

### **The 1995 Uganda Constitution (as amended)**

Article 29(1)(a) states that; “Every person shall have the right to freedom of speech and expression, which shall include freedom of the press and **other media**,” The **other media** here can be interpreted to include online based media.

While Article 27 provides for the right to privacy, stating that; (1) No person shall be subjected to- (a) unlawful search of the person, home or other property of that person; (b) unlawful entry by others of the premises of that person property. (2) No person shall be subjected to interference with the privacy of that person's home, correspondence, communication or other property.

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<sup>15</sup> The Protocol for the African Charter on Human and Peoples' Rights [https://www.un.org/en/africa/osa/pdf/au/protocol\\_rights\\_women\\_africa\\_2003.pdf](https://www.un.org/en/africa/osa/pdf/au/protocol_rights_women_africa_2003.pdf)

<sup>16</sup> [https://www.article19.org/data/files/Internet\\_Statement\\_Adopted.pdf](https://www.article19.org/data/files/Internet_Statement_Adopted.pdf) accessed on 19 Feb 2021

On the other hand, Article 41, on the right of access to information states that:

(1) Every citizen has a right of access to information in the possession of the State or any other organ or agency of the State except where the release of the information is likely to prejudice the security or sovereignty of the State or interfere with the right to the privacy of any other person.

(2) Parliament shall make laws prescribing the classes of information referred to in clause (1) of this article and the procedure for obtaining access to that information.

Indeed, in 2005, **Parliament passed the Access to Information Act**, that seeks to promote an efficient, effective, transparent, and accountable government as well as to give effect to Article 41(2) of the Constitution.

According to section 5(1) of the Access to Information Act, 2005; “Every citizen has a right of access to information and records in the possession of the State or any public body, except where the release of the information is likely to prejudice the security or sovereignty of the State or interfere with the right to the privacy of any other person. While section 5(2) states that; “For the avoidance of doubt, information and records to which a person is entitled to have access under this Act shall be accurate and up-to-date so far as is practicable.”

In fulfilment of section 47 of the Act, which required the Minister to make, by statutory instruments, regulations prescribing the fees of access, forms to be used when requesting for information, duration of responding to the request, among others, the **Access to Information Regulations**<sup>17</sup> were eventually in 2011, six years later. Unfortunately, both the Access to Information Law and its accompanying regulations pose great challenges.

Specifically, the regulations introduce several restrictions such as access fees (regulation 7) of twenty thousand shillings (equivalent to USD 8) and reproduction costs of the information requested for, which is a bit high for most of the population.

The Act also contains several exemptions to the right of access to information including Cabinet records and those of its committees (section 25), information relating to privacy of another person (section 26), commercial information of a third party (section 27), among others.

The Constitution also provides for the rights of women under Article 33(1) noting that Women shall be accorded full and equal dignity of the person with men; while Article 33(2) requires the State to provide the facilities and opportunities necessary to enhance the welfare of women to enable them to realise their full potential and advancement. Article 33(3) obliges the State to protect women and their rights, considering their unique status and natural maternal functions in society.

As one of her strategies to promote gender equality, the government committed to “Developing and promoting labour and time saving technologies for the poor women and men;”<sup>18</sup> In its analysis, the government noted that gender discrimination has been fueled by low levels of education and limited access to information. Thus, the need to embark on extensive legal literacy in order to change gender discriminatory values and create an enabling environment for all women and men to know, demand and enjoy their rights,<sup>19</sup> including online related rights.

<sup>17</sup> Access to Information Regulations, 2011, <https://ulii.org/ug/legislation/statutory-instrument/2011/17>

<sup>18</sup> Gender Policy 2007, section 5.0

<sup>19</sup> Ibid

## Limitations to Rights to Freedom of Expression and Access to Information

*Are there any legal limitations to the enjoyment of the right to freedom of expression and access to information online?*

*Are the limitations and sanctions consistent with the African Declaration and with international human rights laws and standards concerning freedom of expression and access to information online?*

The rights to freedom of expression and access to information are subject to limitations as provided for by both the ICCPE and the ACHPR. Article 19 (3) of the ICCPR notes that; the exercise of the rights provided for in paragraph 2 of this Article carries with its special duties and responsibilities. It may, therefore, be subject to certain restrictions, but these shall only be such as are provided by law and are necessary: (a) For respect of the rights or reputations of others; (b) For the protection of national security or of public order (order public), or of public health or morals.<sup>20</sup>

On 21 July 2011, the UN Human Rights Committee adopted General Comment 34 on States parties' obligations under Article 19 of the (ICCPR), with guidance to States on what the freedoms of opinion and expression mean in practice, and therefore strengthens the protection provided by international law. In reference to any restrictions.

General Comment 34 (para 35) highlights that “When a State party invokes a legitimate ground for restriction of freedom of expression, it must demonstrate in specific and individualized fashion the precise nature of the threat, and the necessity and proportionality of the specific action taken, in particular by establishing a direct and immediate connection between the expression and the threat.”<sup>21</sup>

On the other hand, the African Declaration on Internet Rights and Freedoms notes that “Content blocking, filtering, removal and other technical or legal limits on access to content constitute serious restrictions on freedom of expression and can only be justified if they strictly comply with international human rights law, which says that any restrictions should be; (a) Prescribed by law; (b) Serve a legitimate purpose for the protection of reputation, national security, public order, public health or morals; and, (c) It must be necessary to achieve the prescribed purpose.

In Uganda, Article 43(1) of the Constitution provides limitations to the enjoyment of the rights to freedom of expression and access to information noting that; (1) In the enjoyment of the rights and freedoms prescribed in this Chapter, no person shall prejudice the fundamental or other human rights and freedoms of others or the public interest.

The Access to Information Act, together with the accompanying regulations contain several exemptions/limitations to peoples' (both men and women) enjoyment of their right of access to information. For example, Cabinet records and those of its committees are excluded from information that can be requested and applied for by Ugandans, (section 25), information relating to privacy of another person (section 26), commercial information of a third party (section 27), among others.

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<sup>20</sup> ICCPR <https://treaties.un.org/doc/publication/unts/volume%20999/volume-999-i-14668-english.pdf> accessed on 20th December 2019

<sup>21</sup> General Comment No. 34 on Article 19 of the ICCPR, Accessed on 13th January 2020 @ <https://bangkok.ohchr.org/programme/documents/general-comment-34.aspx>

## Other Laws and Policies that affect Women's Online Rights.

*Do the laws and policies provide redress mechanisms for those whose rights to Freedom of Expression and Access to Information have been violated?*

*Do the laws and policies make special provisions to enhance the enjoyment of the rights to freedom of expression and access to information online for women and other vulnerable groups?*

In 2019, Uganda passed the **Data Protection and Privacy Act, 2019** that provides for the protection of privacy of the individual and of personal data by regulating the collection and processing of personal information. It also provides for the legal rights of persons whose data is collected and the obligations of data collectors, data processors and data controllers, as well as regulating the use or disclosure of personal information.<sup>22</sup>

The Data Protection and Privacy Act, 2019, provides data subjects, both men and women with legal rights to protect their online identity and to manage or correct information concerning them. Specifically, sections 10; protection of privacy; section 9(1); prohibits the collection and processing of personal data that relates to the religious or philosophical beliefs, political opinion, sexual life, financial information, health status or medical records of an individual; and section 7, which prohibits the collection and processing of personal data without the prior consent of the data subject. Additionally, section 16 empowers the data subject to request a data controller to correct, delete or destroy personal data held by or under the control of the data controller that is inaccurate, irrelevant, excessive, out of date or incomplete, misleading, or obtained unlawfully.

The **Computer Misuse Act, 2011**<sup>23</sup> that seeks to make provision for the safety and security of electronic transactions and information systems; to prevent unlawful access, abuse, or misuse of information systems.<sup>24</sup>

The Act's definition of a computer covers all types of electronic or electromagnetic systems capable of storing or transmitting data.

Section 25 of the Act defines and criminalizes offensive communication stating that; "any person who willfully and repeatedly uses electronic communication to disturb or attempts to disturb the peace, quiet or right of privacy of any person with no purpose of legitimate communication whether or not a conversation ensues commits a misdemeanor and is liable on conviction to a fine not exceeding Uganda Shillings 480,000 (about USD 140) or imprisonment not exceeding one year or both"

The **Uganda Communications Commission (UCC) Act, 2013**<sup>25</sup> which under Section 5(L) seeks to promote research into the development and use of new communications techniques and technologies, including those which promote accessibility to communications services for persons with disabilities.

<sup>22</sup> Uganda Data Protection and Privacy Act, 2019 <https://ict.go.ug/wp-content/uploads/2019/03/Data-Protection-and-Privacy-Act-2019.pdf>

<sup>23</sup> Computer Misuse Act, 2011 <https://ulii.org/ug/legislation/act/2015/2-6> Accessed 19 Feb 2021

<sup>24</sup> Ibid

<sup>25</sup> UCC Act, 2013 <https://www.ug-cert.ug/files/downloads/UCC%20Act%202013.pdf> Accessed 19 Feb 2021



The **Regulation of Interception of Communications Act, 2010**<sup>26</sup> provides for lawful interception and monitoring of communications in the course of their transmission through a telecommunication, postal or any other related service or system. Section 3 provides for the establishment of a monitoring centre under the oversight of a minister. Section 9 (2) of the Regulations of Interception of Communications Act, 2010 requires telecommunication service providers to ensure that existing subscribers register their SIM-cards within the period of six months from the date of commencement of the Act. The Act makes it a crime to unlawfully intercept communication of a person and lawful interception is only permitted by authorised officials upon issue of a warrant by a judge.

However, section 8 of this RICA requires service providers to ensure that their telecommunication systems are always technically capable of supporting lawful interception of communication. This provision greatly undermines the ability and desire of the online community to have secure and private communication.

The right to privacy is further limited by the **Anti-Terrorism Act, 2002**,<sup>27</sup> which provides for interception of communications, specifically, section 19 (1) which states that “... an authorized officer shall have the right to intercept the communications of a person and otherwise conduct surveillance of a person under this Act.”

Additionally, the **Anti-Pornography Act, 2014** which prohibits the publication and circulation of pornographic content makes it an offence under section 13, to publish, broadcast, traffic in, procure, import, or export pornography. The law is mostly unfavourable to women as section 13 is likely to discourage victims of nonconsensual intimate imagery commonly referred to as “revenge pornography” from reporting cases to authorities in fear of retribution as the victim and perpetrator are equally liable.<sup>28</sup> Moreover, section 17 requires Internet Service Providers (ISPs) not to allow their protocols and systems to be used for publishing pornography. It places an obligation on ISPs to monitor and carry out surveillance on their subscribers for them to be able to identify and remove content considered pornographic.<sup>29</sup>

While section 13(1) of the Anti-Pornography Act<sup>30</sup> criminalizes the production, trafficking in, publication, broadcasting, procuring, importing, exporting, selling, or abetting any form of pornography, only in one case, (that of Martha Kay) have other individuals (outside the victim) been charged for cybercrime related to the leaking of the nude pictures and videos. In August 2019, two individuals, Herbert Arinaitwe alias John Paul, 27, a businessman in Rubaga division and Farid Mukiibi, 34, were charged at Buganda Road Chief Magistrate’s Court by Chief Magistrate Ms. Miriam Okello with aggravated robbery and cyber-crime in connection to leaking nude photos of socialite Martha Kagimba, aka Martha.<sup>31</sup>

The impact of these cyberbullying and harassment is further compounded by the fact that authorities are always on hand to arrest and or seek to prosecute the victims. In 2019, one of the victims, Judith Heard told the BBC how she was arrested and shamed for the leaked nudes.<sup>32</sup> According to human rights activists and academic, Prof. Sylvia Tamale, the acts of leaking nudes and sex tapes of women are part of pervasive levels of violence against women.<sup>33</sup>

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<sup>26</sup> RICA, 2010 <https://ulii.org/ug/legislation/act/2015/18> Accessed 02 Feb 2021

<sup>27</sup> Anti-Terrorism Act, 2002, <https://www.fia.go.ug/sites/default/files/2020-06/Anti-Terrorism%20Act%2C%202002.pdf>

<sup>28</sup> Ibid

<sup>29</sup> Ibid

<sup>30</sup> The Anti-Pornography Act <https://ulii.org/system/files/legislation/act/2014/1/Anti%20Pornography%20Act%20of%202014.pdf>

<sup>31</sup> PMDaily (2019) Two charged over leaking Martha Kay’s nudes <https://www.pmdaily.com/news/2019/08/two-charged-over-leaking-martha-kays-nudes.html>

<sup>32</sup> BBC (2019) ‘I was arrested and shamed for leaked nudes’: Ugandan model Judith Heard, <https://www.bbc.com/news/av/world-africa-47612896/i-was-arrested-and-shamed-for-leaked-nudes-ugandan-model-judith-heard>

<sup>33</sup> Daily Monitor (2015) Sex tapes are part of pervasive levels of violence against women <https://www.monitor.co.ug/OpEd/Commentary/Sex-tapes-are-part-of-pervasive-levels-of-violence-against-women/689364-2618598-13vi71d/index.html>



## Challenges to Women's Freedom of Expression and Access to Information Online

### Retrogressive Legal and Policy Provisions

Despite the 1995 Constitutional (as amended) guarantees on the rights to freedom of expression (Article 29), access to information (Article 41) and privacy (Article 27), and Uganda being a signatory or party to several international and regional human rights instruments on providing for the same rights, the country has over the years enacted several laws and policies with provisions that have served to curtail the enjoyment of these rights.

As discussed above, several laws do not promote a conducive environment for women to enjoy their rights online. They provide for surveillance, and lawful interception and monitoring of communications during their transmission through telecommunications, postal or any other related services or systems in Uganda.

For example, the Anti-Terrorism Act, 2002, Interception of Communications Act, 2010, and Anti-Pornography Act, 2014 all grant powers to the state and in instances to private entities to carry out surveillance to counter terrorism, monitor security or monitor publication of pornographic content or content deemed immoral.<sup>34</sup>

Although the government enacted the 2011 Computer Misuse Act<sup>35</sup> to criminalize cyber harassment (section 24), offensive communication (section 25) and cyber stalking (section 26), it has not been used to protect women, who are the biggest victim of these crimes. In 2018, a then 25-year-old man, Isiko Brian, was charged and convicted of cybercrime and offensive communication for sending unsolicited text messages to women member of parliament, Sylvia Rwabwogo. He was sentenced to jail for two years.<sup>36</sup> The case however generated a lot of debate, with many commenters, including media reporting that Mr. Isiko was being charged for expressing love to the MP.<sup>37</sup> Others praised the sentencing noting that it will send a precedent that stalking is not love.<sup>38</sup>

The impact of these cyberbullying and harassment is further compounded by the fact that authorities are always on hand to arrest and or seek to prosecute the victims. In 2019, one of the victims, Judith Heard told the BBC how she was arrested and shamed for the leaked nudes.<sup>39</sup>

<sup>34</sup> State of Internet Freedom in Uganda 2014 [http://cipesa.org/?wpfb\\_dl=235](http://cipesa.org/?wpfb_dl=235)

<sup>35</sup> Uganda Computer Misuse Act 2011 <https://ulii.org/ug/legislation/act/2015/2-6>

<sup>36</sup> A 25-year-old Brian Isiko To Serve 2 Years In Prison For Sweet-Talking An MP <https://newslexpoint.com/brian-isiko-serve-prison-sweet/>

<sup>37</sup> Brian Isiko charged afresh over sending love messages to MP [https://www.newvision.co.ug/new\\_vision/news/1487052/brian-isiko-charged-afresh-sending-love-messages-mp](https://www.newvision.co.ug/new_vision/news/1487052/brian-isiko-charged-afresh-sending-love-messages-mp)

<sup>38</sup> Stalking women is not love <https://www.dandc.eu/en/article/court-sentence-uganda-shows-cyber-harassment-and-stalking-women-not-be-confused-love>

<sup>39</sup> BBC (2019) 'I was arrested and shamed for leaked nudes': Ugandan model Judith Heard,

<https://www.bbc.com/news/av/world-africa-47612896/i-was-arrested-and-shamed-for-leaked-nudes-ugandan-model-judith-heard>

## Lack of Access to and Affordability of ICT by Women

Another challenge that hinders women's right to freedom of expression and access to information online is the lack of access to and affordability of ICT. This is because while internet access has become more affordable, particularly on mobile phones, costs are still expensive for many Ugandans, especially the women who have no significant sources of income.<sup>40</sup> According to a 2015 Uganda Communications Commission survey on Access and Usage of ICTs, only 44% of women owned and could use a phone at any time compared to 62% of the men. Additionally, only 15% of women had used a computer or the internet in the last three months prior to the survey compared to 21% of the men that were interviewed.<sup>41</sup>

This shows the existence of gender digital divide in terms of access and cost for instance Uganda men still remain 43% more likely to be online than women according to 2020 Web Foundation Report on Women's Rights Online.<sup>42</sup>

Figures from the 2014 Uganda National Population and Housing Survey indicate that 32% of women were not involved in any economic activities, compared to only 26% of the men.<sup>43</sup>

However, beyond the costs, some women, especially in the rural areas are restricted by their husbands from accessing ICT, especially phones.



*"Restrictions from their husbands as a way of keeping them ignorant. Other men also do this because they think that their wives are in affairs with other men on the internet,"*  
female police officer from Nakaseke

*"Accessing information is very expensive like buying, gadgets, data and OTT is very expensive for an ordinarily woman. Government policies are not friendly for example during elections there was internet shut down, also government follows up if you post about it loopholes, that actually scares away people,"*  
male respondent from Gulu

*"First of all, to women, access to information and freedom of expression is limited by affordability for example being able to afford being online, it's very expensive. Only a drop in an ocean of the women can afford but the majority cannot because they are struggling with what to eat on the day. So how can these women think of getting money to access the internet. That's a big limitation,"*  
female respondent from Gulu.

*"In urban areas, as stated by a female key informant from Kampala, women seek for approval to access the gadgets from their husbands, first of all, she will be asked why she didn't seek for permission to buy the phone, even the type of phone she has bought will be questioned, all sorts of things, again she will be asked who she talks to using the phone, so often enjoyment, the freedom of expression for a woman is monitored starting from what you say, who you say to and where you say, so it is only small fraction of us who would in our own rights have an online meeting"*

<sup>40</sup> Freedom House (2018) Freedom on the Net/Uganda at <https://freedomhouse.org/report/freedom-net/2018/uganda>

<sup>41</sup> UCC (2015) Access and Usage of ICT across Uganda <https://www.ucc.co.ug/files/downloads/20150130-UCC-access-usage-dissemination.pdf>

<sup>42</sup> World Wide Web Foundation. (2020). Women's Rights Online: closing the digital gender gap for a more equal world, <https://webfoundation.org/research/womens-rights-online-2020/>

<sup>43</sup> National Housing and Population Census 2014 [https://www.ubos.org/wp-content/uploads/publications/03\\_20182014\\_National\\_Census\\_Main\\_Report.pdf](https://www.ubos.org/wp-content/uploads/publications/03_20182014_National_Census_Main_Report.pdf)

## Increased Cases of Online Gender Based Violence, including Cyberbullying and Stalking

The growths of the internet and other digital technologies has raised new human rights and safety concerns. Cyberbullying, online harassment and cyberstalking have become too common, as part of a wider variety of violent behaviors that occur in digital spaces and disproportionately affect women and girls.<sup>44</sup>

In the last few years, the number of women whose nude pictures or videos have been shared online without their consent has been increasing. In the last five years, up to at least 8 Ugandan celebrities, including Judith Heard, Fabiola Anita, Martha Kay, Cindy Sanyu, Sanyu Robina Mweruka, Desire Luzida, Zari Hassan, and Maama Fina have fallen victims to this behavior, allegedly by their ex-boyfriends or people out to blackmail the victims for money.<sup>45</sup> And the 2016 Web Foundation survey, a shocking 45% of female Internet users in Kampala reported having experienced online threats. Women's online expression is also being restricted by frequent Internet shutdowns and mass surveillance<sup>46</sup> Women's online harassment and abuse is further evident in the Web Foundation 2020 report which found out that women are more concerned about their privacy than men. This is because women shared concerns about having their personal data misused, including in relation to online harassment and abuse.<sup>47</sup>

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*“The biggest one is safety, cyber bullying in particular. I know a lot of personal female friends who do not have the same experience like me online. Men are going on line to abuse them, and steal their identities. So, for me the biggest concern is on safety,”*

male HRD from Gulu

*In Peri-urban areas, “the major concern online for women is harassment, of course many times women are harassed on social media, because I have seen many who tag especially saying that my presence online is not for relationship or for love affairs. Of course, many men go ahead and approach them, they are majorly seen or looked at as objects of relationship or sex objects on social media when even when their goal there is accessing information. So, the misperception that a woman, a beautiful woman on social media should be changed. People should change perception, of course this calls for adequate sensitization by the use of social media. Posting pornographic photos as one of the aspects, I think merely looking at a naked person is violence to you; therefore, such pornographic photos being posted on social media equally cost emotional impact to many women. Then the language, many times the language used is sometimes abusive if a woman is not responding to the interest of the one who has posted, she is harassed and abused. So, such are some of the major concerns,”*

male police officer from Gulu.

*In urban areas as stated by a female Key Informant from Kampala, , recently women have suffered cyber bullying, women's nudes are posted on social media without their consent, and really there is no attention mechanism for such categories of people that is why as Uganda Women Parliamentary Association, within the sexual offense bill, we have some kind of protection we are proposing for online users because we know technology is advancing and you cannot stay back, we keep seeing our women's nudes posted on social media without their consent which is a sexual harassment. Similarly, Sylvia Rwambogo was cyber bullied by Ugandans when she reported her case of online sexual harassment.*

<sup>44</sup> ICRW, Defining And Measuring Technology-Facilitated Gender-Based Violence [https://www.icrw.org/wp-content/uploads/2019/03/ICRW\\_TFGBVMarketing\\_Brief\\_v4\\_WebReady.pdf](https://www.icrw.org/wp-content/uploads/2019/03/ICRW_TFGBVMarketing_Brief_v4_WebReady.pdf)

<sup>45</sup> Watchdog (2019) List: 8 Ugandan female celebrities whose nudes have leaked  
<https://www.watchdoguganda.com/entertainment/showbiz/20190614/70395/list-8-ugandan-female-celebrities-whose-nudes-have-leaked.html>

<sup>46</sup> Web Foundation (2016) Women's Rights Online Scorecard Uganda

<sup>47</sup> Web Foundation (2020) Women's Rights Online Report <https://webfoundation.org/research/womens-rights-online-2020/>

## Lack of Knowledge, Skills, and Tools to Safely Navigate the Internet

However, beyond having access to and affording the costs of the internet, utilization of these digital technologies requires the right skills, knowledge, and tools. Unfortunately, majority of women also lack the skills and confidence to engage with digital technologies effectively at every level, starting from basic usage. In Uganda, there are high illiteracy levels among women, which impedes their access to and use of digital technologies. The 2014 shows that literacy levels among females was lower at, 68% compared to that of males, which stood at 77%.<sup>48</sup>

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*“If you would look at education first pyramid in Uganda, you would realize that women tend to be left out, basically on culture basis. And of course, the aspect of not being educated hinders majority to someone per say to get access to read some of those laws. And also, the beat of sensitization, you know many of our laws are not translated into local languages so those who don’t know how to read may not get access to them.”*

Male respondent from Gulu.

*In rural areas, “many women do not have the skills that is why you find them posting, forwarding unnecessarily and some of them have ended up in problems. Not only women but men do not know as many of them just found themselves because the trend has changed and by the time, we started offering ICT services, internet and these social platforms were not there,”*  
says a male respondent from Nakaseke.

*“In urban areas, the fraction of women online is very low if we are to equate, because the majority of women in Uganda to answer your question do not enjoy access to information , they also do not enjoy freedom of expression, one, because of the position they find themselves in, they are illiterate and they don’t have the tools of communication, so when you don’t have the tools for communication which is really freedom of expression and the tool to use, then you cannot access any information according to a female key informant from Kampala”*

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<sup>48</sup> Ibid

## Opportunities to Enhance Women's Status Online

Despite the above challenges, there are several opportunities to improve the status of women online, including the enactment of progressive laws and policies that seek to promote gender equality and reducing the gender digital divide. For example, the government has made some policy commitment to integrate the aspects of marginalized groups such as women and youths, in ICT programs and interventions within the 2014 National ICT Policy, including the implementation of special ICT training programs for women, youth and persons with disabilities.<sup>49</sup> There is also a deliberate emphasis on efforts geared at keeping girls in school and improving their completion rates through addressing both institutional, gender and cultural barriers in collaboration with social, cultural and community groups under the country's Vision 2040.<sup>50</sup>

Additionally, the government, through the Rural Communications Development Fund (RCDF) has intensified its efforts to connect the rural poor. Recently, in partnership with telecom giant, MTN, they launched 22 3G base stations in a bid to ensure broadband service coverage for the whole country, especially the rural unserved and underserved areas that are not economically viable for the private Telecom operators.<sup>51</sup> By the end of 2019, government through the RCDF had implemented ICT Computer Labs in over 1000 Secondary Schools, Tertiary institutions, and Universities.<sup>52</sup>

The recent passage of the Data Protection and Privacy Act, 2019, that provides data subjects, both men and women with legal rights to protect their online identity and to manage or correct information concerning them is also another opportunity for women to exercise and demand respect for their rights, especially online privacy.

## Recommendations

- In order to increase on the access and affordability of the internet by women, the government should negotiate with the internet service providers to reduce on the costs of the internet.
- Government should also consider repealing the 2018 Exercise Duty amendment Act that introduced the OTT tax that has disfranchised vulnerable groups, including women and rural residents from accessing the internet.
- Civil society actors like WOUGNET should develop projects and activities aimed at raising awareness and building the capacity of women to understand and appreciate the digital rights related laws and policies on access to information and freedom of expression online including on the internet and social media.

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<sup>49</sup> Uganda National ICT Policy 2014

<sup>50</sup> Uganda Vision 2040

<sup>51</sup> The Rural Communications Development Fund (RCDF) Project Brief at <https://uccinfo.blog/2019/07/09/the-rural-communications-development-fund-rcdf-project-brief/>

<sup>52</sup> Ibid

## References

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Access to Information Regulations, (2011),

<https://ulii.org/ug/legislation/statutory-instrument/2011/17>

Anti-Terrorism Act, (2002),

<https://www.fia.go.ug/sites/default/files/2020-06/Anti-Terrorism%20Act%2C%202002.pdf>

ARTICLE 19, (2019). Digital Rights:

<https://www.article19.org/issue/digital-rights/> accessed on December 5th 2019

BBC, (2019). 'I was arrested and shamed for leaked nudes': Ugandan model Judith Heard,

<https://www.bbc.com/news/av/world-africa-47612896/i-was-arrested-and-shamed-for-leaked-nudes-ugandan-model-judith-heard>

Collaboration on International ICT Policy for East and Southern Africa, (2014): State of Internet Freedom in Uganda,

[http://cipesa.org/?wpfb\\_dl=235](http://cipesa.org/?wpfb_dl=235)

Computer Misuse Act, (2011),

<https://ulii.org/ug/legislation/act/2015/2-6> Accessed 19 Feb 2021

Daily Monitor, (2015): Sex tapes are part of pervasive levels of violence against women

<https://www.monitor.co.ug/OpEd/Commentary/Sex-tapes-are-part-of-pervasive-levels-of-violence-against-women/689364-2618598-13vi71d/index.html>

Daily Monitor, (2020): Why Uganda's Internet cost is highest in East Africa;

<https://www.monitor.co.ug/Business/Prosper/Why-Uganda-Internet-cost-highest-East-Africa/688616-5442208-xb08c2z/index.html#:~:text=In%20Summary&text=A%20recent%20study%20by%20telecom, respectively%2C%20Uganda's%20is%20the%20highest.>

Data Protection and Privacy Act, (2019),

<https://ict.go.ug/wp-content/uploads/2019/03/Data-Protection-and-Privacy-Act-2019.pdf>

Freedom House, (2018): Freedom on the Net/Uganda at

<https://freedomhouse.org/report/freedom-net/2018/uganda>

<https://treaties.un.org/doc/Publication/UNTS/Volume%201520/volume-1520-I-26363-English.pdf>

accessed on 17 Feb 2021

<https://treaties.un.org/doc/publication/unts/volume%20999/volume-999-i-14668-english.pdf>

accessed on 18 Feb 2021

[https://www.article19.org/data/files/Internet\\_Statement\\_Adopted.pdf](https://www.article19.org/data/files/Internet_Statement_Adopted.pdf) accessed on 19 Feb 2021

International Center for Research on Women, (2019). Defining And Measuring Technology-Facilitated Gender-Based Violence

[https://www.icrw.org/wp-content/uploads/2019/03/ICRW\\_TFGBVMarketing\\_Brief\\_v4\\_WebReady.pdf](https://www.icrw.org/wp-content/uploads/2019/03/ICRW_TFGBVMarketing_Brief_v4_WebReady.pdf)

International Covenant on Civil and Political Rights, (1996): General Comment No. 34 on Article 19 of the ICCPR, Accessed on 13th January 2020 at

<https://bangkok.ohchr.org/programme/documents/general-comment-34.aspx>

**International Covenant on Civil and Political Rights, (1996):**

<https://treaties.un.org/doc/publication/unts/volume%20999/volume-999-i-14668-english.pdf>  
accessed on 20th December 2020

**National Information Technology Authority of Uganda, (2018), National Information and Technology Survey 2017/2018,**

<https://www.nita.go.ug/sites/default/files/publications/National%20IT%20Survey%20April%2010th.pdf>

**PM Daily, (2019). Two charged over leaking Martha Kay's nudes**

<https://www.pmdaily.com/news/2019/08/two-charged-over-leaking-martha-kays-nudes.html>

**Reiko Kuroda, (WD20). Mariana Lopez (GSMA), et la.,(2019): Digital Equity Policy Brief W20 Japan**

<https://www.gsma.com/mobilefordevelopment/wp-content/uploads/2019/02/Digital-Equity-Policy-Brief-W20-Japan.pdf>

**Right to Interception of Citizen's Communication Act, (2010):**

<https://ulii.org/ug/legislation/act/2015/18> Accessed 02 Feb 2021

**The Anti-Pornography Act, (2014),**

<https://ulii.org/system/files/legislation/act/2014/1/Anti%20Pornography%20Act%20of%202014.pdf>

**The Protocol for the African Charter on Human and Peoples' Rights, (2003),**

[https://www.un.org/en/africa/osaa/pdf/au/protocol\\_rights\\_women\\_africa\\_2003.pdf](https://www.un.org/en/africa/osaa/pdf/au/protocol_rights_women_africa_2003.pdf)

**The Rural Communications Development Fund, (2019):Project Brief at**

<https://uccinfo.blog/2019/07/09/the-rural-communications-development-fund-rcdf-project-brief/>

**Uganda Bureau of Statistics, (2014): National Housing and Population Census,**

[https://www.ubos.org/wp-content/uploads/publications/03\\_20182014\\_National\\_Census\\_Main\\_Report.pdf](https://www.ubos.org/wp-content/uploads/publications/03_20182014_National_Census_Main_Report.pdf)

**Uganda Communications Act, (2013):**

<https://www.ug-cert.ug/files/downloads/UCC%20Act%202013.pdf> Accessed 19 Feb 2021

**Uganda Communications Commission, (2015): Access and Usage of ICT across Uganda:**

<https://www.ucc.co.ug/files/downloads/20150130-UCC-access-usage-dissemination.pdf>

**Uganda Communications Commission. (2021): Market Performance Report 3Q20**

<https://www.ucc.co.ug/wp-content/uploads/2021/01/MARKET-PERFORMANCE-REPORT-Q3-2020-Final-compressed.pdf>

**Watchdog, (2019): 8 Ugandan female celebrities whose nudes have leaked**

<https://www.watchdoguganda.com/entertainment/showbiz/20190614/70395/list-8-ugandan-female-celebrities-whose-nudes-have-leaked.html>



World Wide Web Foundation, (2016): Women's Rights Online Scorecard Uganda  
<https://webfoundation.org/research/digital-gender-gap-audit/>

World Wide Web Foundation, (2020): Women's Rights Online: closing the digital gender gap for a more equal world,  
<https://webfoundation.org/research/womens-rights-online-2020/>



# Annex 1: Key Informant Interview Guide

## WOMEN OF UGANDA NETWORK (WOUGNET)

**Survey to assess existing Legal and Regulatory Frameworks governing Freedom of Expression (FoE) and Access to Information (ATI) in Uganda**

### Key Informant Interview Guide

Dear Sir/Madam;

My name is \_\_\_\_\_ I am conducting this interview on behalf of WOUGNET, which is conducting an assessment on the status of Women Rights Online based on regulatory and legal frameworks that govern right to access information and freedom of expression on social media. The survey seeks to among others, Understanding the distribution of access to and use ICT, including social media, internet connectivity among women and men in Uganda? (rural, urban, and peri-urban); analyse and review the existing laws that government/affect the rights to freedom of expression and access to information; and examine how the laws impact women's access to information and freedom of expression online (positive and negative).

You have been identified as one a key informant interviewee given your experience and work around human rights, especially gender, freedom of expression and access to information in Uganda.

The information gathered will be treated with confidentiality, including your identity (should you choose to remain anonymous).

### Section A

Name (Optional)

Gender

Government Agency/Department

Designation (Position)

### Section B

1. The 1995 constitution of Uganda guarantees the right to freedom of expression (article 29) and access to information (article 41). And there are also several laws to that effect. Do women in Uganda know and appreciate that they have these rights?  
Please explain your answer.
2. What are the biggest barriers to women exercising their rights to freedom of expression and access to information, especially online?
3. Do the laws and policies that we have friendly to women to exercise their rights to FoE and ATI especially when it comes to online? Please explain.....
4. What can the government and other stakeholder can do to improve women's enjoyment of their freedom of expression and access to information, especially online?
5. What are some of concerns about women online rights — data collection, harassment, privacy, government and corporate surveillance.
6. Any last comments?

# Annex 2: Focused Group Discussion Interview Guide

## WOMEN OF UGANDA NETWORK (WOUGNET)

**Survey to assess existing legal and regulatory frameworks governing Freedom of Expression (FoE) and Access to Information (ATI) in Uganda**

### Focus Group Discussion Guide

Dear Sir/Madam;

My name is \_\_\_\_\_. We/I am conducting this interview on behalf of WOUGNET, which is conducting an assessment on the status of Women Rights Online based on regulatory and legal frameworks that govern right to access information and freedom of expression on social media. The survey seeks to among others, Understand the distribution of access to and use ICT, including social media, internet connectivity among women and men in Uganda? (rural, urban, and peri-urban); analyze and review the existing laws that government/affect the rights to freedom of expression and access to information; and examine how the laws impact women's access to information and freedom of expression online (positive and negative).

Participation in this study is voluntary. You have a choice to opt out of the interview at any point. The information you provide will be kept confidential and will not be shared with anyone other than the research team and WOUGNET. We therefore request that you feel free to provide frank and honest answers.

### Preliminary Information

\*\*Participants will be requested to register on a general registration form to capture their details.

1. Are you aware of your right to freedom of expression and of access to information online?  
Follow up: What do you know about these rights and how have you exercised these rights?
2. Are these rights are well understood and exercised by women? Why?
3. What are the main challenges that women face in exercising their rights to FOE and ATI, especially online?
4. Do you (we) think that the lack of access to ICTs and the internet has affected how women exercise these rights (FoE/ATI)
5. How can these challenges be overcome?
6. Any last comments/questions?





**Women of Uganda Network**

Plot 360 Kansanga-Ggaba Road | P.O Box 4411, Kampala, Uganda

+256 394 823109 info@wougnet.org

@wougnet

Women of Uganda Network @wougnet1