The State of Radio in Uganda:

A 2020 Review and the New Reality of COVID-19

March 2021

Internews

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Acronyms

ACHPR	African Charter on Human and Peoples' Rights
ACME	African Centre for Media Excellence
BBS	Buganda Broadcasting Services
CBS	Central Broadcasting Services
CIID	Criminal Intelligence and Investigation Directorate
CIPESA	Collaboration on International ICT Policy for East and Southern Africa
CMA	Computer Misuse Act
CSO	Civil Society Organization/s
DISO	District Internal Security Organization
DPC	District Police Commander
FDC	Forum for Democratic Change
HRNJ-U	Human Rights Network for Journalists-Uganda
HURINET-U	Human Rights Network Uganda
ICCPR	International Covenant on Civil and Political Rights
ICESCR	International Covenant on Economic, Social and Cultural Rights
IGP	Inspector General of Police
IMCU	Independent Media Council of Uganda
KCCA	Kampala Capital City Authority
MP	Member of Parliament
MPL	Monitor Publications Limited
NAB	National Association for Broadcasters
NBS	Nile Broadcasting Services
NMG	Nation Media Group
NRM	National Resistance Movement
NTV	Nation Media Television
OTT	Over the Top Tax
PFI	Press Freedom Index
POMA	Public Order Management Act
PSA	Public Service Announcement
RCC	Resident City Commissioner
RDC	Resident District Commissioner
RICA	Regulation of Interception of Communication Act
SDP	Social Democratic Party
SFC	Special Forces Command
UCC	Uganda Communications Commission
UJA	Uganda Journalists Association
UJU	Uganda Journalists Union
UMOA	Uganda Media Owners Association
UNATCOM	Uganda National Commission for UNESCO
UNESCO	United Nations Educational, Scientific and Cultural Organization
UPDF	Uganda People's Defence Forces

Executive Summary

Introduction

With over 309 licensed radio stations, numerous public and private TV stations, and rapid growth in internet accessibility and usage, the media landscape in Uganda is dynamic, diverse and rapidly evolving. Ugandans across the country from rural villages to urban centers are presented increasingly with more channels to meet their wide-ranging information needs.

While radio remains the dominant medium of information for both women and men across Uganda, there remains enormous divides across the country that fuel unequal access to information and media consumption behaviors. The media sector is further challenged by poorly skilled media professionals, low quality journalism, a complex regulatory environment that is often not understood by media professionals and broadcasters, and high levels of self-censorship. The COVID-19 pandemic has both cemented the media's position as an essential service provider, as well as challenged the sector, affecting advertising revenue, employment, the quality and quantity of content production, and the ability to meet the information needs of their audiences.

About Internews and the Assessment

Internews is an international nonprofit organization that empowers people worldwide with trustworthy, high quality news and information, the ability to make informed decisions, participate in their communities, and hold power to account. To investigate the state of the media sector in Uganda with a particular focus on radio, Internews adopted a mixed-methods approach that employed a range of quantitative and qualitative tools. Internews' in-country research team conducted an extensive, desk-based review, deployed a quantitative survey using a call center, and conducted qualitative, key informant interviews (KIIs) with NGOs, government, universities, and media outlets across the country.

This comprehensive effort resulted in "The State of Radio in Uganda: A 2020 Review and the New Reality of COVID-19," which provides critical insights on media outlets' organizational strengths, weaknesses, and needs; their ability to collect, disseminate and meet the diverse information needs of their audiences; the professional capacity of journalists, editors and managers; the legal and regulatory framework; and how the media is fairing as a sector in the new operating environment of COVID-19.

Findings

Overview: 2021 will remain a financially difficult year for nearly all media houses, as businesses will struggle to reach their pre-COVID revenue levels and media strives to meet the information needs of its audiences. Whether the doors will remain open for many radio stations and media outlets in 2021 is yet to be determined. COVID-19 and mounting financial burdens, rising UCC compliance requirements that have forced stations to shutter their doors and increasing targeting of the press and media outlets in the run-up and in the aftermath of the elections will challenge the media sector with some likely to temporarily or permanently close their doors.

It is intended that policymakers, government, civil society, academia, researchers, media development donors, and the media itself will utilize the findings and recommendations

in this resource to identify areas for engagement and investment that would result in a more vibrant sector that provides reliable, quality, timely and localized information. Any support to the media sector should be strategic and sustainable, and focused on inclusively and equitably meeting the information needs of all Ugandans.

The Image of the Sector: Radio stations must improve their approachability and be more client and community focused. Across the board, radio stations in Uganda need to improve their physical and remote reception for persons visiting or calling a station. This would drastically improve advertising revenue and strengthen their engagement with the community. Radio station contact information is vastly out of date; stations are often difficult to physically locate and few have their locations marked on online maps (e.g. google map); staff sitting at the reception desk lack proper communication skills to represent, serve as the physical face of the station, and refer visitors to the appropriate person; most staff lack basic knowledge to present the strengths and mission of their station to visitors; and in general this assessment found stations to be very hierarchal with staff very hesitant to share even non-sensitive information.

Infrastructure and Investment in Technology: There is a need for media to upgrade its ageing studio and production equipment, particularly to improve sound quality and increase their investment in digital and newsroom convergence technologies. While there is a culture and strong market of advertising in the media sector, the small to medium-size outlets can barely generate enough revenue to employ their staff and maintain their basic operations. Majority of the stations do not have the sources of funding to upgrade their studio, broadcast, and transmission equipment or pilot new technologies such as audio-visual equipment for live streaming, which could support the growth of the station. With the involvement of the Ministry of ICT, Uganda Communications Commission, Media Council and donors, a multi-stakeholder fund should be established to provide zero-interest loans and support investment in media equipment and infrastructure.

Financial Health: Radio stations are highly dependent on advertising revenue from businesses and struggle to maintain their market share as the space becomes increasingly crowded. To be financially sustainable, radio stations need training and mentoring in advertising and marketing strategies, must diversify their advertising, innovate, and embrace technologies, such as high-quality mobile and online content.

Sector Advocacy and Multi-stakeholder Coordination: Media associations in Uganda exist but lack cohesion and strength. The existing journalist unions or associations are unable to achieve their intended vision with the current lack of coordination and operation without a unified voice. Media associations and coordination bodies need to coordinate better with government agencies and advocate for policies and regulations that protect journalists both physically and online.[1]

Strengthening Skills and Programming: Journalists must increase their knowledge and technical skills, and Ugandans must have access to higher quality, fact-checked, balanced and in-depth content that engages them across a range of economic and social areas. Across the media sector, improved training that is better aligned to the needs of

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[1] Cohen, Meghan and McIntyre, Karen, "The State of Press Freedom in Uganda," International Journal of Communication 14(2020), 649–668.

the media houses is required. Universities and training institutes need to update their curricula, provide students with the right practical skills, and engage more with the private sector. Academia could also work more closely with industry in both curriculum development and where possible teaching and training. Media owners and managers need to establish and invest in a better training culture that support in-house as well as external training opportunities for journalists across a range of technical skills and topics, such as radio production, presentation, investigative journalism, media law and journalism ethics. Journalists need to diversify their reporting from events and politics and have the skills and knowledge to cover more public interest stories across a range of issues such as climate change, health, social services, tourism and culture. There also needs to be training programs for media managers and owners, in areas such as business reporting and media management. Moreover, increased access to online and virtual training resources aligned to the Uganda context would further support the overall quality and standards within the sector.

Enabling Legal Environment: Greater coordination and collaboration among the Directorate of Information and National Guidance, the Communications Commission, Media Council, Independent Media Council of Uganda, and journalists' associations is needed. Uganda must have a regulatory environment that promotes media pluralism and diversity, supports the healthy growth of the media sector, and maintains high ethical standards, professionalism, and competence of journalists. The implementation of Uganda's policies and laws that should enable the media sector, as well as the government's relationship with the press, has become increasingly complex, with research pointing to a media and civil society space that is increasingly closing. Acts of intimidation and violence against journalists is commonplace, and the mounting physical and digital risks faced by the media has resulted in both self-censorship and often an apolitical writing style. The current environment can be characterized by a number of existing laws that seek to control and criminalize the work of journalists, do not regulate media ownership, and fail to create a conducive atmosphere for freedom of expression. It is imperative that the enabling environment shifts from one that constrains sector growth and criminalizes journalists, to a favorable environment that protects the interests of the sector and safety of journalists. UCC and media stakeholders in concert and consultation should work to harmonize existing regulation, media law and policies, particularly to ensure more transparent and consultative processes for licensing and spectrum allocation.

The legal enabling environment can be improved through strengthened relations and understanding between the media and security organs. More training needs to be carried out with key stakeholders about the role of journalism in democracy and building civic societies, particularly to reduce tensions between police and journalists. Police must be more proactive in investing and prosecuting those who attack journalists in the line of duty, and police must be properly trained to ensure the safety and well-being of journalists covering live events.[2]

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[2] Human Rights Network for Journalists-Uganda, "Press Freedom index Report - 2018 Uganda: Impunity A Cry for Media Freedom," 2018.

Addressing the Gender Gap: Concerted efforts are needed to attract and retain more females into media at all levels to change the male dominated sector. The media sector needs to establish a gender agenda and strategy, where gender is mainstreamed in day-to-day operations, assignments are equitably allocated to both female and male journalists, and women's visibility and issues in news stories is significantly elevated. Donors that support media development need to offer tailored opportunities for females in the sector ranging from journalists and editors to station managers and owners, and their development support should be prioritized for women-owned media houses, as well as outlets willing to establish gender quotas and mainstreaming policies.

Harness Digital and Social Media: The growth of internet in Uganda has been dramatic, with a 25% increase alone in internet subscriptions between October 2019 and October 2020, according to UCC. Digital content production and information consumption is a relatively new and high growth market in Uganda. While online and social media is being used to generate income, most media houses are still learning to commercialize these platforms and have largely not benefited from the full potential of social media platforms. Social media not only offers alternative channels for outlets to disseminate news and information to reach more diverse and far-reaching audiences, but also offers platform for additional revenue streams and from alternative sources to create more revenue streams. Despite the overall low levels of internet penetration in Uganda, there is a need to equip journalists and media houses, particularly small outlets, with digital skills to develop tailored online and mobile content to position themselves to expand and diversify both their audience and advertiser base

Key Results

88%

Of Radio Stations participating in the quantitative survey, utilize audience research, with 53% paying for 3rd party vendors to conduct audience research.
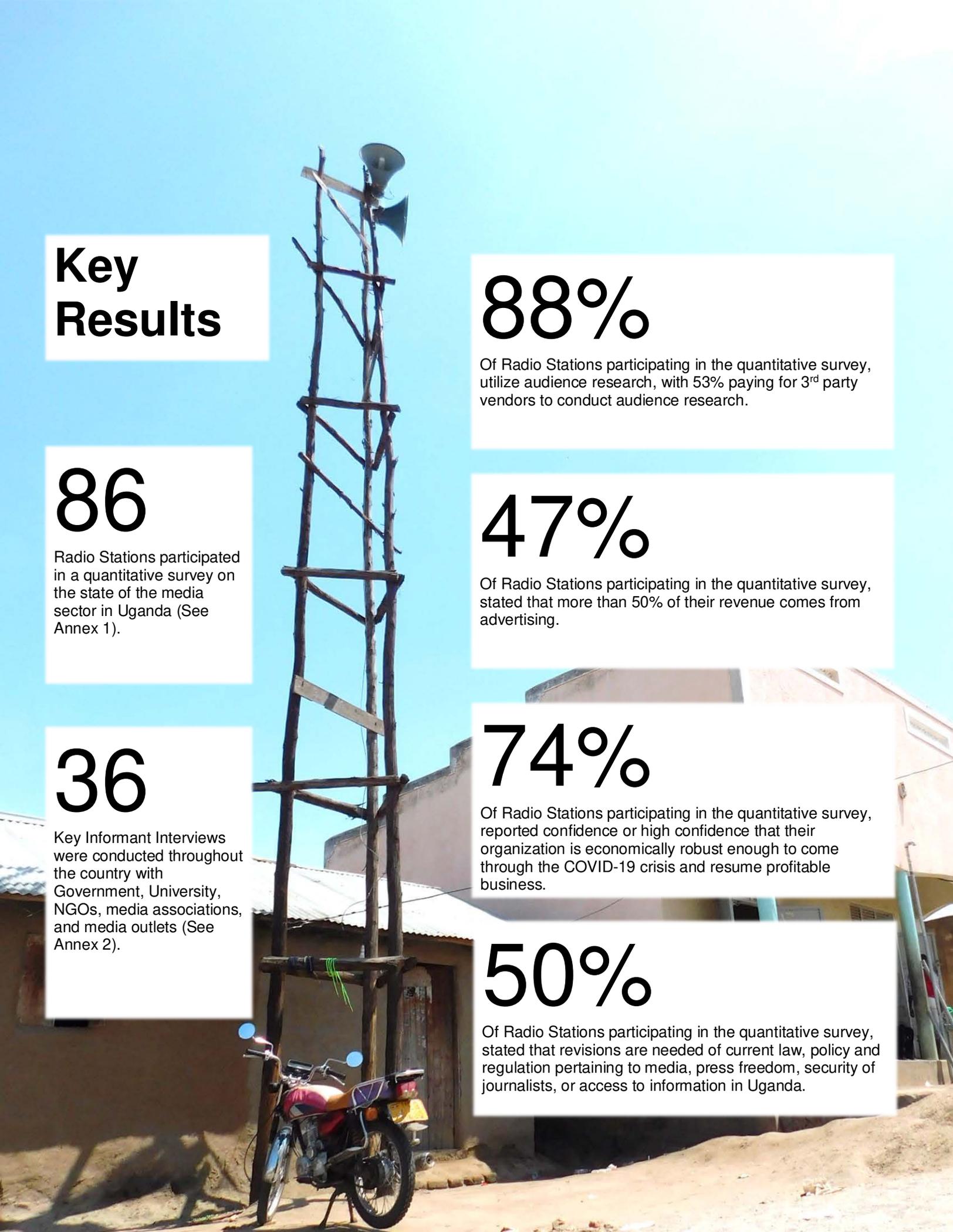
86

Radio Stations participated in a quantitative survey on the state of the media sector in Uganda (See Annex 1).

47%

Of Radio Stations participating in the quantitative survey, stated that more than 50% of their revenue comes from advertising.

36

Key Informant Interviews were conducted throughout the country with Government, University, NGOs, media associations, and media outlets (See Annex 2).

74%

Of Radio Stations participating in the quantitative survey, reported confidence or high confidence that their organization is economically robust enough to come through the COVID-19 crisis and resume profitable business.

50%

Of Radio Stations participating in the quantitative survey, stated that revisions are needed of current law, policy and regulation pertaining to media, press freedom, security of journalists, or access to information in Uganda.

Introduction

Nestled between the Horn of Africa and the Great Lakes region, Uganda is the eighth largest country in Sub-Saharan Africa by population and the 12th largest by economy. With 52 ethnic communities, Uganda has an exploding population, growing consistently above 3% per annum, nearly three times the global average, and expected to reach 100 million by 2050. Between 2000 and 2010, the country experienced economic growth rates averaged 7% per year, and the economy more than doubled from UGX64 trillion in FY 2010/11 to UGX128 trillion in FY2018/19 in nominal terms.

While the nation has seen impressive social and economic progress since its civil war in the 1980s, it still faces an array of development challenges, including those that affect the information landscape and journalism industry.

Uganda - Facts and Figures:

Population (Est. 2020) - 45,741,007

Number of Licensed Radio Stations (March 2020) - 309

Internet Users: 40,000 (December 2000) to 18,502,166 (December 2019)

Internet Growth (last decade) - 46,155%

Internet Penetration (% population) - 40.4%

Sources: Uganda Bureau of Statistics, Freedom House, Uganda Communications Commission

With over 309 licensed radio stations, numerous public and private TV stations, and rapid growth in internet accessibility and usage, the media landscape in Uganda is dynamic, diverse, and rapidly evolving. Ugandans across the country from rural villages to urban centers are presented increasingly with more channels and sources of information to meet their wide-ranging educational and entertainment needs.

While access to media and information is largely not a constraint, there are a range of challenges and obstacles that affect the quality of journalism and the media sector at large. These include but are not limited to an education system that is not aligned to the needs of the market, a lack of coordination among national media association and advocacy bodies, poor working relations between government and the media industry, an informal working environment characterized by low pay, poor investment by media owners in equipment and training, and intimidation from government officials and agencies. These challenges have contributed to poorly skilled media professionals, low quality and shallow journalism, a complex regulatory environment that is often not understood by media professionals and broadcasters, and high levels of self-censorship.

The COVID-19 pandemic has caused a dramatic slowdown of economic activity globally, imposed enormous costs on national economies, and has subsequently brought a range of challenges and uncertainties that will continue to test the resolve of Uganda's information and media landscape in both the short and medium-term. In response to COVID-19, Uganda enacted restrictive measures to prevent the spread of the virus. Beginning on March 18, 2020, the government banned vehicle movements, closed borders, businesses, and schools, and instituted a nationwide curfew. All sectors of the economy, including the media, were deeply impacted by the restrictions. Overnight the

media sector experienced a decline in business activity, which affected employment, the quality and quantity of content production, and thus the ability to meet the information needs of their audiences.

Purpose of the Assessment

The purpose of this assessment is to provide timely and updated information about the state of the media sector in Uganda, and seeks to explore the following research questions:

- What training, equipment or other resources would strengthen the media's ability, particularly radio outlets, to practice higher quality journalism?
- To what extent are the media legal and regulatory frameworks supportive and enabling of media outlets and journalists?
- What is the impact of COVID-19 and the associated public health and containment measures on the media's ability to operate, program and meet the information needs of its audience?

The following assessment provides critical insights on media outlets organizational strengths, weaknesses, and needs with a focus on financial sustainability; outlets' ability to collect and disseminate information and content to its audience and how they meet their diverse information needs; the professional capacity of journalists, editors, and managers; the legal and regulatory framework; and how the media is fairing as a sector in the new operating environment of COVID-19. It is intended that policymakers, government, civil society, academia, researchers, media development donors, and the media itself will use this resource to identify areas for investment that would result in a more vibrant sector that provides reliable, timely, and contextualized information to all Ugandans.

Methodology

This assessment adopted a mixed-methods approach that employed a range of quantitative and qualitative tools to investigate the state of Uganda's media sector with a focus on radio. Over the course of a three-month period, Internews conducted an extensive, desk-based review, deployed a remote quantitative survey through the use of a call center, and conducted qualitative, key informant interviews (KIIs) across the country with a wide range of actors from non-governmental organizations (NGOs), government, universities, and media outlets.

Through the survey tools and KIIs, Internews interviewed over 100 institutions and persons across the media sector (See Annex 1 and 2 for further information), representing:

- Media practitioners and outlets from print, broadcast, private/commercial, public and community media;
- Media regulators and government representatives from the Uganda Communications Commission;

- Civil Society Organizations and Media development associations, including the African Centre for Media Excellence, Human Rights Network for Journalists, Karamoja Journalist Association, Media Challenge Initiative, National Association of Broadcasters, Northern Uganda Media Club, Uganda Editors' Guild, Uganda Media Women's Association, and West Nile Journalist Association; and
- Universities and Training Institutes, such as Uganda Christian University and Makerere University.

Desk-based Review

A desk-based review was conducted to review, analyze, and contextualize existing studies, assessments, and research. While this report builds on a range of other notable works in this space, there has not been a recent and comprehensive, public assessment of the sector.[3] Existing literature addressed in detail topics, such as media law, press freedoms, regulatory framework, plurality and diversity of media, and media as a platform for democratic discourse. These studies included legal analysis, trend analysis on the violation against journalists, and how the perception of press freedom enable or limit the media to operate.[4]

Quantitative Data Collection: Quantitative Survey

In November 2020, Internews setup a call center in Kampala to implement a quantitative survey that targeted radio stations across the country. Of the 309 legally licensed radio stations, 86 radio stations (28%) fully participated in the extensive quantitative survey. The survey questionnaire, which built upon Internews extensive history of surveying radio stations in Sub-Saharan Africa, asked respondents a series of questions pertaining to their: organizational history, financial and governance structures; online and social media presence; staffing and employment practices; programming and content production; advertising and audience engagement; training practices and needs; legal and regulatory environment, and the impact of COVID-19 on their business.

Figure 1: Regional overview of radio stations that participated in the quantitative survey

Region	#	%
East	16	19%
North	18	21%
West	21	24%
Central	31	36%
Total	86	

Internews trained enumerators who administered the survey in English at the call center, and data collected from each participating radio station was inputted into a KoBo Toolbox survey that had been loaded onto a tablet. After each day, the data was checked for quality, outliers, and major inconsistencies, and follow up calls were conducted as required to further verify and vet the accuracy of the information. The data was analyzed

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[3] UNESCO's Assessment of Media Development in Uganda was conducted in 2013 but published in 2018; A. Fiedler, M. Meyen, "Information, Education, Participation: Media Use among Youth in Uganda," DW Akademie, 2016.
[4] Reporters without Borders, "World Press Freedom Index: Uganda," 2018, Uganda; Human Rights Network for Journalists-Uganda, "Press Freedom index Report - 2018 Uganda: Impunity A Cry for Media Freedom," 2018. Cohen, Meghan and McIntyre, Karen, "The State of Press Freedom in Uganda," International Journal of Communication 14(2020), 649–668.

and validated by Internews in-country team, as well as the regional team based in Nairobi, Kenya.

The quantitative survey was geographically representative with the headquarters of participating radio stations located across 40 districts, broadcasting across 126 of the 134 districts in Uganda, and represented across all 14 of the UCC defined broadcasting zones. The following table provides an overview of the 14 UCC geographic broadcasting zones and the breakdown of registered stations per zone:

Figure 2: Geographic dispersion of radio stations according to the 14 UCC broadcast zones

Zone	Geography	# of Stations	%
1	Arua, Yumbe, Koboko, Maracha, Zombo, Nebbi	15	5%
2	Gulu, Moyo, Adjumani, Amuru, Nyoya	22	7%
3	Lamwo, Pader, Kigum, Agago	9	3%
4	Oyam, Kole, Lira, Alebatong, Otuke, Apac, Dokolo, Amolatar	16	5%
5	Kabong, Abim, Kotido, Napak, Moroto, Amudat, Nakapiripirit	5	2%
6	Amuria, Katakwi, Soroti, Kaberamaido, Serere, Ngora, Kumi	12	4%
7	Mbale, Bulanbuli, Kween, Kapchorwa, Bukwa, Sironko, Bududa, Manafwa, Tororo, Butaleja, Budaka, Bukedea,	27	9%
8	Jinja, Buyende, Kaliro, Kamuli, Namutumba, Iganga, Bugiri, Mayuge, Buikwe, Luuka, Namayingo,	20	6%
9	Kampala, Wakiso, Mukono, Luwero, Nakaseke, Nakaaongola, Kayunga	63	20%
10	Masindi, Hoima, Buliisa, Kiryadong	13	4%
11	Mpigi, Butambala, Gomba, Mubende, Kiboga, Kyankwanzi	10	3%
12	Masaka, Sembabule, Bukomansimbi, Kalungu, Lwengo, Rakai	18	6%
13	Kibaale, Ntoroko, Kyenjojo, Kyegegwa, Kabarole, Kamwenge	28	9%
14	Kiruhura, Isingiro, Mbarara, Ntungamo, Ibanda, Buhweju, Bushenyi, Shema, Rukungiri, Rubirizi, Mitoma, Kanungu, Kabale, Kiaoro	51	17%
	Total	**309**	

Qualitative Data Collection: Key Informant Interviews

Semi-structured key informant interviews (KIIs) were conducted to complement both the desk-based review and quantitative data collected through the call center. KIIs were conducted in Kampala as well as during personal visits outside of Kampala to radio stations predominantly located in the Central and Southwest regions of the country. The semi-structured interviews addressed a range of timely issues, such as reporting gaps and limitations of journalists, the ability of the media to meet the information needs of a highly diverse Ugandan population, financial sustainability of the sector, innovative and

uses of social media, issues concerning security and safety, as well as opportunities and challenges that the COVID-19 pandemic presented to the sector.

Key informants were represented from academia, government, media associations, media outlets, and the NGO community, and purposively sampled for their in-depth knowledge and professional association in government policy and regulation, media law and freedom, journalist training, and content production and broadcasting.

KIIs were conducted with 36 informants. Interviews were transcribed by the Internews interviewer into a Microsoft Excel gird. The grid was subsequently populated for each interview, and comparative analysis was then conducted to identify key themes and trends across the interviews. The names of certain persons have been deliberately withheld to ensure their overall safety and security. (For further information, please refer to Annex 2).

Constraints, Limitations, and Reflections

Religion: The survey tools did not thoroughly take into consideration the critical role that religion and faith-based radio stations play in the media landscape in Uganda. A further study assessing these radio stations and religious programming in general would be warranted. In addition to the overall number of faith-based stations, religious programming and content is an important element of most stations. For example, the qualitative survey extensively mapped radio stations in Kasese and Kabarole Districts. Of the 4 stations physically located in Kasese town, 3 are faith-based (Light FM – Adventist, Messiah FM – Anglican Diocese, and Kasese Guide Radio- Catholic Diocese), and the other is the government-operated UBC Ngeya FM. Similarly, in Fort Portal, faith-based stations, such as Jubilee FM – Catholic Diocese and Life FM – Pentecostal, represent an important share of the overall media environment.

Media Monitoring: While the African Centre for Media Excellence (ACME) produces media monitoring reports, there is not sufficient and widely disseminated media monitoring reports that assess the quality and diversity of content that is accessible to audiences across diverse mediums. Since this was not within the scope of this assessment, future studies should comprehensively monitor the media to offer recommendations for diversifying program content and quality across various mediums.

Gender: This assessment is deeply concerned with the overall involvement of women in the media sector in Uganda, and the poor participation of women was evident during implementation of both the survey and KIIs. For example, over 86% of the quantitative survey respondents were male. This unfortunately is not a methodological gap of this assessment. There is a gross gender imbalance at all levels of the media sector from journalists and radio presenters, to station managers and owners. During the in-person field visit to radio stations, one staff person, when asked why their media outlet employed nearly an all-male staff, arrogantly responded, that "women in these parts don't value education." During a KII, a respondent explained that all their DJs were male, as the audience considered this to be a male role.

Television and Print Media: This study did not focus on the TV and print sector in Uganda. Both of these mediums have a Kampala centric ownership, and their audiences are

mainly located in Kampala, urban and peri-urban centers. For example, the circulation of top print publications such as New Vision, the Monitor and Independent are concentrated in Kampala, and ownership is largely concentrated to the Vision Group and Nation Media Group. Moreover, high levels of illiteracy throughout Uganda, poor access to electricity, and weak distribution networks further reduce access and use within rural Uganda to both mediums.[5]

As the country moves towards middle-income status and access to the electric grid increases, television will play a greater role in the media and information landscape in Uganda, particularly beyond urban centers. In 2017/18, 41.3% of individuals said they watched TV, according to the National Information Technology survey. There is a huge divide, however, in television ownership between rural and urban centers. At a national level, 10% of households reported that a television was owned individually, with 42% of households in Kampala reporting that they owned a television individually, while less than 5% of households in Kigezi (3%), Teso (2%), Bukedi (2%), Acholi (2%) and West Nile (1%) reported that they own a television.[6]

Profile of Listeners

The spread of mobile phones, communication systems, and the internet has had a big impact on job creation, business development, and the transformation of several industry and business sectors across Uganda. This development has not happened in isolation and the media sector and wider media landscape have greatly benefited from these technology and digital transformations.[7] There however remains enormous divides across the country based on gender, income, education, and urban and rural populations. These divides fuel unequal access to information and media consumption behaviors.

Figure 3: Percentage of households possessing various household effects, UDHS 2016

Household effects	Urban	Rural	Total
Radio	66.9	55.6	58.5
Television	44.3	7.4	16.9
Mobile Phone	89.9	68.8	74.3
Computer	10.8	1.4	3.8

To ensure inclusive and equitable access to information for all persons to have the information they need in the format and language required to make informed decisions, it is critical that all actors in the media landscape understand the complex and diverse profiles of listeners throughout Uganda:

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[5] A. Fiedler, M. Meyen, "Information, Education, Participation: Media Use among Youth in Uganda," DW Akademie, 2016.
[6] Uganda Bureau of Statistics, "Uganda National Household Survey 2016/2017," 2018.
[7] Kenechi Okeleke, "Uganda: Driving Inclusive socio-economic progress through mobile enabled digital transformation," GSMA, 2019.

Rural-Urban Divide: Rural women, when compared to their urban counterparts, are more likely to have no regular exposure to any form of mass media (40% versus 21%). The same pattern holds true for men (28% versus 12%).[8]

Education Divide: One-third (33%) of women and two-fifths (41%) of men aged 15-49 have completed some secondary-level education or higher.[9] Exposure to the three forms of mass media increases with increasing education level. The proportion of women with exposure to all three forms of media rises from 0.2% among those with no education to 28% among those with more than a secondary-level education. Among men, the corresponding increase is from 0% to 35%.[10]

Literacy: Nearly 7 in 10 women (68%) and 8 in 10 men (79%) are literate. The literacy rate is lower among rural residents (61%) than those residing in urban areas (79%). Literacy is highest among the youth (18-30 years) (75%), but literacy decreases with an increase in age. Additionally, literacy levels vary by location, and literacy rates among the adult population residing in the Northern region (54%) was lowest compared to the other regions.[11]

Internet Divide: Internet usage among women and men increases with increasing education level and wealth quintile. 55% of women and 68% of men with more than a secondary education used the Internet in the past 12 months, as compared with 0% of women and 2% of men with no education. Similarly, 28% of women and 54% of men in the highest wealth quintile used the Internet during the past 12 months, compared with 0.4% of women and 5% of men in the lowest wealth quintile. [12]

Gender Divide: While access to information is essential in increasing people's knowledge and awareness of what happens around them, regular exposure to mass media is low. The Uganda Bureau of Statistics, "Uganda Demographic and Health Survey (UDHS)," found that only 5% of women and 10% of men have access to three specified types of mass media (newspaper, television, and radio) on a weekly basis. Men are more likely (10%) than women (5%) to access all three forms of media (newspaper, television, and radio) on a weekly basis (Figure 3.4). Slightly more than one third (35%) of women and nearly one quarter (24%) of men do not access any of the three media on a weekly basis.[13]

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[8] Uganda Bureau of Statistics, "Uganda Demographic and Health Survey (UDHS), 2016." January 2018.
[9] Uganda Bureau of Statistics, "Uganda Demographic and Health Survey (UDHS), 2016." January 2018.
[10] Uganda Bureau of Statistics, "Uganda Demographic and Health Survey (UDHS), 2016." January 2018.
[11] Uganda Bureau of Statistics, "The National Governance Peace and Security Survey 2017," April 2018.
[12] Uganda Bureau of Statistics, "Uganda Demographic and Health Survey (UDHS), 2016." January 2018.
[13] Uganda Bureau of Statistics, "Uganda Demographic and Health Survey (UDHS), 2016." January 2018.

Uganda's Media Landscape

The origin of the media sector in Uganda is typically traced to the 1909 publication of Mengo Notes, the first newsletter by the Church Missionary Society, and the first privately owned commercial newspaper, The Uganda Herald, which was established in 1912. From 1953 – 1993, the broadcast sector was under the control of the government with one radio station (Radio Uganda), one TV station (Uganda TV), and a government newspaper.

As Uganda began to adopt widespread liberalization, this soon extended to the broadcast sector, and in 1993, the first privately owned radio station (Sanyu FM, previously known as Radio Sanyu) went on air. The latter 1990s and continuing into the 21st century witnessed a dramatic growth in FM and TV stations. For example, of the 86 stations that participated in the quantitative survey, only 13 (15%) were established before 2000, whereas 47 (55%) were established between 2000-2010. The completion of digital migration in 2015 further led to the growth in the number of channels that viewers could access.

In 1996, there were only 14 registered radio stations, which has grown by nearly 150 radio stations every 10 years; currently, there are 309 licensed radio station as per the Uganda Communication Commission (UCC). In regard to TV, in 1996, there were only 4 stations, which grew to 32 stations in 2007, and to 51 registered stations reportedly in 2019.

Figure 4: Growth of licensed radio and TV stations in Uganda
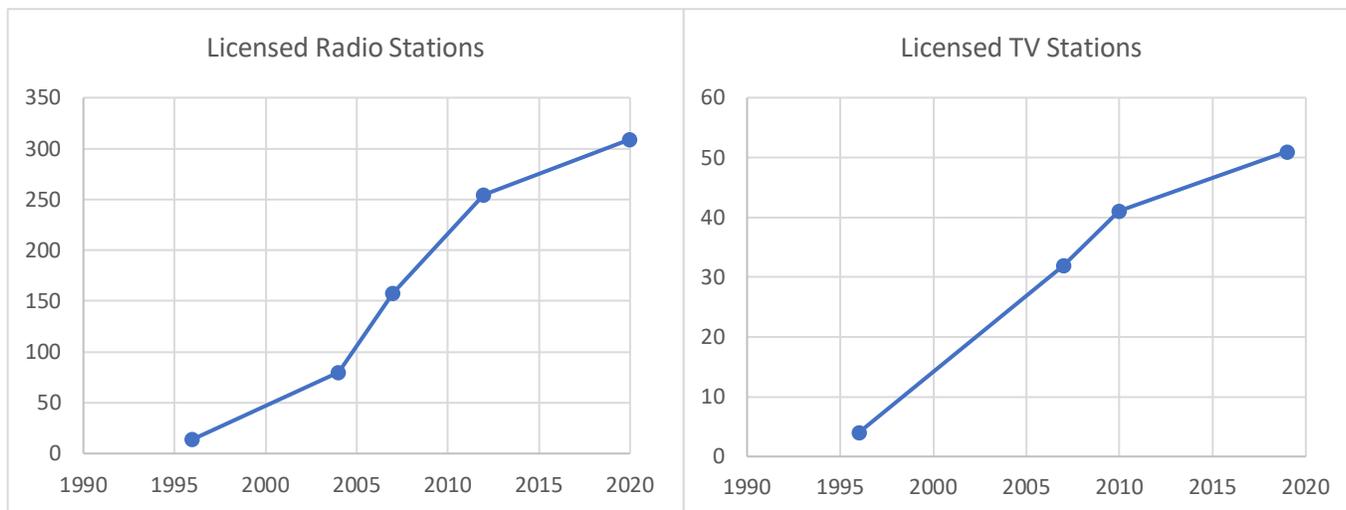
The first wave of radio stations were largely setup by private business people and enterprises followed by faith-based radio stations. This growth brought about increased competition in the media sector. The wide range of public, private, and community-based stations that were programming at the time contributed to a greater diversity of information, particularly as compared to the previous decade of government-controlled airwaves. While media pluralism and diversity has largely been championed in Uganda

because it offered more choices to listeners at least theoretically, recently, there is a growing trend of radio stations in Uganda being set up by politicians.[14]

Despite the expansive number of radio and TV stations, two media conglomerates, namely Vision Group and the Nation Media Group, dominate the sector and greatly influence the media narrative and landscape across the country.[15] The Vision Group is listed on the Uganda Securities Exchange, with the Government holding 53.3% of the shares, and the Nation Media Group (NMG) is publicly listed on the Nairobi Stock Exchange.[16]

Enabling Legal Environment

The laws and policies that regulate the media landscape, particularly that govern the broadcast sector, and both enable and restrict access to information and press freedom, are complex and continually evolving. Uganda does have established legal and policy frameworks to foster a conducive media enabling environment, particularly to uphold basic rights and freedoms such as freedom of the press, freedom of expression, and access to information, as well as a court system that regularly rules in favor of journalists' rights. The Constitution protects civil, political, economic, social, and cultural rights, explicitly guaranteeing every person the right to freedom of speech and expression, including freedom of the press (Article 29), and further providing that everyone shall have the right of access to information in possession of the State (Article 41). Additionally, Uganda's judiciary bodies and Uganda Human Rights Commission (UHRC) independently monitor, investigate and adjudicate human rights' violations.

There are two main bodies largely responsible for the regulation of the media sector in Uganda: the Uganda Communications Commission (UCC), established by the Uganda Communications Act (1997, amended in 2000) and responsible for allocating and licensing the use of the radio frequency spectrum, and the Media Council, established by the Press and Journalist Act (1995) and responsible for overseeing the ethical standards of the media.[17]

During visits to radio stations, numerous managers mentioned the controversial requirement by UCC that mandates that all radio stations allocate a free weekly government hour for the office of the Resident District Commissioners (RDCs). UCC has received a series of complaints from radio station managers across the country about this matter.[18] During an interview with one radio station, the station claimed misuse by the RDC office who regularly re-allocate their hour to other entities, which represents a significant loss in other sources of potential advertising revenue.

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[14] Dr. George W. Lugalambi, Dr Peter G. Mwesige, and Hendrik Bussiek, "Uganda: A survey by the Africa Governance Monitoring and Advocacy Project," Open Society Initiative for East Africa, 2010.

[15] As of December 2020, the Vision Group for example has 10 Newspaper titles (New Vision, Saturday Vision, Sunday Vision, Bukedde, Bukedde Lwomukaaga, Bukedde ku Sande, Orumuri, Etop, Rupiny and Kampala Sun); 3 Television Stations (Bukedde, TV West and Urban); and 6 Radio Stations (X FM, Bukedde FM, Radio West, Radio Etop, Radio Rupiny and Arua One FM)

[16] Vision Group, Shareholders, https://visiongroup.co.ug/shareholders/

[17] Goretti Linda Nassanga and William Tayeebwa, "Assessment of Media Development in Uganda: Based on UNESCO's Media Development Indicators," UNESCO, 2018; Note that the Broadcasting Council merged with the UCC following the passage of the Uganda Communications Act (2013).

[18] "UCC under pressure to scrap free government hour on radios," West Nile Web, May 18, 2019, https://www.westnileweb.com/news-a-analysis/pakwach/ucc-under-pressure-to-scrap-free-government-hour-on-radios

The lack of transparency and clarity about the licensing process was another frequent complaint from participants of the assessment. UCC overhauled their licensing system in 2020, requiring all radio broadcasters in Uganda to submit fresh applications for radio broadcasting licenses by July 31, 2020.[19] Under the new regime, different license fees are applied for commercial and communal broadcasting services, and the license period has changed from a one-year to a five-year license. License fees have been revised with the annual license fees for commercial radio Tier 1 (national radio) fixed at 7 million UGX; Tier 2 (Kampala region) at 5.6 million UGX; Tier 3 (regional cities) at 4.2 million UGX; and Tier 4 (rest of the country) at 3.5 million UGX. Community radios, on the other hand, now must pay 1.4 million UGX in annual license fees, whereas license fees for community radio stations were previously not mandated. While for most media outlets the license fees were reduced, the new structure has introduced new fees for community radio stations.

Brian Kizito media entrepreneur and owner of Kasanda Community Farmers Radio (92.8 FM) in Mubende and Buyamba FM in Lyantonde awaits his official licenses from the UCC regulator, while still broadcasting in his quest to meet the critical information needs of agriculture communities. (Credit Internews, 2020).

Moreover, in addition to the annual license fee, the new framework states: "The broadcasters are required to annually make a 2% contribution from their gross annual revenues to the Commission."[20] It is surprising to note that both media outlets and associations are vastly quiet about the 2% requirement, and no respondent during the quantitative or qualitative interview made any reference to this new policy.

At the international level, Uganda is a signatory to treaties that protect and promote freedom of expression, such as the Universal Declaration of Human Rights (UDHR), the International Covenant on Civil and Political Rights (ICCPR), as well as the African Charter for Human and People's Rights.

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[19] UCC, https://uccinfo.blog/2020/07/25/revised-radio-licensing-framework-explained-all-radio-broadcasters-in-uganda-are-required-to-submit-fresh-applications-for-radio-broadcasting-licenses-by-july-31-2020/
[20] Ibid.

In theory, Uganda does have favorable national legislation and participates in international treaties. In practice, however, the implementation of these policies and laws, as well as the government's relationship with the press, has become increasingly complex, particularly in recent years. While Uganda's policy and legislative framework appears to reflect a "liberalized media system," in practice, over the past two decades, research and trends point to a media and civil society space that is increasingly closing.[21]

There are numerous legal and extralegal mechanisms, even within the Constitution, that limit access to information, undermine the media sector and restrict freedom of expression. President Yoweri Kaguta Museveni and the National Resistance Movement (NRM) party, who have been in power since 1986, often harness this legislation in the name of public safety to justify their actions and restrict basic liberties, association, and peaceful assembly, particularly against those with oppositional or contentious views and beliefs. For example, Article 43 of the Constitution places conditions on these freedoms, stating "no person shall prejudice the fundamental or other human rights and freedoms of others or the public interest."

Notable Media Restrictions and Violations, 2018-2020

- Police repeatedly use force to disrupt rallies and protests organized by political oppositions, resulting in the assault, denial of access, confiscation and damage to equipment, unlawful arrest and detention of journalists.
- A hit list with the names of 12 journalists and reasons why they should be killed was sent to the offices of the South Buganda Journalists Association (2018).
- Uganda's Unity FM radio station in Lira was raided by heavily armed police personnel and military officers, taken off air and 6 of their journalists were arrested for allegedly inciting violence (2018)
- Media regulator ordered the suspension of 39 journalists at 13 outlets, but the move was blocked by a court.
- Stella Nyanzi, a prominent academic, was accused under the Computer Misuse Act for Facebook posts that were critical of the President and sentenced to 18 months in prison
- Team of British Journalists arrested and temporarily detained while investigating the illegal sale of drugs from public health facilities
- UCC ordered the Daily Monitor to shut down its website, accusing it of failing to register (February 2019)
- In a span of 2 weeks, three radio stations (Kiira FM- Jinja, Hope Radio- Kabale, and Mubende FM) were raided and shutdown for hosting Dr. Kizza Besigye, the former leader of the opposition party Forum for Democratic Change. In all the instances, no authoritative directives from the UCC were presented by the police (2019).
- UCC warned 5 broadcasters that their coverage of political affairs and protests violated license agreements and ordered Pearl FM to suspend their popular political talk show (October 2019)

Sources: Freedom House, Freedom of the World 2020

The Penal Code Act (1950), which dates to the colonial period, is one of the most deployed pieces of legislation to limit the media sector. Section 37 (on national security),

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[21] Cohen, Meghan and McIntyre, Karen, "The State of Press Freedom in Uganda," International Journal of Communication 14(2020), 649–668.

section 41 (on promotion of sectarianism), section 51 (on inciting violence), and section 53 (on defamation of foreign princes) are a few sections within the Act that are used to restrict freedoms.[22] Moreover, under the Code of Ethics in the Press and Journalists Act (1995), journalists have a legal right to protect their sources: "No journalist shall disclose the source of his or her information; he or she shall only divulge the source in the event of an overriding consideration of public interest and within the framework of the law of Uganda." However, this legal right is largely not respected by government, security forces and police, and journalists and media houses are often coerced and compelled to disclose their sources to authorities under the Anti-Terrorism Act (2002).

Other notable legislation that is used to suppress the media in the name of national security, include but is not limited to: the Press and Journalist Act 2000; the Anti-Terrorism Act 2002; the Referendum and Other Provisions Act 2005; the Parliamentary Elections Act 2005; the Regulation of Interception of Communication Act 2010; the Anti-Terrorism Act; Computer Misuse Act of 2011; the Uganda Communications Act 2013; the Public Order Management Act, 2013 (POMA); The Communication Amendment Bill (2016) (which amended Section 93(1) of the Uganda Communications Act 2013); and the Anti-Pornography Act 2014.[23]

This assessment validated the media's concern with laws pertaining to the sector and the overall enabling environment. Many KIIs, choosing to remain anonymous, exclaimed that many of the existing laws in Uganda currently do not safeguard the growth of media, but rather seek to control the sector and criminalize the work of journalists. Across all deployed survey tools, respondents expressed a growing need to have staff of all types trained and more informed of media laws, partly given the complexity and the ever-evolving regulations.

While over 50% of respondents who participated in the quantitative survey stated that revisions are needed of current law, policy and regulation pertaining to media, press freedom, security of journalists, and access to information in Uganda, most respondents could not accurately recall or cite the specific name of the law, policy, or regulation. Access to Information, Public Order Management, Computer Misuse Act, and Press & Journalist Act were, however, the common responses to laws that needed to be revised.

Additionally, during the KIIs, respondents frequently called for improved coordination between media houses and the UCC, particularly to establish more consultative and inclusive processes when establishing or revising existing laws and policies.

It is, therefore, imperative that the enabling environment shifts from one that constrains and does not protect the interests of the sector, to a favorable regulatory framework that seeks to buttress and bolster the growth of the media to maintain high ethical standards, professionalism, and competence of journalists.

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[22] Goretti Linda Nassanga and William Tayeebwa, "Assessment of Media Development in Uganda: Based on UNESCO's Media Development Indicators," UNESCO, 2018.

[23] IFEX, "Threats, violence, laws, and taxes: The many approaches to stifling access to information in Uganda," 27 August 2019, https://ifex.org/threats-violence-laws-and-taxes-the-many-approaches-to-stifling-access-to-information-in-uganda/

Figure 5: Quantitative survey responses regarding the laws, policies and regulations that govern the media

Do you believe the laws, policies and regulations in Uganda create an enabling environment for the media to operate?

Prefer Not to Say , 6, 7%

No / Not Aware , 39, 45%

Yes, 41, 48%

Is there a current law, policy and regulation pertaining to media, press freedom, security of journalists, or access to information in Uganda that needs to be revised or reviewed?

Don't Know , 10, 12%

Prefer Not to Say , 13, 15%

No / Not Aware , 20, 23%

Yes, 43, 50%

Do you believe the laws, policies or regulations in Uganda promote press freedom?

Prefer Not to Say , 4, 4%

No / Not Aware , 47, 55%

Yes, 35, 41%

Do you believe the laws, policies or regulations in Uganda promote access to information?

Prefer Not to Say , 8, 9%

No / Not Aware , 26, 30%

Yes, 52, 61%

Regulating the Internet and Social Media

Access to information on the internet has wide potential for improving access to information overall, expanding economic opportunities, and improving educational and health outcomes, particularly for developing countries seeking to reach middle-income status.

Around 20 million people have a mobile subscription, representing 44% of the population with nearly half of all mobile subscribers also having access to mobile internet services. By June 2018, there were nearly 10 million mobile internet connections in Uganda – a penetration rate of 23%.[24]

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[24] Kenechi Okeleke, "Uganda: Driving Inclusive soci-economic progress through mobile enabled digital transformation," GSMA, 2019.

For both media outlets and citizens seeking to access information, however, the internet and online activities are increasingly being more regulated by the government. The government is both criminalizing online behaviors and seeking to make money from those accessing online services. Under section 24 and section 25 of the Computer Misuse Act (2011), for example, all persons in Uganda can be held accountable under these provisions for their online behavior.

The passage of the controversial Excise Duty (Amendment) Bill, which went into effect on July 1, 2018, requires users of over-the-top (OTP) platforms such as WhatsApp, Facebook, Twitter, and Instagram to pay a mandatory daily levy of 200 Ugandan Shillings (about $0.05 cents) to access these information services.[25] This daily tax was the first of its kind in Africa, and denies individuals, particularly vulnerable persons, such as the poor, their fundamental right to access to information. This tax has been heavily protested, with criticism mounting during COVID-19. The government relied heavily upon social media to disseminate critical information on COVID-19, particularly during the lock down period. However, many financially constrained Ugandans, who were unable to pay the tax during the COVID-19 lockdown period, were subsequently unable to access these critical resources.

The UCC issued a directive requiring online publishers to pay a $20 registration fee to obtain a license that will permit them to "carry out their communication and commercial services online in the country." The regulator also ordered several websites with prominent online followings to be blocked, until they registered and paid an annual fee ($20).

Journalist Safety

Numerous reports over the past two decades state that Uganda's media sector suffers from physical and legal harassment, with a closing civic space. Uganda's President, Yoweri Museveni, tolerates little to no criticism from the media, and he often chastises the media, as in a 2018 press conference when he called journalists "parasites."[26] The president has also often publicly threatened to close radio stations or to arrest broadcasters that he felt were inciting the public.

Reporters without Borders notes that acts of intimidation and violence against journalists is commonplace with security services often targeting journalists, particularly for criticizing authorities, resulting in their arbitrary detention and confiscation of their equipment.

Regulating the Net

56 out of 100 (15/25 obstacles to access; 21/35 limits on content; and 20/40 Violations of User Rights (Freedom of the Net 2020)

1 out of 4 - Free and independent media

56 out of 100 on the Internet Freedom Score

Uganda's World Press Freedom Index ranking has dropped by over 20% in the past 7 years from 104 out of 180 in 2013, to 112/180 in 2017, to 125/180 in 2019.

Source: Freedom House, Freedom of the World 2020, Uganda Profile; Reporters Without Borders, "2020 World Press Freedom Index,

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[25] IFEX, "Uganda's new law imposes tax on users of social media platforms," 3 June 2018, https://ifex.org/ugandas-new-law-imposes-tax-on-users-of-social-media-platforms/
[26] A. Fiedler, M. Meyen, "Information, Education, Participation: Media Use among Youth in Uganda," DW Akademie, 2016.

The HRNJ-U documented 163 cases of violations and abuses aimed at individual journalists and their media houses in 2018, demonstrating an escalation of violent acts and abuses. Out of the 163 cases, the police were responsible for 87 violations (53%), and a total of 69 (42%) TV journalists were affected followed by 41 (25%) for print media, 40 (25%) for radio, and 13 (8%) online journalists.[27]

In 2019, police raided three commercial radio stations to interrupt interviews with an opposition leader, and the media regulator also ordered outlets to "suspend" a total of 39 reporters and producers for reporting about an opposition politician's arrest.[28]

The data garnered from media outlets during the quantitative survey yielded extremely concerning truths about the digital and physical risks faced by

Figure 6: Quantitative survey responses regarding laws, policies and regulations that protect journalists

Are you aware of a law, policy or regulation in Uganda that protects the security of journalists and media professionals?

Prefer Not to Say 2%

No / Not Aware 8%

Yes 77 90%

journalists, as well as the practice of self-censorship. Only 1% of respondents believed that journalists are never at any digital or physical risk, while approximately 98% of respondents believe that journalists are always, regularly or sometimes at risk digitally and physically. This corresponds to the high percentage of respondents who believe journalists practice self-censorship: Always (24%); regularly (16%); and sometimes (52%). Regarding the practice of self-censorship, Robert Sempala of Human Rights Network for Journalists – Uganda (HRNJ-U) states that "In terms of social accountability and oversight media is doing badly for fear of reprisals from the state. So many have chosen to trade cautiously rather than doing oversight and watchdog role."[29]

While most respondents shied away from talking about matters pertaining to security over the phone during the quantitative survey, in-person KIIs strongly noted that greater legal protections are needed to ensure the physical and digital safety and security of journalists and media professionals in general. Despite the growing risk that journalists face, 80% of media stakeholders surveyed by UNESCO said that media organizations in Uganda did not have policies to protect the health and safety of their workers amidst government threats and harassment (UNESCO, 2018).

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[27] Human Rights Network for Journalists-Uganda, "Press Freedom index Report - 2018 Uganda: Impunity A Cry for Media Freedom," 2018.
[28] A. Fiedler, M. Meyen, "Information, Education, Participation: Media Use among Youth in Uganda," DW Akademie, 2016.
[29] Interview conducted with Robert Sempala of Human Rights Network for Journalists – Uganda (HRNJ-U)

Figure 7: Quantitative survey responses regarding risks faced by journalists on the job

Believe journalists are digitally at risk

- Never, 1, 1%
- Prefer Not to Say, 1, 1%
- Regularly, 17, 20%
- Always, 29, 34%
- Sometimes, 38, 44%

Believe journalist practice self-censorship

- Prefer Not to Say 4%
- Never 4%
- Regularly 14 16%
- Always 24%
- Sometimes 52%

Believe journalists are physically at risk

- Never, 1, 1%
- Sometimes, 32, 37%
- Regularly, 24, 28%
- Always, 29, 34%
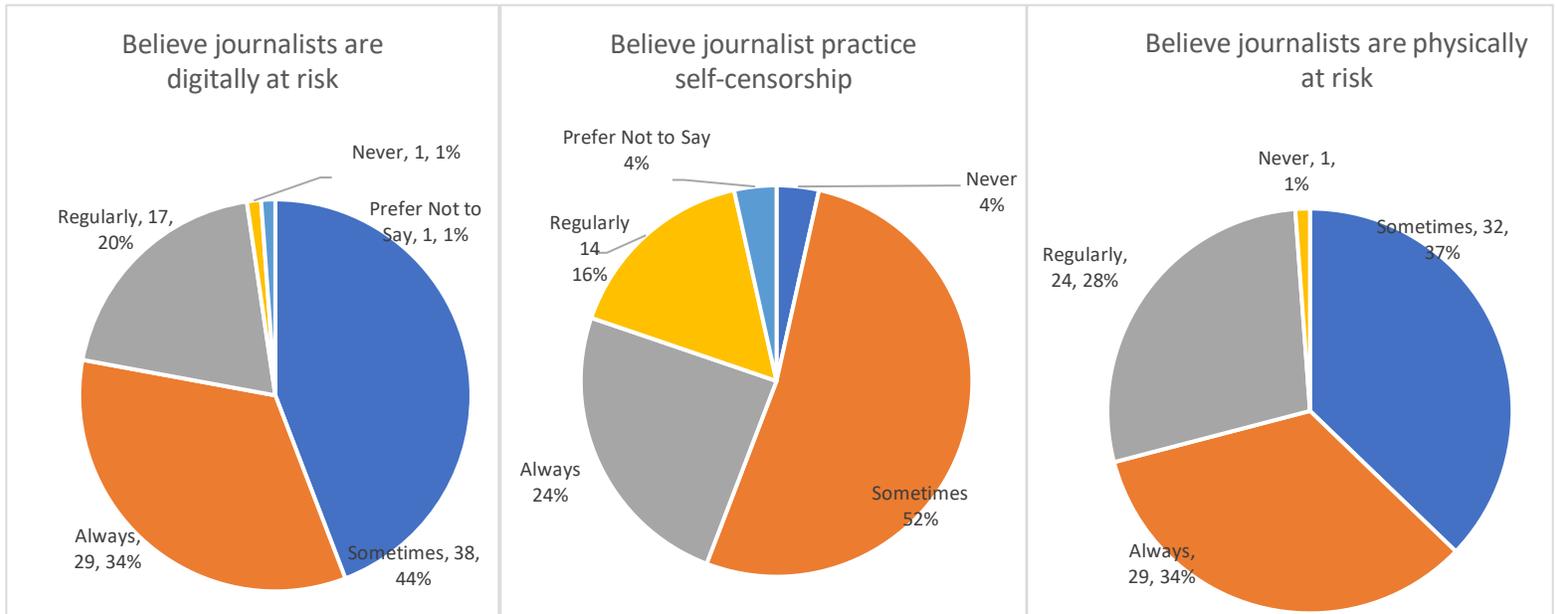
While some stations reported to have received 1 or 2 pairs of press helmets and flak vests with body armor from NGOs, typically most stations did not have this type of safety equipment. Most station managers, particularly during in-person station visits in the southwest region, cited an urgent need for physical security training for their staff.

Uganda National Mechanism for the Safety of Journalists

Uganda media stakeholders agreed on a National Coordination Committee for Safety of Journalists at a conference in April 2018. The committee brings together different media actors to work together and create synergy, in their efforts to protect journalists from danger, prevent crimes committed against them, support and advocate for the prosecution of the perpetrators of crimes against journalists.

The National Coordination Committee was entrusted to ensure a more coordinated approach for raising awareness on issues affecting journalists, promoting broad representation across the country, and building the capacity for journalists. Other recommendations included: training investigators from the relevant arms of the government, building media and information literacy programmes for citizens, promoting a better working relationship between the media and the security organs, and a more coordinated approach in monitoring and reporting media rights' violations.

Source: UNESCO, "Uganda Media Stakeholders establish a National Coordination Committee for Safety of Journalists,"

The physical and digital risks faced by journalists and media houses combined with the lack of policies on the safety of journalists in media organizations has resulted in both self-censorship and often an apolitical writing style employed by journalists to protect

themselves. The media environment appears to be given a certain latitude from government authorities to carry out their work with limited ability to question existing socio-political structures. In a study (2020) published in the *International Journal of Communication* about the perception of press freedom in Uganda, journalists "do not clearly define the media landscape as free or not free; instead, they identify areas—particularly surrounding the president—in which they are not able to write critically."[30] This perceived freedom, however, is not always clear and regularly results in a heavy-handed response from authorities further restricting their operating environment.

The Radio Sector

Across the 14 defined UCC broadcasting regions, there are 309 licensed FM stations.[31] Radio remains the dominant medium of information for both women and men across Uganda. 78% of individuals said they listened to the radio according to the National Information Technology Survey, with 59% of women and 70% of men claiming to listen to the radio at least once a week.[32]

Figure 8: Quantitative survey participants reported annual operating budget and audience size

Total estimated annual operating budget

1% 7% 18% 30% 14% 12% 2% 16%

Legend:
- Less than 10 million
- 10M - 50M
- 50M - 100M
- 100M - 250M
- 250M - 500M
- 500M - 1 Billion
- Greater than 1 Billion
- Prefer Not to Say / Don't Know

Estimated Audience Size

3% 4% 8% 4% 9% 14% 38% 20%

Legend:
- Less than 9,999
- 10,000-49,999
- 50,000 - 99,9999
- 100,000 - 499,999
- 500,000 - 999,9999
- 1,000,000 - 4,999,999
- Greater than 5,000,0000
- Don't Know

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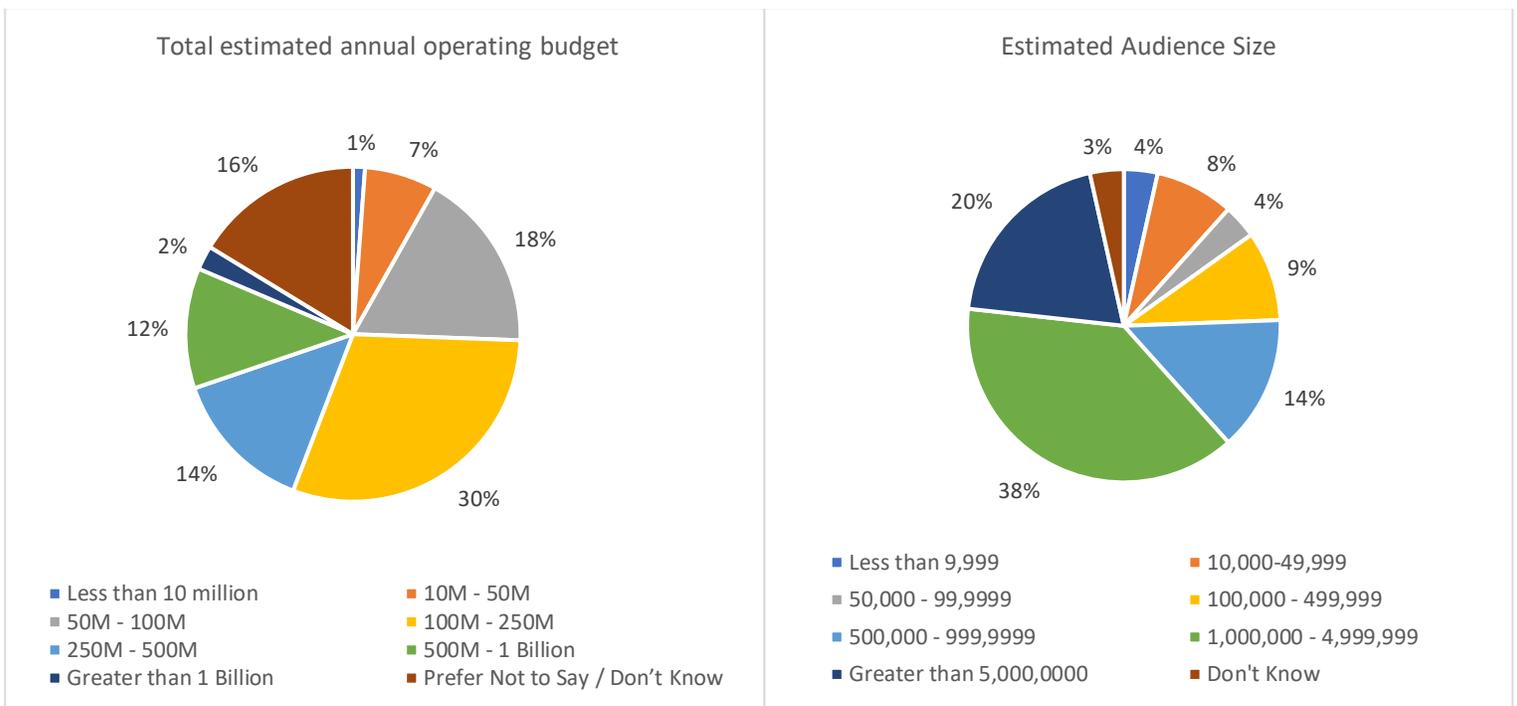
[30] Cohen, Meghan and McIntyre, Karen, "The State of Press Freedom in Uganda," International Journal of Communication 14 (2020), 649–668.

[31] Minister of Information, Communications Technology and National Guidance, "Presentation by the Minister of ICT and National Guidance to Parliament on The Census of FM Radio Stations in Uganda," 12 May 2020.

[32] Uganda Bureau of Statistics, "Uganda Demographic and Health Survey (UDHS), 2016." January 2018; Men are more likely (10%) than women (5%) to access all three forms of media (newspaper, television, and radio) on a weekly basis (Figure 3.4). Slightly more than one third (35%) of women and nearly one quarter (24%) of men do not access any of the three media on a weekly basis.

Radio stations in Uganda vary greatly by size, ownership, and financial models. Apart from the government-owned Uganda Broadcasting Corporation, radio stations in Uganda are owned by a range of actors, including religious organizations and leaders, NGOs, businessmen, communities, and increasingly politicians.[33] The majority of organizations surveyed (26 of 86), have an operating budget of 100M - 250M Uganda Shillings, whereas only 2 organizations stated that their annual operating budget was over 1 Billion Uganda Shillings.

In 2020, there was a noticeable trend of radio stations going off-air and/or closing due to non-compliance. From the in-person visit to the central and south-west regions, there seemed to be a least one to two radio stations in each district that were not currently broadcasting, including but not limited to Radio Equator (Masaka), Greater Afrikan Radio (Mbarara), Bwera Community Radio (Kasese), Platinum Radio (Kasese), and Gold FM (Fort Portal).

Public Sector Broadcasting

Uganda's National Broadcasting Policy (2004) defines public broadcasting as "a system of broadcasting that is accountable to the public, and operated on a non-profit basis in order to meet the full range of public information needs in the overall public interest." The Uganda Broadcasting Corporation (UBC) is owned and controlled by the government, which merged Radio Uganda and Uganda Television under the UBC Act (2005). The Act was envisioned to transform the state broadcaster into "a viable, independent, professionally-run public broadcaster accountable to the public to ensure efficiency and quality programming."

UBC Radio is the corporation's national service and seeks to "inform, educate, guide and entertain the public through maintaining a sustainable national coverage." UBC also operates local and regional stations: Buruli FM (central), Butebo FM (east), Magic 100 FM (Kampala), Mega FM (north), Ngeya FM (west), Star FM (Kampala), UBC West (west), Voice of Bundibugyo (west) and West Nile FM (northwest).[34]

Voice of Bundibugyo presenter laughs with her audience, Voice of Bundibugyo is a part of the government managed and operated network of radio stations under UBC. Unlike most stations, VoB maintains a gender balanced staff (Credit Internews, 2020).

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[33] Development Research and Social Policy Centre Ltd, "The Uganda Communications Commission's 2nd National Electronic Media Performance Study (2012): Eastern and Northern Uganda regions," January 2013.

[34] George W. Lugalambi (Ph.D) and Bernard Tabaire, "Overview of the Media State of Media Freedom in Uganda: A Research Report," ACME, 2010. http://acme-ug.org/wpcontent/uploads/Research-Report-on-State-of-Media-Freedom-in-Uganda.pdf

Community Radio

During the qualitative interviews, many privately owned stations claimed to be community stations because of their presence within rural communities. Community radio stations in Uganda, historically, however, have operated under a different license, and are thus legally distinct from private, commercially oriented radio stations. In 2019, the UCC changed their policy toward those with community radio station licenses, and as detailed above have mandated that community radio stations now pay an annual licensing fee.[35] This has caused many community radio stations to reconsider their current registration with UCC, and transition to a privately held license.

Overall, there is little literature about community radio stations in Uganda, largely because community radio represents an insignificant percentage of the sector. In Uganda, there were initially three community radios: 1) Apac FM, 2) Kagadi-Kibale Community Radio, which was founded by the Uganda Rural Development Trust, and 3) Mama FM, which is owned by the Uganda Media Women Association. UNESCO promoted the concept of community radio in Uganda by strengthening and reinforcing human and institutional capacities through its project on Empowering Local Radios with ICTs and supported the establishment of the Community Media Network of Uganda (COMNETU) in April 2013. While the activeness of the network has wavered over the years, other community radios, such as Buwama FM, Nabweru Tiger FM, Nakaseke CMC FM, Oyam FM, and Ngora CMC FM have joined the network.[36]

Given the non-profit status of community radio stations, many of them survive on small donations and local advertising revenue and are largely dependent on grant-based funding or in-kind contributions of radio station equipment.

A community volunteer radio presenter broadcasting the morning program at Radio Buwama Community Radio Station in Mpigi District (Credit Internews, 2020).

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[35] One community radio station stated that UCC was requiring a five-year upfront payment.

[36] Goretti Linda Nassanga and William Tayeebwa, "Assessment of Media Development in Uganda: Based on UNESCO's Media Development Indicators," UNESCO, 2018.

As a part of this assessment, Internews visited Radio Buwama in Mpigi District. The community owned radio holds elections every 5 years across the 10 parishes of Buwama sub-country. Currently, the 25 presenters (17M and 8F) that operate the station 24/7 are all volunteers.

Content Production and Broadcasting

During the quantitative survey and the in-person visits to radio stations, overall radio station staff were not well versed to speak about their programming. The core purpose of a radio station is the very content which that radio station broadcasts and thus makes it unique from any other station. Many radio stations were not able to describe their programming strengths, articulate their weekly program lineup, or provide basic data on the number of new programming,

"Journalism in Uganda is event based… most content is sex and politics and there is no development information… only 30% of people's information needs are being met." She adds that most privately owned media organizations only "aim at meeting superficial needs"

Margaret Sentamu, Uganda Media Women's Association

repeated or re-broadcasted content or the hours of music broadcast per week. It must be assumed that most radio stations in Uganda are not analyzing or do not have the systems to analyze their content and programming.

Media in Uganda is highly commercialized with the content largely geared toward advertising and event-based content, and overall lacking depth and critical analysis. During the KIIs, nearly all respondents expressed a need for greater in-depth and investigative journalism that engaged sources and used information to tell better stories.

A major factor contributing to poor content production is the lack of skills and knowledge of most journalists across the profession. Abbas Mpindi from the Media Challenge Initiative stated that "the quality of the content that comes from Ugandan media houses is heavily undermined by the low caliber of journalists … [and] they lack data journalism and fact checking skills." Journalists need to provide better independent and professional reporting, as well as focus on and exhibit greater knowledge about real issues that shape the public narrative, such as health, education, agriculture, and the environment.

In general, radio stations stressed the popularity of their morning and evening programs, strong current affairs shows, their emphasis on educational content, as well as broadcasting in multiple languages. Of the survey respondents, the four most popular languages that were broadcasted across the airwaves included English, Luganda, Runyankole-Rukiga, and Swahili. Radio stations also emphasized the importance of sport programs, as well as the live coverage of international sporting events, as a critical element to gaining both audience share and sources of advertising.

Results from the quantitative survey revealed that local news updates, politics and government, music, sports, and health represent the largest share of stations' weekly programming.[37]

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[37] Note that in the quantitative survey there was not a specific category for religion, which was added by respondents

Figure 9: Programming priorities of radio stations (quantitative survey)

Largest percentage of your weekly programming
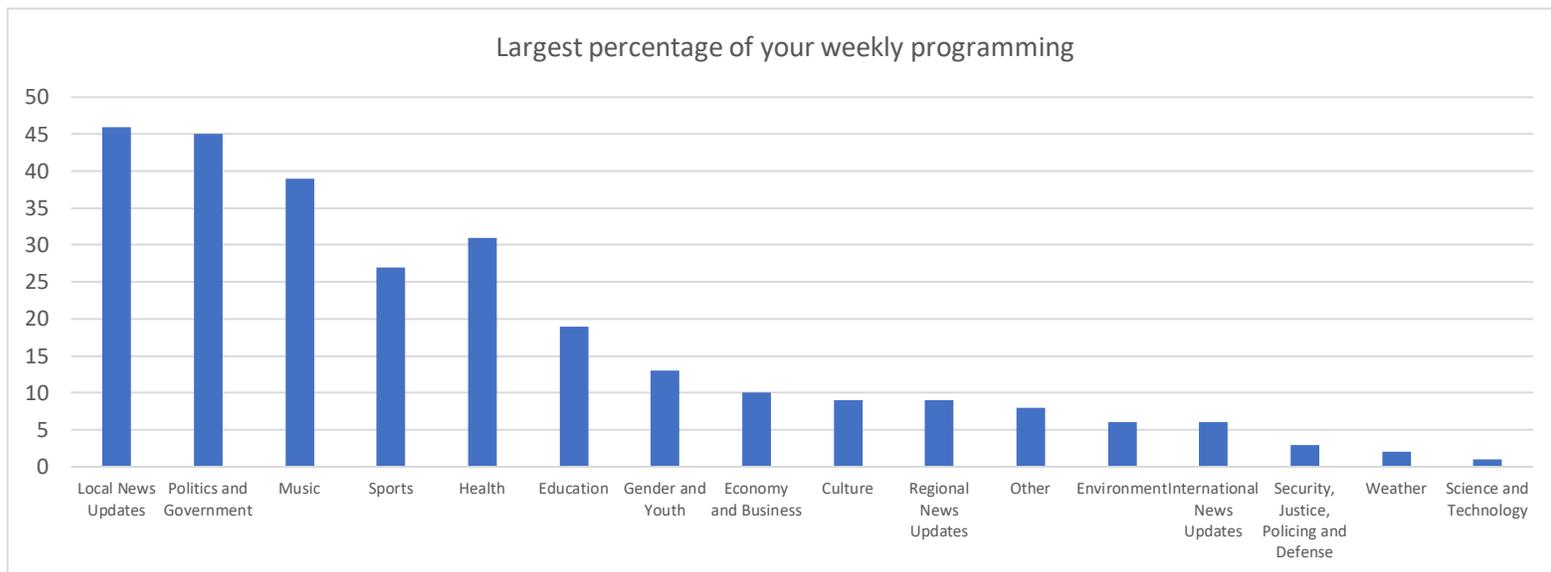
Internet and Social Media

While the Internet may be a critical tool through which people can access and share information, there remains a huge digital divide in Uganda. Overall, 4 in every 10 persons (43%) cited a lack of confidence, knowledge or skills as the major reason for not using the internet, followed by those that stated that they did not need the internet (18%) and the cost of equipment was too high (17%).[38] Men are more than twice as likely as women (23% versus 9%) to have used the Internet in the past 12 months,[39] and in the most recent Uganda National Household Survey 2016/2017, 37% of communities reported that the internet access point was more than 8 kilometers from the village center, and only 3% of households reported to individually own a computer/laptop.[40]

Given low national internet usage levels, stations greatly varied on the degree of their social media presence.[41] Nearly all stations have Facebook pages, but they varied on their usage of Twitter and maintaining websites. Only a few stations reported having Instagram pages. Live streaming on Facebook was cited as very important for audience engagement, despite stations low level of knowledge and limited access to proper audio-video convergence technologies for live broadcasting on social media. Regardless if stations were currently live streaming or had plans to stream online in the future, all stations wanted to increase their capacity and technical know-how in this area.

Social media presents great opportunities in terms of connecting with audiences and sources, as well as providing a new and growing revenue stream. There is a need to equip journalists with digital skills and media houses should establish social media desks to develop tailored content for social media. Dr. Monica Chibita of Uganda Christian

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[38] Uganda Bureau of Statistics, "Uganda National Household Survey 2016/2017," 2018.

[39] Uganda Bureau of Statistics, "Uganda Demographic and Health Survey (UDHS), 2016." January 2018.

[40] Uganda Bureau of Statistics, "Uganda National Household Survey 2016/2017," 2018.

[41] Overall, 9% of women and 23% of men age 15-49 have used the Internet in the past 12 months; Uganda Bureau of Statistics, "Uganda Demographic and Health Survey (UDHS), 2016." January 2018.

University stated that the media must be able to "develop high quality online content which is attractive to online audiences." While online and social media are being used in Uganda to generate income, most media houses are still learning to commercialize on these platforms.

If social media content development is viewed as an add-on to a journalist's existing role, poorly fact-checked and presented stories will flood social media, continuing to frame this channel as an informal and untrustworthy source of news.

Advertising and Ratings

Whether from community announcements or business enterprises, many radio stations derive their revenue from advertising. Of the 72 organizations that shared the percentage of their revenue that comes from advertising, only 4 organizations have less than 10% of their revenue coming from advertising. Thus, Ugandan radio stations are highly dependent upon advertising, which is largely collected from businesses through selling airtime.

Radio stations are struggling to maintain their market share as the space becomes increasingly crowded, and competition to both retain and win new advertisers becomes increasingly difficult. To be financially sustainable, radio stations must diversify their advertising, innovate, and embrace technologies, such as high-quality mobile and online content. Mobile and online content production and information consumption is a relatively new and high growth market in Uganda. While some radio stations are attracting audiences in urban and peri-urban areas through digital content and targeting tech savvy information consumers, particularly youth, this market will continue to expand, particularly in rural areas and among wider socio-economic demographics. Despite the overall low levels of internet penetration in Uganda, it is critical for radio stations to build this expertise and position themselves to expand and diversify their advertiser base.

Though some radio stations may need training and mentoring to strengthen their advertising and marketing strategies, Uganda has demonstrated that there is a significant culture of advertising revenue to financially sustain radio stations. This can be one explanation in regard to why there is a lack of grant-based funding for media outlets.

While some faith-based stations may claim to be independent from the church, evidence shows that they do receive a significant portion of their revenue from direct contributions from the church. This represents a critical source of revenue for these stations because in many cases the church limits what type of advertising revenue is allowable based on their core beliefs.

For the UBC radio stations, on the other hand, money collected from advertising and other sources of income goes directly into the Central UBC Kampala account and then UBC allocates funds to the stations accordingly.

Given how critical advertising revenue in Uganda is for radio stations, media outlets frequently use third-party vendors to support their marketing efforts and collect audience related data. During the quantitative survey, 61 stations (71%) reported using a broker/agent to support advertising and marketing, and 74 organizations (86%) publish their rate card.

Audience research is widely used among media outlets in Uganda, with 88% of survey respondents reporting use of audience research. Radio stations claimed to conduct both their own audience research as well as utilize third-party vendors. Of the 45 organizations paying for third-party vendors to conduct audience research, 24 (53%) utilize the services of Ipsos/Synovate. A few organizations also cited using an innovative and rapidly growing company focused on audience research and media monitoring in East Africa called Reelforge.[42]

According to GeoPoll's Audience share measurement between July 2017 - March 2018, Uganda's Top 5 Radio Stations are Capital FM, Bukedde FM, Radio West, NBS FM, and Radio Simba. Capital maintained 10-11% audience share, while Bukedde FM, Radio West, NBS FM, and Radio Simba each maintained between 3-4%.[43]

Figure 10: Radio Station Ratings by Region, GeoPoll 2018

North			Mid East			Central		
Mega FM	20%		Etop FM	22%		Capital FM	11%	
Capital FM	16%		Capital FM	14%		Radio Simba	8%	
Radio Rupiny	10%		Voice of Tesco FM	12%		Galaxy FM	8%	
Southern Eastern			**Mid North**			**Eastern**		
NBS FM	17%		Voice of Lango FM	19%		Capital FM	19%	
Basoga Baino FM	15%		Unity FM	14%		OPG FM	19%	
Smart FM	11%		Divine FM	10%		Akaboozi FM	8%	
South West A			**North Eastern**			**Western**		
Voice of Toro FM	11%		Karibu FM	39%		Radio Maria	13%	
Endigito Radio	10%		Nenah FM	9%		Radio Kitara	11%	
Capital FM	10%		Step FM	8%				
South West B			**North Western**					
Radio West	17%		Radio Pacis	17%				
Vision Radio	11%		Arua One FM	11%				
Capital FM	10%		Pakwach FM	11%				

Gender and Work Environment

Reporters are poorly paid and operate under poor working conditions in Uganda. During KIIs, many noted how low pay combined with an informal work status contributes to not only poor reporting, but also leads journalists to adopt unethical practices and "employ wit to survive."[44] Politicians and businesses easily compromise journalists, offering payment and gifts in exchange for coverage and favorable reporting.

This assessment noted that discussing the contractual arrangement that media outlets have with their staff is an extremely sensitive issue, as journalists are not only often under paid but largely work informally with little legal rights and protections. The data from the quantitative survey revealed that it is still a very informal sector with 5 (6%) organizations

[42] Reelforge, https://www.reelforge.com/reelforge/site/index.php

[43] GeoPoll, "Uganda Quarter 1 2018: Radio & TV Audience Ratings Report," 2018.

[44] Ofwono Opondo, "The Safety of Journalists is Critical for Development," Uganda Media Centre, November 11, 2018, https://www.mediacentre.go.ug/Opinion/safety-journalists-critical-development

stating that staff are on oral agreements and 23 (27%) organizations stating that staff are on both written and oral agreements. Similarly, UNESCO's media development assessment found deep dissatisfaction among journalists when asked about the level of satisfaction with their salaries and job security in general. The overall majority (80%) said they were not satisfied with their salaries, with only 20% claiming to be satisfied. [45]

"Media is male dominated at all levels"

UCC Regulator

The media sector in Uganda is dominated by males at all levels. For example, over 74 (86%) of the quantitative survey respondents were male, and during the KIIs only three female owned radio stations were referenced: Challenge FM; Radio One and Radio Akaboozi (owned by Maria Kiwanuka); and 101.7 Mama FM (owned by Uganda Media Women's Association).

This assessment asked extensive questions about the number of female staff in both full-time and part-time capacities, as well as media and journalism roles. Respondents often admitted large gender disparities within their organizations, which was reflective of the overall percentage of males who participated in the quantitative survey. However, the gender data collected during both the in-person KIIs and quantitative survey could not be used to accurately demonstrate the extent of the gender gap in the media sector. This assessment noted that respondents were largely not candid about their workplace practices when disclosing information about gender-based employment practices.

The Ntinda-based radio station Digida FM 106.5, which was absorbed by Budu FM based out of Masaka in April 2020, makes a push to recruit more women.

Margaret Sentamu of the Uganda Media Women's Association, states that "Media in Uganda is 80% male dominated in terms of ownership, management and content. The language is sexist and favors men's mental stereotypes. There are more pictures of men while women's photos portray them as sex objects. 75% of the stories are written by men and most Talk-shows are hosted by men and 7 out of 8 panelists are men." [46]

These reflections were largely echoed by Lydia Namubiru of Open Media, "All influential reporters are male, newsroom senior managers are male, sources are mainly male (80%). Women come in at mid-level management. Content is blind to women issues except when discussing maternal health or scandals. This marginalization of women has a historical context and is deeply rooted in the societal view of the role of women. This is also transferred to the newsroom. Newsrooms make little effort to be inclusive." [47]

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[45] Goretti Linda Nassanga and William Tayeebwa, "Assessment of Media Development in Uganda: Based on UNESCO's Media Development Indicators," UNESCO, 2018
[46] Interview with Margaret Sentamu, November 2020.
[47] Interview with Lydia Namubiru, November 2020.

Equipment and Infrastructure

Physical visits to stations, particularly those that are small to medium size, demonstrated a general lack of investment or ability to maintain and upgrade studio and production equipment. This can be due to a host of factors, including the initial procurement of low quality or second-hand equipment, owners, and managers unwillingness to re-invest in the station, a lack of revenue to afford quality radio equipment, and minimal knowledge of the specifications and vendors to source production and studio equipment.

Crooze FM's management has invested in innovation and technology across the organization from field reporting to the studio. This investment has contributed to the organization's large listenership and popularity among advertisers. (Credit Internews, 2020).

Power: While most stations have access to the electrical grid, nearly all stations have a hybrid power system and cannot solely rely upon grid-based electricity. Load shedding is a common practice in Uganda, and some stations report the need to run a generator as a result for up to 5 hours per day. This is very expensive, and thus many stations need new and higher capacity generators but are also interested in exploring other alternative sources of energy, such as uses of PV solar power.

Nearly all stations stated the need for field recorders and live field-broadcasting equipment, audio-visual equipment for live online streaming, to upgrade their current mixer/sound console, and have spare or back-up equipment, particularly studio transmission links (STLs). Due to the terrain in Uganda and limited space in urban

centers, it is quite common that radio stations have their masts located in a different location from their studios, and thus many radio outlets utilize STLs. Additionally, given the physical security concern mentioned by most journalists, stations commonly requested for press helmets and flak vests with body armor.

Transportation limitations – both the cost of hiring bodas (motorbikes) and access to affordable and convenient transportations in general- appears to be a common limitation for conducting fieldwork and engaging with communities. Many stations thus expressed that the procurement of a boda, particularly given its low cost and ability to traverse unpaved terrain, would increase their production of content and ability to generate advertising revenue.

Journalists Associations

This assessment found high membership in journalist associations in Uganda, with 76% of survey respondents stating that they belonged to a journalist or media association. This finding is in stark contrast to data collected during UNESCOs media development assessment in 2013. UNESCOs assessment asked journalists if they belonged to any trade unions or the National Institute for Journalists of Uganda (NIJU), and whether in the past year, they had paid membership fees: 85% said they did not belong to any trade unions compared to 15% who did, [and] nine out of ten journalists who participated in the study said that they did not belong to any journalist organizations, stating that they did not see any benefit in doing so.[48]

The major associations that members stated they belonged to included:

- Community Media Network of Uganda (COMNETU)
- Human Rights Network for Journalists-Uganda.
- National Association of Broadcasters
- Rural Broadcast Association
- Uganda Broadcaster Association
- Uganda Journalist Association
- Uganda Media Women's Association
- Uganda Media Owner's Association
- Regional and District-level Associations, including but not limited to: Western Uganda Journalists Association (WUJA), Toro Media Practitioners Association (TOMPA) Greater Bushenyi Media Association, Northern Uganda Media Club

Despite the high rate of journalist association membership reported by survey respondents, it is neither active nor strategic. The media sector in Uganda is disorganized and there is no strong lobby group advocating for the rights, safety, and security of journalists. As is very similar across many sectors in Uganda, there are too many membership-based media associations both at state and national levels with overlapping agendas. The Community Media Network, HJRN, Uganda Journalists Safety Committee

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[48] Goretti Linda Nassanga and William Tayeebwa, "Assessment of Media Development in Uganda: Based on UNESCO's Media Development Indicators," UNESCO, 2018.
https://books.google.co.ug/books?id=wWN2DwAAQBAJ&printsec=frontcover&source=gbs_ge_summary_r&cad=0#v=onepage&q&f=false

and Uganda Human Rights Commission are all individually advocating for policies that ensure an enabling environment for media and journalists.

Coordination and advocacy bodies in the media sector would greatly benefit from a consolidation, who would then be able to engage its members more effectively, and better represent the sector by adopting a more unified and common approach to engaging government.

10 Years Later: The Sustainability of Internews Training in Northern Uganda and the Northern Uganda Media Center (NUMEC)

- NUMEC was established by journalists working in then war-torn Northern Uganda in the late 90s, and formally registered in September 2009.
- Moses Odokonyero, the Coordinator of NUMEC noted that "Internews was the first organization to conduct media training in Northern Uganda, and what made the Internews training quite unique was the practical element. Apart from a few radio stations in the region, only Internews ran a professional production studio in Northern Uganda, which was handed over to NUMEC."
- "The Internews-trained journalists have continued to exhibit high standards of professionalism and uphold ethical values of the profession, which has accelerated their professional growth in the sector," added Moses. Those holding key positions include: Peter Labeja (Program Manager-Radio Rupiny), Nicky Afaya (Radio Rupiny), Bill Okech and Sam Lawino (both of Daily Monitor, Lira Bureau), Catherine Akello and Juma Jaime (both of Mega FM), and Moses Odokonyero (Coordinator NUMEC and Staff Writer at Daily Monitor).
- NUMEC has been utilizing the production studio and field reporting equipment to produce content on justice and reconciliation programs as a means of generating income for the Center and has been vital in the formation of West Nile Journalists' Association.
- NUMEC looks forward to continue to strengthen their management structures, build skills and knowledge on emerging technologies, and strengthen their technical reporting skills in areas such as climate change, humanitarian reporting, conflict sensitive journalism and cross-border reporting.

Quality Standards and Training

There are numerous educational and work-related opportunities available for journalists and media professionals in Uganda, but the quality of the training greatly varies and does not always align to the needs of media houses and the sector in general. Moreover, the findings from this assessment support earlier findings that organizations also do not make enough of a financial commitment and time investment to train staff.

Academic and Technical Training Opportunities

From the data gathered throughout this assessment, it appears that most academic and technical schools across Uganda, offer some form of media or journalism course. This has unfortunately created varying standards in the instruction of journalism and media. Many media outlets complain that recent graduates are not provided with practical hands-on experience during their studies, and overall, there is a misalignment with the training needs required by the market and the instruction that is being provided in academic and technical institutions.

Makerere University started a Mass Communication course in 1988 to professionalize journalism and communication in the country, and in 2004, the Department started a Master's programme in Journalism and Communication. Other popular institutions include Uganda Christian University, Kampala International University, Islamic University in Uganda, Uganda Martyrs University Nkozi and Nkumba University, Cavendish University which offer courses such as News Writing; Broadcasting; Photo Journalism; Newspaper Editing; Essentials of Public Relations; Mass Communication Theory; Media and Society; History of the Media; Development Communication; Media Ethics; Public Affairs Reporting; Media Law; and Communication Research Methods. Additionally, there are technical schools like the United Media Consultants and Trainers (UMCAT) and the International Institute of Business and Media Studies (IBMS).

UNESCO surveyed journalists about their level of satisfaction with their educational training, in terms of whether it enabled them to perform their work competently. Half of them (49%) admitted to not being satisfied, while 48% said the training was relevant and helped them perform their work competently. [49]

Workplace Training

During the KIIs, many radio station interviewees reported that they do not offer internal or external trainings at their outlet. One radio station manager stated that big media houses were plucking the talented and trained staff from smaller media houses, and thus investing in staff training always resulted in a 'lost investment.'

The most cited training providers referenced during the on-site visit to radio stations were ACME, the Media Challenge Initiative, and the Uganda Radio Network (URN), who provides quarterly trainings as a part of station's subscription package. Many stations receive thematic-based trainings from technical experts from NGOs and local government, particularly in the areas of agriculture, health, and conflict sensitive reporting (e.g. Rwenzori Forum for Peace and Justice, UHRJN). Stations also rely on academic institutions within their districts to provide training opportunities to staff, and referenced Liberty College, Mountains of the Moon, and Nkozi University.

While thematic based training from NGOs provides many media houses with free technical and subject matter training, these organizations also have an interest to get their agendas broadcast. Many of the media houses are dependent on

> "Uganda is full of copying and pasting, we need to train journalist on how to interview, collect information, conduct research, and make research more consumable to audiences."
>
> *-Brian Kizito, Buyama 90.9 FM, Lyantonde*

these NGOs for these services largely because there is limited funding for media development. Most NGOs, however, do not have the capacity to properly train journalists to meet the information needs of the public through in-depth, balanced, and fact-checked reporting.

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[49] Goretti Linda Nassanga and William Tayeebwa, "Assessment of Media Development in Uganda: Based on UNESCO's Media Development Indicators," UNESCO, 2018.

The training needs that were reported during the in-person visits validated the findings from the quantitative survey with stations reporting a need to improve presentation skills, field, and thematic based reporting. During the KIIs, an increased emphasis was placed on the need to improve knowledge, practice, and understanding of journalist physical and digital security, media law, and soft-skills like customer-care.

When asked to elect the top three training needs that your establishment would be most interested in receiving in the areas of Management, Operation, and Administration, respondents unanimously stated Sales, Marketing and Advertising (79%), and Leadership and Strategic Planning (60%).

Figure 11: Management, operation, and administration training needs of radio stations (quantitative survey)
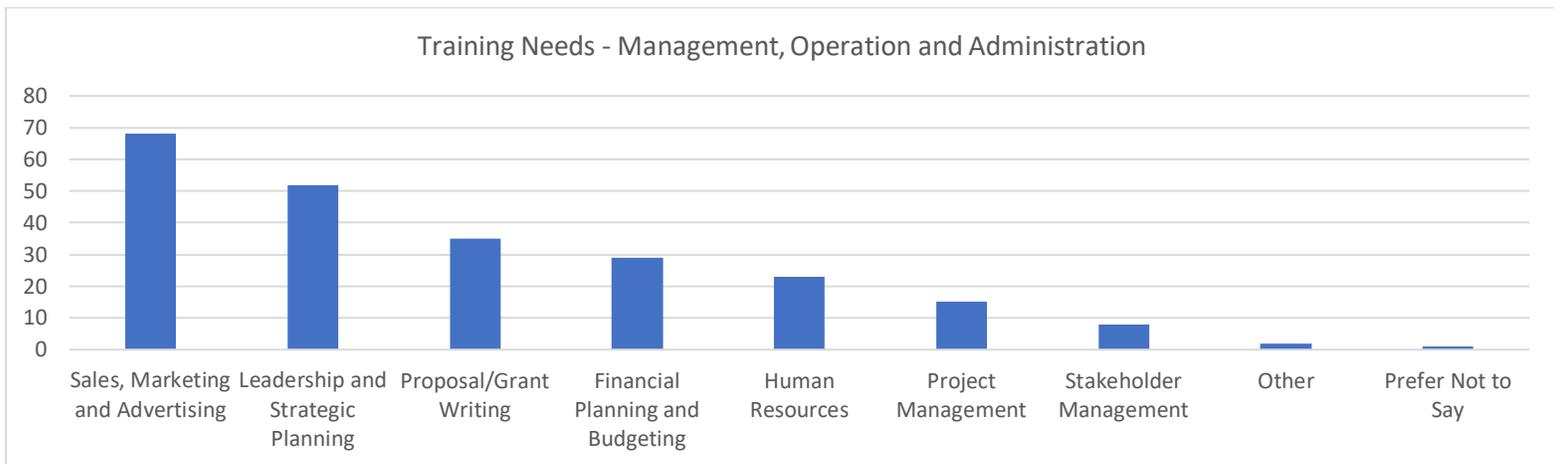
When asked to select the top three training needs that your establishment would be most interested in receiving in the areas of Media and Journalism, respondents stated: Investigative Journalism (60%), followed by Thematic Reporting (49%) and Social Media Production (40%).

Figure 12: Media and journalism training needs of radio stations (quantitative survey)
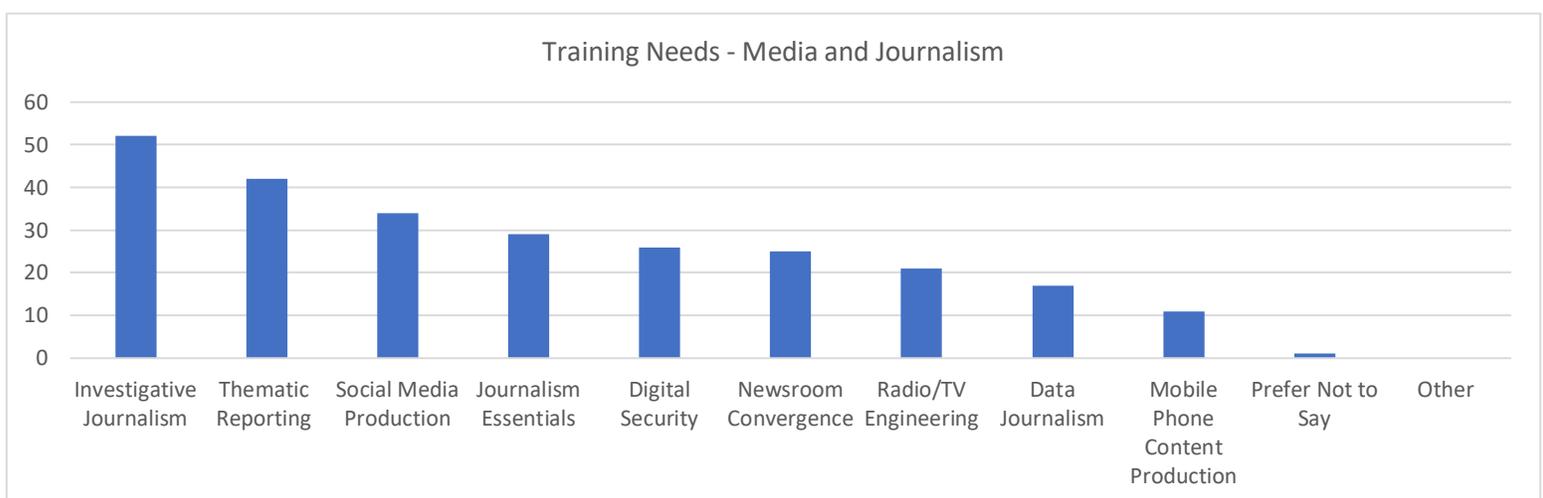
Financial Health, Coronavirus and 2021

Media outlets in Uganda are not diversified financially, and largely their revenue is derived from advertising from businesses. It is interesting to note, for example, that only 14% of media outlets surveyed have taken out a loan from a financial institution in the last 3 years. Additionally, despite the enormous development and humanitarian funding in Uganda, only 15% of outlets stated to have received grant-based funding in the last 3 years, with few organizations being able to reference institutions in Uganda that would even financially support media.

Therefore, as a sector that is largely propped up by advertising revenue generated from business alone, the media sector was disproportionately affected by the COVID-19 pandemic. This demonstrated the lack of overall resilience by the sector and the difficulty to recover and bounce back from this shock.

Figure 13: Quantitative survey respondents' level of satisfaction with COVID-19 mitigation measures

Satisfaction level with government measures designed to mitigate the impact of the Covid19 on your business

- Prefer Not to Say 1%
- Highly Disastified 5%
- Neither satisfied nor dissatisfied 10%
- High Satisfied 5%
- Satisfied 44%
- Disastified 35%

Despite the losses faced by the media sector, when asked about the level of satisfaction with the government measures designed to mitigate the impact of COVID-19 on their business enterprises, the responses were nearly balanced between those that were highly satisfied vs. highly dissatisfied and dissatisfied vs. satisfied.

While COVID-19 generally presented financial difficulties for media outlets, for listeners, radio remained an invaluable information source and cemented the media's position as an essential service provider. Since the outbreak of the pandemic, media- and radio in particular- remained one of the only effective avenues to reach the public. The Ugandan government even acknowledged media as an essential service provider, and greatly relied upon this platform to provide vital information about COVID-19 to the public. Radio stations not only offered a platform for informing the public about preventative and response measures, but also offered a platform for public engagement and debate.[50]

In a study (2020) on the effect of COVID-19 on media listenership, GeoPoll found that the leading information source for Ugandans was radio at 44%, TV was the second most common information source at 34%, and social media at 20%.[51] Despite fewer vehicles on the road, radio also registered an increase in the average listenership base in Kampala

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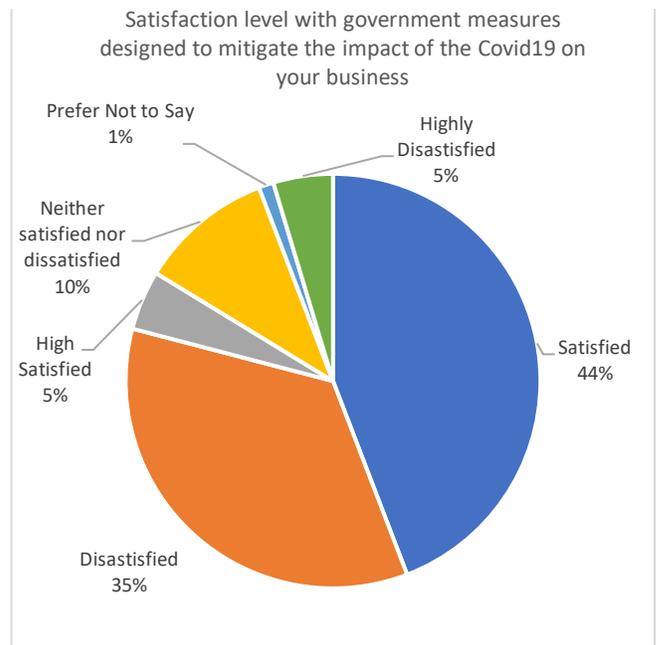
[50] Christopher Krafft, "Journalism Without Fear: On the occasion of World Press Freedom Day,", U.S. Mission Uganda, May 3, 2020, https://ug.usembassy.gov/journalism-without-fear-an-op-ed-by-charge-daffaires-christopher-krafft-on-the-occasion-of-world-press-freedom-day-may-3-2020/

[51] McCrokclin, Shannon, "Coronavirus in Uganda: Impact on Media Consumption," GeoPoll, May 27, 2020.

during the lockdown period. On average 273,482 radio listeners tuned in from March 1st – 17th, which increased to 343,048 after March 19th.[52]

The following section provides a detailed discussion on how media outlets were financially and programmatically impacted by COVID-19, and as most businesses, what stimulus support the media sector needs to recover.

Financial Impacts of COVID-19 on the Media: Following the initial government lockdown, which spanned late March to early June 2020, media outlets were faced with a host of complex and multi-faceted challenges that not only affected businesses but also impacted their ability to serve and meet the information needs of their audiences.

Figure 14: Main organizational challenges experienced by COVID-19 (quantitative survey)

Reduced cash flow to maintain staff and business operations was cited by 72% of survey respondents as the most overwhelming challenge to radio stations during COVID-19. Like other businesses, operational costs, and the general cost of doing business increased along with staff absenteeism. 31% of respondents (27 out of 86) during the quantitative survey reported a decrease in revenue by between 26 – 50%, with 56% (48) of respondents reporting a decrease in revenue by more than 26%.

During the KIIs, radio stations unanimously reported a decrease in advertising revenue from businesses, which previously represented their largest source of advertising revenue. Many businesses stopped advertising because they either closed or had very limited

Figure 15: What happened to your organization's revenue following the lockdown (quantitative survey)

Revenue Change post March 2020	#	%
Decreased between 26%-50%	27	31%
Decreased by up to 25%	23	27%
Decreased between 51%-75%	15	17%
Decreased 76% or more	7	8%
Increased by up to 25%	5	6%
Increased between 26%-50%	4	5%
Don't Know	3	3%
Prefer Not to Say	1	1%
Remained the same	1	1%

[52] McCrokclin, Shannon, "Coronavirus in Uganda: Impact on Media Consumption," GeoPoll, May 27, 2020.

resources to advertise because of the restrictive COVID-19 measures that for many sectors brought about a complete cessation to business activity. Almost none of the stations interviewed during the in-person site visits stated that their advertising revenues were restored to pre-March levels; however, many stations were hopeful that their revenue levels would be restored in 2021.

"If it was not for the small COVID-19 advertising revenue, we would have been forced to close."

-Radio Station in Kasese

While business-related advertising revenue plummeted, which represented the bulk share of revenue for most stations, many radio stations reportedly received increased levels of advertising from government and NGOs who were broadcasting COVID-19 PSAs and educational-based programming. It is interesting to note, while none of the respondents stated having experienced an increase in revenue during the KIIs, approximately 11% of radio stations surveyed said that they experienced an increase in advertising revenue because of COVID-19. This latter scenario for smaller radio stations who prior to COVID-19 had lower sources of advertising revenue could be completely plausible as COVID-19 presented a range of new clients seeking to broadcast repeated health programs and announcements over a sustained period.

Both the quantitative survey and KIIs demonstrated the grave reality in which COVID-19 affected employment at media outlets. The issue of salary reductions was brought to the public forefront when the majority government-owned Vision Group announced sweeping salary reductions of up to 60% that lasted for over a 6-month period. "Those earning above 19 million UGX got a 60% salary cut. Those earning between 8 million UGX and19 million UGX had a 45% cut while those earning 8 million UGX and below were subjected to a 40% salary cut."[53] While Vision Group has renegotiated contracts or restored original salary levels, there are numerous media professionals across the country who are still working at reduced salary levels and in some cases with no pay.

Data from the quantitative survey demonstrated that 43% of organizations claimed to have dismissed workers and 36% claimed to have reduced staff salaries. These figures may not be fully representative of the truth because survey respondents were hesitant to report this information over the telephone.

Businesses, particularly in the formal sector, had to incorporate COVID-19 standard operating procedures, such as the procurement of personal protective equipment, into their business operations and management in order to continue to operate, particularly if they were going to ensure legal compliance with Uganda's highly regulated 2006 health and safety measures and Employment Act. Faced with difficult financial decisions, many businesses in Uganda were not fully compliant with the Employment Act during this period, and thus discussing employment terminations and salary reductions is a highly sensitive issue.[54]

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[53] Vision Reporter, "COVID-19: Vision staff full salary reinstated," 28th September 2020, https://www.newvision.co.ug/news/1527990/covid-19-vision-staff-salary-reinstated

[54] Legally, according to the Employment Act 2006, employers can force their employee's to take annual leave, however, according to the Act, there are specific procedures for redundancies and an "employer cannot unilaterally change the terms and conditions of an employee's engagement where such a change is detrimental to the employee." Therefore, if an employer

A lonely guard provides shows off the "temporarily" closed Greater Afrikan Radiyo station. This is one of many radio stations that were off air in 2020. Whether for non-compliance with UCC, internal ownership disputes, or financial difficulties, the truth behind why so many stations have temporarily or permanently closed in 2020 is largely unknown. (Credit Internews, 2020).

Programmatic Impacts of COVID-19 on the Media

While many lauded radio stations for their COVID-19 related broadcasts, overall content and production were drastically reduced by the pandemic. Due to a decrease in advertising revenue, many stations had to lay off staff in addition to instituting salary reductions. With fewer staff and a decrease and in some cases a complete cessation of revenue, radio stations were limited in their capacity to collect, generate, and broadcast content. This drastically affected the overall output and performance of the stations. Financial constraints also limited the ability of stations to keep the lights on, with 13 of the 86 stations (15%) reporting that they are operating with reduced working and programming hours.

Moreover, to protect the health and safety of their staff, many stations imposed social distancing rules and movement restrictions, which in turn reduced their ability to collect data on and produce certain types of programs. For example, UBC's Voice of Bundibugyo reported that they stopped hosting talk shows between March – August and people were not bringing announcements.

Despite these challenges, respondents reported that they realized some benefits as a result of COVID-19. When asked about the benefits of COVID-19 to their organization,

63% of respondents reported increased listenership. While this may not result in revenue in the short-term, if leveraged correctly by media houses this stronger audience base could result in new and increased revenue sources.

Feedback from respondents demonstrated that the community and other stakeholders showed their support to the media sector during the COVID-19 period with 20% stating that NGOs, 18% stating that community organizations, and 13% stating that the Government provided greater support to the sector during this period.

Figure 16: Main organizational benefits experienced by COVID-19 (quantitative survey)

COVID- 19 :the main benefits your organization is experiencing
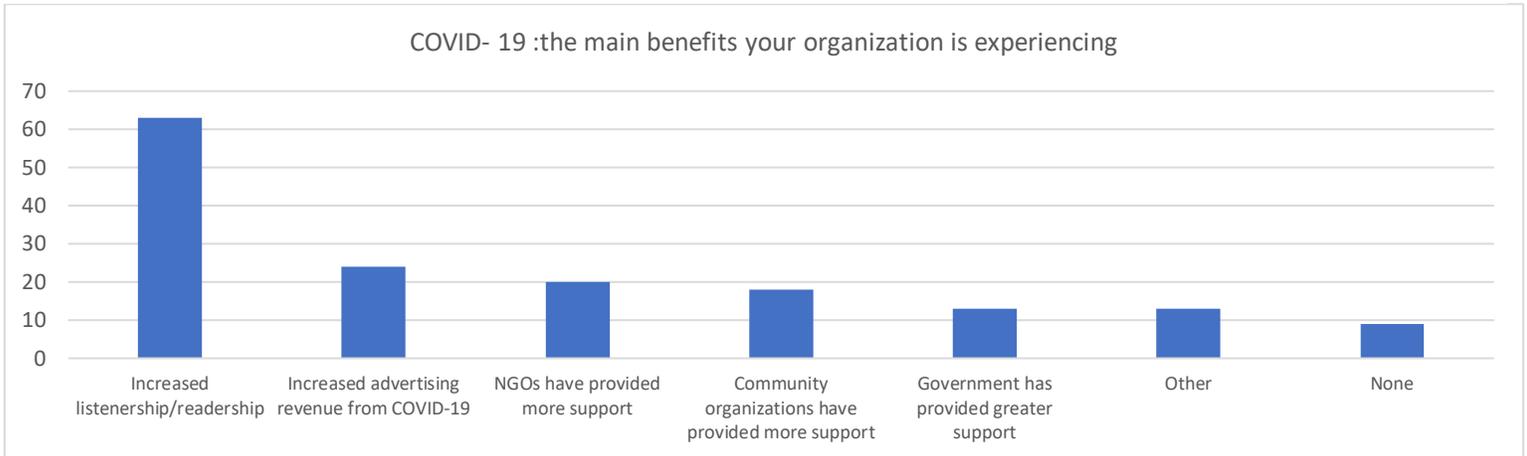
COVID-19 Recovery

Though the path to recovery will likely be difficult for many outlets, survey respondents were confident about their organization's ability to withstand this period of economic difficulty. When asked if their organization is economically robust enough to come through the pandemic and resume profitable business after it is over, 9 radio stations reported high confidence, 55 reported confidence, and only 5 organizations reported that they lacked confidence that their organization is economically robust enough.

The most common types of support needed to recover from the impact of COVID-19 were: advice on financial diversification (60%), advice on preventing infections while maintaining business operations (56%), and advice on business continuity planning (52%).

When asked what stations would do with additional funding, they stated: Procure or upgrade transmission equipment (44); Procure or upgrade studio room equipment (35); and Hire more advertising/marketing staff (33). These would all be strategic short to medium term investments because improving and expanding signal coverage, increasing sound quality, and hiring more advertising/marketing staff all directly contribute to increasing listenership and revenue generation.

As mentioned, given the limited donor investment in media development, it is not surprising that only 2 out of 86 respondents stated as a top priority they would "Invest time and resources to apply for more grant-based funding and financial opportunities."

Figure 17: Organizational support needed to recover from COVID-19 (quantitative survey)

What support do you need to recover from the impact of Covid19?
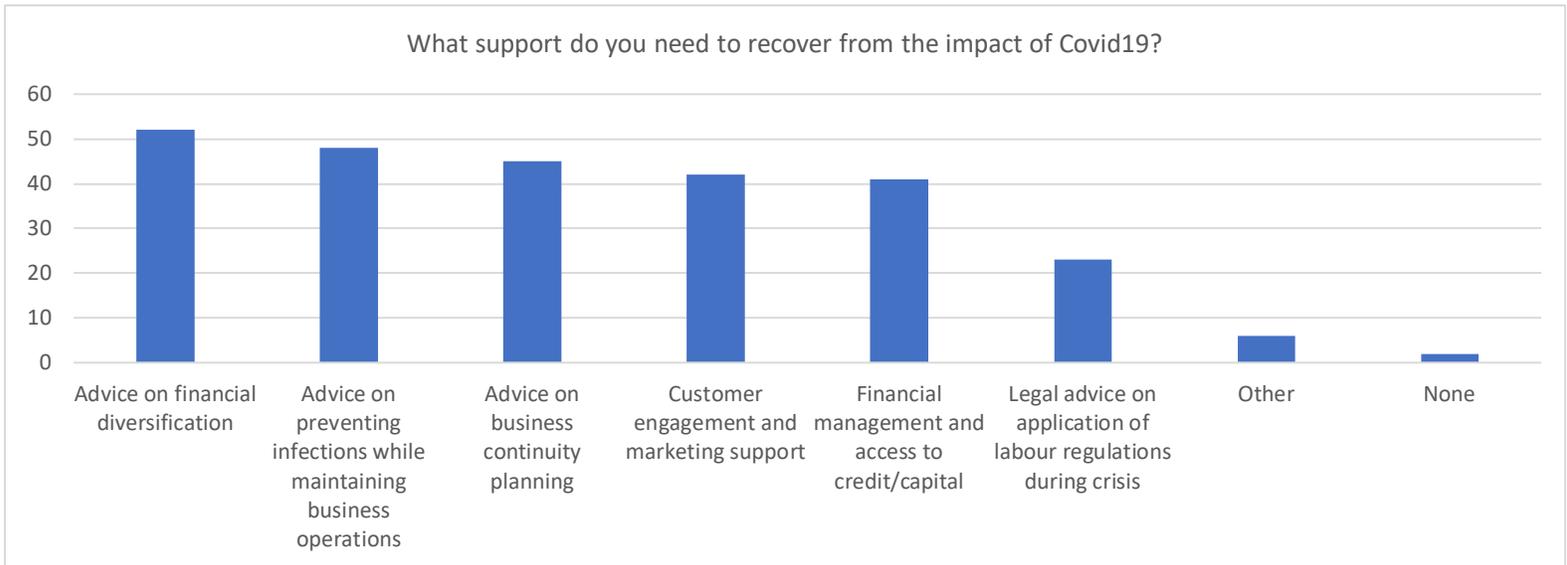
Figure 18: Post-COVID-19 organizational investment priorities (quantitative survey)

With additional funding, select the top three priorities for your organization
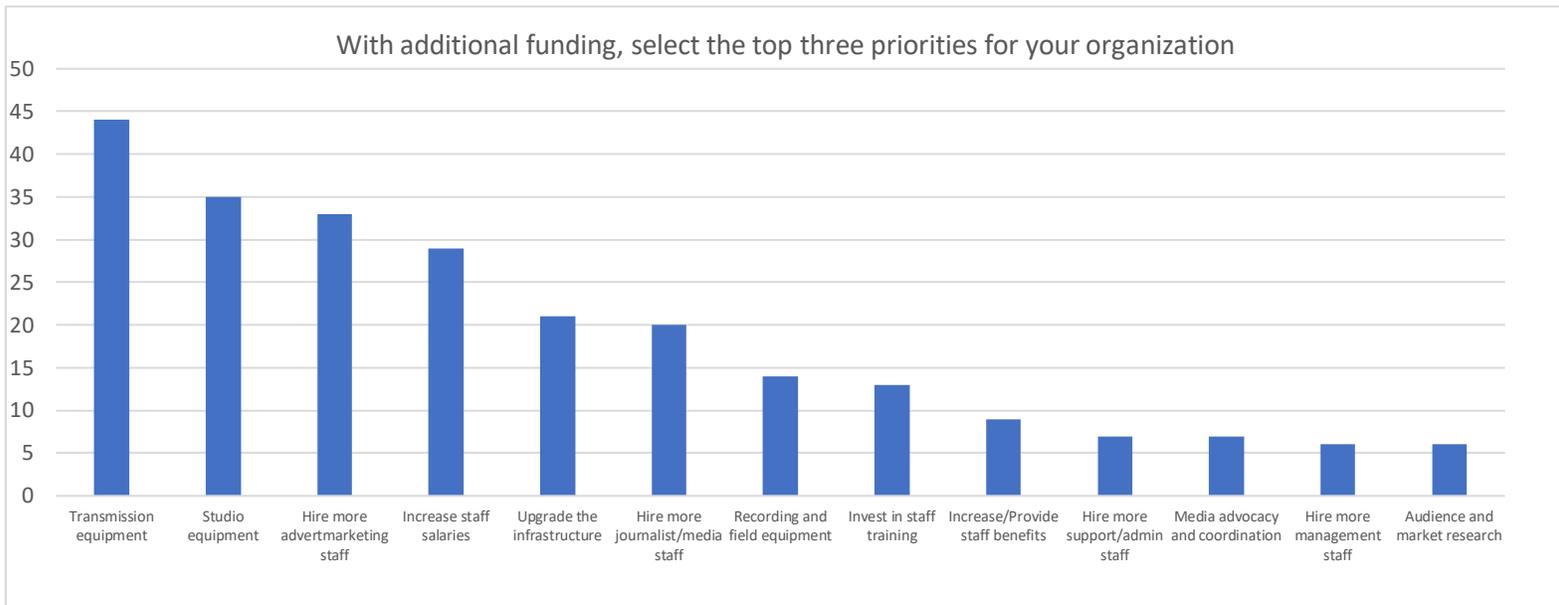
Conclusion and Recommendations

Overview: COVID-19 and mounting financial burdens, rising Uganda Communications Commission (UCC) compliance requirements that have forced stations to shutter their doors, and the targeting of the press and media outlets in the run-up and in the aftermath of the elections will continue to challenge the wider media sector in the near future.

It is intended that policymakers, government, civil society, academia, researchers, media development donors, and the media itself will utilize the findings and recommendations in this resource to identify areas for engagement and investment that would result in a more vibrant sector that provides reliable, quality, timely and localized information to all Ugandans.

Finally, there is need for Radio stations to improve their overall image, approachability and be more client and community focused. With the involvement of the Ministry of ICT, Uganda Communications Commission, Media Council and donors, a multi-stakeholder fund should be established to provide revolving funds, zero-interest loans, and support investment in media equipment and infrastructure. To be financially sustainable, radio stations need training and mentoring in advertising and marketing strategies, must diversify their advertising, innovate, and embrace technologies, such as high-quality mobile and online content.

There is also need for better coordination to improve the professionalism of the sector, as well as advocate for policies and regulations that protects the rights and safety of journalists and media houses. Capacity building for Journalists is needed to increase their knowledge and technical skills, so that Ugandans can have access to higher quality, fact-checked, balanced, and in-depth content that engages them across a range of economic and social areas.

It is also imperative that the enabling environment shifts from one that constrains sector growth and criminalizes journalists, to a favorable environment that protects the interests of the sector, fosters freedom of expression and safety of journalists, promotes media pluralism and diversity, and maintains high ethical standards, professionalism, and competence of journalists.

Concerted efforts are needed to attract and retain more females into media at all levels to change the male dominated sector and increase women's representation and influence.

Despite the overall low levels of internet penetration in Uganda, there is a need to equip journalists with digital skills to develop tailored online and mobile content to position themselves to expand and diversify both their audience and advertiser base.

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Annexes

Annex 1: Quantitative Survey Participating Radio Stations

Organization	Frequency	Est.
Central		
Nakaseke FM	90.2	2003
Digida FM	106.5	1999
Prime Radio	91.9	2002
Salt FM	107.0	2014
Mutundwe Christian Fellowship (MCF) Broadcasting Ministry ltd	98.7	2016
Dunamis Broadcasting	103.0	2003
Radio One FM	90.0	1997
Radio Bilal	94.1	2006
Tiger FM	102.5	2004
Tropical FM	88.4	2009
Baba FM Kampala	87.7	2009
Kazo FM	97.8	2019
Northern Broadcast Company Ltd (Radio King)	90.2	2006
Radio 4	10.3	2018
Capital FM	91.3	1980
Mboona International Limited	107.6	2010
Pearl of Africa	107.9	2011
Radio Kiboga (National Association of Professional Environments)	103.9	2016
Voice of Toro	101.0	1996
Impact Media Consortium	98.4	1999
INNERMAN FM	107.5	2013
Kingdom Media	93.0	
Magic FM (UBC)	100.0	2007
Power FM	104.1	1998
Radio Kinkizi	88.2	2001
Radio Maria Kampala	103.7	2001
Radio Pacis	90.9	2003
Radio Usalaama	99.7	2014
Success FM	104.7	2008
Top Media Consortium	89.6	1995

Youth FM (Amuria)	106.0	2007
East		
Voice of Busoga	89.8	2010
Singal FM	88.1	2008
Radio Veros Limited	90.2	2009
Smart FM	89.4	2002
Baba FM Jinga	87.7	2017
Maranatha	104.7	2008
Big FM	97.6	2007
Teso Broadcasting Service (TBS)	87.6	2017
City FM	96.0	2018
Aisa Radio (Ngora Radio)	92.3	2011
Voice of Teso	88.4	1998
Joshua FM	93.5	2007
Delta FM	97.0	2006
Kyoga Veritas Radio	91.5	2001
Victoria FM	92.5	2007
Faith Radio FM	90.5	2006
North		
Nile FM (Bomfree Technology Network)	94.1	2007
Radio Piwa	96.5	2000
Unity FM	97.7	2001
Nenah FM	88.7	2018
Spirit FM (Homenet)	104.5	2001
Radio Apac	92.9	1999
Shine FM (Oyam limited)	106.5	2010
Voice of Nile	106.1	2013
Dokolo FM	102.4	2005
Favour FM	89.5	2018
Transnile Broadcasting Service (TBS)	98.6	2008
Radio North	89.0	2003
Tembo	103.5	2013
Mighty Fire FM	91.5	2008
Gulu FM	92.7	2012
Aulogo FM	107.8	2017
Voice of Lango	88.0	2008

Speak FM	89.5	2012
West		
Radio Kyenjojo	94.2	1998
Radio 5	99.7	2011
Spice FM	89.9	2011
Bwera FM	92.5	1997
Liberty Broadcasting Services	89.0	2003
Radio Ankole	99.3	2005
Voice of Bunvoro	93.6	1989
Kool FM (Rubanda Tukore)	89.0	2010
Youth Foundation for Urban Rural Initiative	101.5	2015
Kasese Guide Radio	100.5	2008
Kagadi Broadcasting Services	93.0	2012
Radio Maria Hoima	90.7	2009
Development FM Radio	94.2	2007
KKCR Radio	91.7	2000
Kakumiro Community Radio (KCR)	95.1	2014
Messiah Radio	97.5	1998
Light Radio	102.9	2015
B FM	92.2	2007
Kitara FM (Masindi Broadcasting)	96.9	2001
Rwenzori FM	89.7	2006
Voice of Kigezi	89.5	2000

Annex 2: Key Informant Survey Participants

Name	Title	Organization	Type of organization	Location
Dr Chibita Monica	Dean, Faculty of Journalism, Media and Communication	Uganda Christian University	Academia	Kampala
Dr. Busingye Kabumba	Lecturer, Faculty of Law	Makerere University	Academia	Kampala
Lydia Namubiru	Journalist/Editor	Freelance	Freelance Journalist	Kampala
Tom Magumba	Journalist/Editor	Freelance	Freelance Journalist	Kampala
Isaac Kalembe	Senior Officer Consumer Affairs	Uganda Communications Commission	Government of Uganda	Kampala
Clement Aluma Aribo	Managing Editor	West Nile Journalist Association	Media Association	Arua
Moses Odokonyero	Coordinator	Northern Uganda Media Club	Media Association	Gulu
David Mukholi	Vice Chairman	Uganda Editors' Guild	Media Association	Kampala
Natasha Musimenta	Administrator	National Association of Broadcasters	Media Association	Kampala
Carol Ichumar	Chairperson	Karamoja Journalist Association/ Journalist Voice Media Gong	Media Association	Karamoja
Joseph Beyanga	Executive Secretary	Nation Media Group/National Association of Broadcasters	Media Outlet	Kampala
Joe Kigozi	Chief Strategy Officer	Next Media Services	Media Outlet	Kampala
Alex B. Atuhaire	Editorial Director	PML-Daily	Media Outlet	Kampala
Dixon Ampumuza	Executive Director	The Ugandan	Media Outlet	Kampala
Martin David Aliker	Editorial Director	Northern Era News	Media Outlet - Online	Gulu
Gay Mary	Programs Officer/ In charge	UBC- Voice of Bundibugyo - 93 FM	Media Outlet - Radio	Bundibugyo
Mtanga Godwill	Admin /Accountant	Development FM - 94.2 FM	Media Outlet - Radio	Bundibugyo
Mary Komuhimbo	News Editor/Anchor	Crane Radio - 87.6 FM	Media Outlet - Radio	Bushenyi
Natukunda Edward	Administrator Board	B FM - 92.2 FM	Media Outlet - Radio	Bushenyi
Patrick Lucy	Station Manager	Jubilee Radio - 105.6 FM	Media Outlet - Radio	Fort Portal
Kato Hussein	Marketing Manager	Voice of Toro - 101 FM	Media Outlet - Radio	Fort Portal
Leilah Bbale	News Editor	Spice FM	Media Outlet - Radio	Hoima
Thembo Muhayirwa Michael	News Editor	Messiah FM - 97.5 FM	Media Outlet - Radio	Kasese
Kanyonyi Geofrey	Station Manager	Light FM - 102.9 FM	Media Outlet - Radio	Kasese

Brian Kizito Karunde	Director	Buyamba - 90.9FM	Media Outlet - Radio	Lyantonde
Ft. Charles Ssekyewa	Station Manager	Centenary Radio - 88.1 FM	Media Outlet - Radio	Masaka
Olady	Presenter	Greater African Radio - 98.3 FM	Media Outlet - Radio	Mbarara
Econi Joshua Godfrey	Programs Director	Crooze FM - 91.2 FM	Media Outlet - Radio	Mbarara
Isaiah Orimwesiga	Station Manager	Grace Radio - 92.6 FM	Media Outlet - Radio	Mbarara
Robert Ssemwogerere	Station Manager	Radio Buwama - 90.2 FM	Media Outlet - Radio	Mpigi
Elliot	Station Manager	Ankole FM - 99.3 FM	Media Outlet - Radio	Ntungamo
Lugalama Edward	Station Manager	Mbabule - 101.1 FM	Media Outlet - Radio	Sembabule
Robert Sempala	Executive Director	Human Rights Network for Journalists	NGO	Kampala
Dr. Peter Mwesige	Executive Director	ACME	NGO	Kampala
Abbas Mpindi	Executive Director	Media Challenge Initiative	NGO	Kampala
Margaret Sentamu	Executive Director	Uganda Media Women's Association/Mama FM	NGO/Community Radio	Kampala

This section was compiled from a range of sources, including but not limited to primary and secondary documentation from: For further Information about laws and policies please refer to:
- The Uganda Legal Institute (https://ulii.org/)
- Media Council (https://mediacouncil.go.ug/acts-2/)
- Human Rights Network for Journalists-Uganda (https://www.hrnjuganda.org/media-legal-environment)

Chronological list of relevant laws and policies:
- Constitution (1995)
- Official Secrets Act (1964)
- Penal Code Act (1950 amended in 2007)
- Press and Journalist Act (2000) –Former the Press and Journalist Statute 1995
- Anti-Terrorism Act (2002)
- Access to Information Act (2005)
- Uganda Broadcasting Corporation Act (2005)
- Presidential Election Act (2005)
- Referendum and Other Provisions Act (2005)
- Parliamentary Elections Act (2005)
- Regulation of Interception of Communications Bill (2007)
- Access to Information Regulations Act (2007)
- Broadcasting Policy (2008)
- National Technology Act and the Regulation of Interception of Communications Act (2010)
- Computer Misuse Act (2011)
- Digital Migration Policy for Terrestrial Television Broadcasting in Uganda (2011)
- Access to Information Regulations (2011)
- Public Order Management Act (2013)
- National ICT policy (2014)
- The Anti-Pornography Act (2014)
- Communications Act 2013 (As amended in 2016)
- Data Protection and Privacy Act (2019)

Constitution (1995)

Article 29 - 1) Every person shall have the right to freedom of speech and expression, which shall include freedom of the press and other media.

Article 41 - 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.

Article 43 - 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;

2) Public interest in this article shall not permit – (a) political persecution; (b) detention without trial; (c) any limitation of the enjoyment of the rights and freedoms prescribed by this Chapter beyond what is acceptable and demonstrably justifiable in a free and democratic society, or what is provided in this Constitution.

Official Secrets Act (1964)
This law, in effect, requires public officials not to release information to the public, which they consider might be prejudicial to the state. Section 4 contains provisions on wrongful communication of information, and the circumstances that public officials can use to defend their refusal to release information to journalists or the public, which is contrary to the spirit of the Access to Information Act (2005). Further, Section 6 stipulates that interfering with officers of the police or members of the armed forces can also be invoked to prevent journalists from accessing certain venues that would be classified as prohibited from access.

Penal Code Act (1950 amended in 2007)
Section 41 criminalizes sectarian speech and forbids talk along tribal, religious, ethnic or other lines of differences among people. Specifically stating, "a person who prints, publishes, makes or utters any statement or does any act which is likely to (a) degrade, revile or expose to hatred or contempt; (b) create alienation or despondency of; (c) raise discontent or disaffection among; or (d) promote, in any other way, feelings of ill will or hostility among or against any group or body of persons on account of religion, tribe or ethnic or regional origin commits the offence of promoting sectarianism and is liable on conviction to imprisonment for a period of no more than five years."

Sections 49, 51 and 52 criminalize what authorities might interpret as inducing a boycott, incitement to violence and incitement to refuse or delay payment of tax.

Section 53 - Any person who, without such justification or excuse as would be sufficient in the case of the defamation of a private person, publishes anything intended to be read, or any sign or visible representation, tending to degrade, revile or expose to hatred or contempt any foreign prince, potentate, ambassador or other foreign dignitary with intent to disturb peace and friendship between Uganda and the country to which such prince, potentate, ambassador or dignitary belongs, commits a misdemeanor.

Section 179 - Any person who, by print, writing, painting, effigy or by any means otherwise than solely by gestures, spoken words or other sounds, unlawfully publishes any defamatory matter concerning another person, with intent to defame that person, commits the misdemeanour of libel.' A defamatory matter, as defined in article 180 of the code, is one 'likely to injure the reputation of any person by exposing that person to hatred,

contempt or ridicule, or likely to damage any person in his or her profession by an injury to his or her reputation.

Broadcasting Policy (2008)

Defines public broadcasting as "a system of broadcasting that is accountable to the public, and operated on a non-profit basis in order to meet the full range of public information needs in the overall public interest."

The Press and Journalist Act (Cap 105, 2000)

Formerly known as the Press and Journalist Statute 1995, when it was enacted in 1995 it repealed the Newspaper and Publications Act Cap 305 and the Press Censorship and Correction Act Cap 306, both of which were colonial laws. This law has many provisions that regulate mass media and limit freedom of expression:

- limits persons authorized to practice journalism;
- imposes requirements for journalists to register before practicing;
- requires journalists to obtain a certificate to practice journalism from the Minister of Information; and
- register editors and forces journalists to belong to the government sanctioned National Institute for Journalists of Uganda (NIJU).

The Media Council of Uganda was established by Section 8 (1) of the Press and Journalist Act, Cap 105 and charged with regulation of the Mass Media.

Calls for the establishment of the National Institute of Journalists of Uganda: "to establish and maintain professional standards for journalists; to foster the spirit of professional fellowship among journalists; to encourage, train, equip and enable journalists to play their part in society; to establish and maintain a mutual relationship with international journalists' organisations, and other organisations with a view to enhancing the objectives of the institute."

Professional code of ethics

- No journalist shall disseminate information or an allegation without establishing its correctness or truth.
- No journalist shall disclose the source of his or her information; he or she shall only divulge the source in the event of an overriding consideration of public interest and within the framework of the law of Uganda.

Anti-Terrorism Act (2002)

Section 9 (1) criminalizes the publication and dissemination of news or materials by 'Any person who establishes, runs or supports any institution for … publishing and disseminating news or materials that promote terrorism … commits an offence and shall be liable on conviction, to suffer death.' Yet, the Act does not define what is implied by the term 'terrorism'.

Section 3 (1) (c) of the Third Schedule of the Act fails to respect journalistic ethics by clearly excluding 'journalistic material which a person holds in confidence and which consists of documents or of records other than documents' from the list of items that are subject to legal privilege during terrorist investigations.

Section 11, the Act makes it a criminal offence for journalists to meet or speak with people or groups considered as terrorists, thus making it particularly difficult to report in conflict areas.

Access to Information Act (2005)

As stated in the Act 'to empower the public to effectively scrutinize and participate in Government decisions that affect them.' Many believe that this law has been rendered ineffectual by the Official Secrets Act of 1964, which encourages concealment of official information amongst public officials.

National Technology Act and the Regulation of Interception of Communications Act (2010)

This law was introduced to allow for the legal interception of communications in the course of transmission through any communication channel, including postal services. The law grants the Minister of Security broad powers and far-reaching discretion in surveillance and interception of all forms of communication, mandating the under Section the minister to establish and have 'final responsibility over the administration and functioning' of a Monitoring Center.

Amnesty International argues that "the broad and undefined basis for interception of communication also allows for possible intrusion into communications of individuals and professionals – such as journalists, human rights defenders and political dissidents engaged in legitimate activities and exercising their human rights, including freedom of expression and association."

Public Order Management Act (2013)

Commonly referred to as POMA, this law regulates the conduct and content of the discussion of issues at public meetings. This Act directly contravenes Articles 29 (1) of the Constitution that guarantees the freedom of speech and expression; freedom of thought, conscience and belief; freedom to assemble and to demonstrate together with others peacefully and unarmed and to petition; freedom of association which shall include the freedom to form and join associations or unions, including trade unions, political and other civic organizations respectively.

The Anti-Pornography Act (2014)

Sections 2, 3, 13, 14, and 16 inhibits media freedom in Uganda. Section 3 states that; "A person shall not produce, traffic in, publish, broadcast, procure, import, export, sell or abet any form of pornography." If convicted, the offences can attract a fine up to Uganda shillings ten (10) million (about USD 5,000) or imprisonment not exceeding 10 years or both.

Uganda Communications Act (2013 as amended in 2016)

The amendment effectively empowers the Minister in charge of Communication to pass legal instruments related to controlling the media without prior parliamentary approval.

Section 24 grants UCC the power to issue licenses "as the Commission may consider appropriate." As noted above, UCC has been widely criticized for inconsistency in the processing of licenses and the application of license of fees.

Annex 4: Uganda Bureau of Statistics, "Uganda Demographic and Health Survey," January 2018

Exposure to mass media: Women
Percentage of women age 15-49 who are exposed to specific media on a weekly basis, by background characteristics, Uganda DHS 2016

Background characteristic	Reads a newspaper at least once a week	Watches television at least once a week	Listens to the radio at least once a week	Accesses all three media at least once a week	Accesses none of the three media at least once a week	Number of women
Age						
15-19	10.8	20.9	54.5	4.2	37.6	**4,264**
20-24	10.8	24.9	61.8	5.6	31.1	**3,822**
25-29	11.7	25.3	60.0	6.4	32.3	**3,051**
30-34	8.7	20.5	59.3	5.0	35.2	**2,543**
35-39	8.3	18.8	59.1	4.8	36.3	**2,011**
40-44	8.5	14.6	58.4	4.6	37.9	**1,608**
45-49	7.2	13.0	58.0	3.3	38.1	**1,207**
Residence						
Urban	19.7	49.9	63.9	12.1	21.4	**4,943**
Rural	6.4	10.6	56.7	2.4	39.9	**13,563**
Region						
South Central	22.7	48.5	68.1	12.9	17.4	**2,494**
North Central	12.0	25.1	66.8	5.0	25.6	**1,963**
Kampala	25.6	76.2	64.9	18.6	12.7	**1,025**
Busoga	10.5	19.8	56.9	5.6	37.7	**1,690**
Bukedi	10.8	11.0	59.5	2.7	36.7	**1,169**
Bugisu	8.6	17.8	61.1	4.7	35.3	**921**
Teso	9.9	9.2	58.8	3.6	38.3	**1,099**
Karamoja	1.3	3.7	33.5	0.2	64.9	**365**
Lango	3.2	7.6	52.5	0.7	45.4	**1,010**
Acholi	3.3	4.3	36.3	0.5	61.5	**924**
West Nile	2.7	4.4	52.9	0.8	46.1	**1,247**
Bunyoro	2.5	7.3	44.0	0.8	52.6	**1,014**
Tooro	4.7	13.1	59.7	2.3	35.6	**1,357**
Kigezi	3.3	10.1	64.9	1.8	33.0	**732**
Ankole	4.7	12.5	62.0	1.9	33.4	**1,498**
Special area						
Island districts	6.8	22.7	57.6	2.8	36.2	**203**
Mountain districts	6.4	15.5	51.6	3.3	43.3	**1,481**
Greater Kampala	27.5	73.3	65.5	19.3	12.6	**2,048**
Education						
No education	0.3	6.3	41.3	0.2	56.6	**1,781**
Primary	4.0	11.4	55.7	1.0	40.3	**10,630**

Exposure to mass media: Men
Percentage of men age 15-49 who are exposed to specific media on a weekly basis, by background characteristics, Uganda DHS 2016

Background characteristic	Reads a newspaper at least once a week	Watches television at least once a week	Listens to the radio at least once a week	Accesses all three media at least once a week	Accesses none of the three media at least once a week	Number of men
Age						
15-19	10.3	26.8	66.4	5.3	27.8	**1,288**
20-24	14.8	37.7	72.9	10.6	21.3	**949**
25-29	19.0	30.9	74.3	12.6	20.7	**741**
30-34	19.7	33.8	75.2	12.2	19.4	**735**
35-39	18.5	28.7	66.0	11.2	29.3	**491**
40-44	20.2	31.1	69.8	11.6	23.8	**511**
45-49	17.1	24.2	67.6	8.9	27.6	**320**
Residence						
Urban	32.6	59.6	75.8	23.0	12.1	**1,274**
Rural	10.5	21.2	68.6	5.4	28.1	**3,763**
Region						
South Central	23.9	47.2	73.3	15.9	17.6	**661**
North Central	14.3	39.2	72.7	10.8	21.0	**592**
Kampala	40.1	76.8	72.6	30.6	10.1	**291**
Busoga	11.5	18.8	74.4	5.9	20.4	**412**
Bukedi	7.8	10.8	51.6	2.0	46.1	**335**
Bugisu	6.3	15.9	46.3	4.6	51.5	**258**
Teso	20.9	17.2	65.2	6.9	28.9	**276**
Karamoja	3.0	2.8	26.0	0.6	73.1	**80**
Lango	10.7	9.8	68.1	3.8	30.6	**328**
Acholi	9.1	7.5	60.9	1.7	36.3	**271**
West Nile	6.3	20.0	77.1	3.4	20.0	**281**
Bunyoro	17.0	31.9	66.9	11.1	28.5	**265**
Tooro	17.8	44.3	83.8	12.7	10.6	**400**
Kigezi	17.5	29.5	88.8	11.2	7.3	**181**
Ankole	18.2	39.8	84.5	11.8	11.0	**406**
Special area						
Island districts	11.6	40.9	77.3	7.2	15.6	**71**
Mountain districts	15.6	32.3	63.7	12.6	32.1	**386**
Greater Kampala	37.1	68.1	72.6	26.7	10.5	**522**
Education						
No education	2.1	12.9	45.5	0.0	47.1	**194**
Primary	6.7	21.2	67.0	3.3	29.8	**2,767**

Secondary	17.2	36.9	67.7	8.9	21.5	**4,639**
More than secondary	42.3	59.8	72.0	27.7	12.4	**1,456**
Lowest	2.0	1.8	33.8	0.4	64.7	**3,247**
Second	3.5	3.6	51.8	0.6	46.6	**3,397**
Middle	4.6	5.1	62.8	0.6	35.2	**3,460**
Fourth	9.2	12.5	70.2	3.1	26.2	**3,683**
Highest	24.5	65.5	68.5	16.0	12.9	**4,720**
Total	**9.9**	**21.1**	**58.6**	**5.0**	**35.0**	**18,506**

(Wealth quintile rows: Lowest, Second, Middle, Fourth, Highest)

Secondary	21.1	39.7	76.4	12.9	16.2	**1,451**
More than secondary	50.2	59.5	79.7	34.9	9.4	**626**
Lowest	4.6	5.2	49.7	0.9	48.9	**859**
Second	6.0	12.5	65.3	1.5	31.8	**899**
Middle	8.4	22.2	77.6	3.8	20.0	**963**
Fourth	15.2	32.1	78.4	8.9	17.6	**1,102**
Highest	38.5	68.6	76.0	28.1	9.6	**1,213**
Total 15-49	**16.1**	**30.9**	**70.4**	**9.8**	**24.0**	**5,037**
50-54	**17.2**	**17.9**	**77.2**	**9.2**	**22.6**	**299**
Total 15-54	**16.1**	**30.2**	**70.8**	**9.8**	**23.9**	**5,336**

(Wealth quintile rows: Lowest, Second, Middle, Fourth, Highest)

Internews

Internews empowers people worldwide with trustworthy, high-quality news and information they need to make informed decisions, participate in their communities, and hold power to account.

We seek to realize the potential of a digitally connected world: a world in which evidence-based information advances human progress, enables broad opportunity and accountability, and fuels vibrant civic debate.

For nearly 40 years, in more than 100 countries, Internews has worked to build healthy media and information environments where they are most needed. We have proudly incubated hundreds of sustainable organizations, bolstered the skills of thousands of media professionals, activists, and citizens, and helped these partners reach millions of people with quality, local information.

Internews is an international non-profit organization, with administrative centers in California, Washington DC, London, and Paris, as well as regional hubs in Bangkok, Kiev and Nairobi. Formed in 1982, Internews has worked in more than 100 countries, and currently has offices in Africa, Asia, Europe, the Middle East, Latin America and North America.