



Access Now, ARTICLE 19 Eastern Africa, and Gisa Group Joint-Submission to the United Nations Human Rights Council on the Universal Periodic Review 2021, Third Cycle for Sudan

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Access Now is an international organisation that works to defend and extend the digital rights of users globally. Through representation around the world, Access Now provides thought leadership and policy recommendations to the public and private sectors to ensure the continued openness of the internet and the protection of fundamental rights. By combining direct technical support, comprehensive policy engagement, global advocacy, grassroots grantmaking, legal interventions and conventions such as RightsCon, we fight for human rights in the digital age. As an ECOSOC accredited organisation, Access Now routinely engages with the United Nations (UN) in support of our mission to extend and defend human rights in the digital age.¹

ARTICLE 19 Eastern Africa (EA) is a leading non-governmental organisation promoting and protecting freedom of expression and access to information, both offline and online. ARTICLE 19 EA works across the region in fourteen (14) countries including Kenya, Tanzania, Uganda, Rwanda, Burundi, Somalia, Sudan, South Sudan, Djibouti, Eritrea, Ethiopia, Madagascar, Comoros, and Seychelles. ARTICLE 19 EA fulfils its mandate in partnership with other national and regional organizations and mechanisms and creates solidarity networks aimed at safeguarding freedom of expression and information.

The organisation envisions a region where all people can speak freely, actively participate in public life and enjoy media freedom without fear, censorship or persecution. Its mission is to promote, protect, develop and fulfil freedom of expression and the free flow of information and ideas in order to strengthen regional social justice and empower people to make autonomous choices. ARTICLE 19 EA provides a unique contribution to the protection and promotion of these rights and freedoms through the following thematic areas: Digital, Media, Civic Space, Transparency, and Protection.

Gisa Group powers civic engagement in Sudan by building platforms that promote justice and accountability while protecting and improving opportunities to create and access trusted information. Gisa group runs three programs in Sudan: Access to Justice, Civic Engagement, and Media Development. Each program is run independently and supported by a global administrative support hub and Collaborative Futures, a tech lab that creates frontline tools and

¹ Access Now, [Access Now About Us](#).

technology to amplify and scale impact. Our platform and hub-based approach allows us to dramatically increase our impact by providing our partners with the tools, platforms, spaces and resources to do what they do best; change their communities for the better. Over a decade, Gisa Group's highly collaborative projects have trained and empowered hundreds of individuals and organizations working on digital rights, access to information, human rights, and transitional justice. This work has resulted in thousands of productions including films, news reports, campaigns, community events, fiction films, documentaries, and events.

I. Introduction

1. The Universal Periodic Review (UPR) is an important UN mechanism aimed at addressing human rights issues across the globe. Access Now, Gisa Group and ARTICLE 19 East Africa welcome the opportunity to contribute to Sudan's third review cycle.
2. This submission examines (1) internet shutdowns and the right to protest and peaceful assembly, (2) press freedom and freedom of expression, and (3) the right to access information. Specifically, this submission raises concerns regarding internet shutdowns, the right to protest peacefully and without fear of retaliation, the rights and freedoms of journalists and independent reporters, freedom of expression that accrues to all citizens, and amendments to laws that increase the likelihood of arbitrary prosecution, harassment and detention.

II. Follow up from previous UPR

3. This is the third UPR for Sudan, last reviewed in May 2016 and May 2011 respectively.² During the second UPR, Sudan received 244 recommendations, of which 180 were accepted and 64 noted.³
4. The rights to freedom of opinion and expression, access to information, and freedom of assembly and association remain priority issues for Sudan's third UPR.

III. International, regional, and domestic human rights obligations

5. Sudan has signed and ratified the International Covenant on Civil and Political Rights (ICCPR), and the International Covenant on Economic, Social and Cultural Rights (ICESCR). Sudan has yet to ratify the Optional Protocols to both the ICCPR and the ICESCR.⁴
6. Sudan is a signatory to the African Charter on Human and People's Rights (ACHPR) and has ratified the law; which guarantees the right to freedom of assembly, freedom of expression and the right to receive information.⁵

² OHCHR, UN Human Rights Council, [Universal Periodic Review - Sudan](#)

³ UPR Info, [2RP: Responses to Recommendations & Voluntary Pledges Sudan](#), 2016.

⁴ OHCHR, [Status of Ratification Interactive Dashboard - Sudan](#).

⁵ ACHPR, [African Charter on Human and People's Rights \(Banjul Charter\)](#)

7. The Constitutional Charter for the Transitional Period of 2019, recognizes in Article 42(2) all rights and freedoms guaranteed by international and regional human rights treaties and conventions to which Sudan is a signatory. Article 46, recognises the right to personal freedom. Article 55 recognises the right to privacy, Article 57 recognises the right to freedom of expression and press and also recognises the right to receive and publish information and further; that every citizen has the right to access the internet, and Article 58 recognises the right to freedom of assembly. These rights are not absolute and the constitution provides for their limitation in Articles 42 and 58 as necessary in a democratic society, and in articles 46, 55 and 57 in accordance with what is determined by law.⁶

IV. Freedom of expression and the peaceful assembly and association

Internet shutdowns and the right to protest

8. While states claim that internet shutdowns increase public safety or national security, they in fact enable human rights violations to take place in the dark. There is, however, a consistent push and commitment by the international community to oppose internet shutdowns, with evidence showing that shutdowns are a violation of international human rights law.⁷ For instance, in 2020, the UN Human Rights Council issued a resolution on the right to freedom of opinion and expression “strongly condemn[ing] the use of internet shutdowns to intentionally and arbitrarily prevent or disrupt access to or dissemination of information online” and called on governments to refrain from such acts.⁸ Further, experts from the United Nations, Organization for Security and Co-operation in Europe (OSCE), Organization of American States (OAS), and the African Commission on Human and Peoples’ Rights (ACHPR), declared⁹ that internet “kill switches” can never be justified under international human rights law, even in times of conflict.¹⁰
9. Since the last UPR, Sudan has experienced political change. In the period under review, Sudan has shut down or throttled the internet and shut down access to various services, including blocking of social media platforms Facebook, WhatsApp and Twitter, 4 times; with the most significant shutdowns imposed at different points during the revolution. First, in late 2018, the former Al Bashir government shutdown the internet as a response to nationwide protests against the soaring price of food and fuel which led to his ouster from the Presidency.¹¹ Second, in June 2019, the Transitional Military Council (TMC) shutdown mobile internet for 37 days when citizens demanded that power be handed

⁶ Constitute Project, [The Constitution of Sudan](#)

⁷ Access Now, [There is a direct link between internet shutdowns and human rights violations](#), 11 June 2019

⁸ [Resolution adopted by the Human Rights Council on 16 July 2020](#)

⁹ Article 19, Joint [Declaration on Freedom of expression and the internet](#), 22 May 2011

¹⁰ Access Now, [Internet kill switches are a violation of human rights law, declare major UN and rights experts](#), 4 May 2015

¹¹ Press Release by the Special Rapporteur on Freedom of Expression and Access to Information in Africa on the Continuing Trend of Internet and Social Media Shutdowns in Africa <https://www.achpr.org/pressrelease/detail?id=8>

over to a civilian-led government. During this period, government forces led by the Rapid Support Forces (RSF) violently attacked peaceful protestors, killing at least 120 people and injuring over 700. The RSF also committed acts of sexual violence, rape, burning and looting of protest tents, and humiliation of protestors.¹²

10. In addition, Sudan has also shut down the internet during national examinations, a method that has proven ineffective in curbing exam cheating over the years in the jurisdictions that employ it.¹³ In 2020, Sudan's Telecommunications and Post Regulatory Authority announced internet access to be shut down during the national examination period, everyday for three hours between 13 and 24 September.¹⁴ According to the regulator's statement, the shutdown included mobile internet and data SIM cards only.¹⁵ The shutdown was met with public outcry, and lawsuits against the telecommunications companies were filed by a lawyer and the Secretary General of the Consumer Protection Association.¹⁶
11. Sudan's ICT infrastructure plays a significant role in the frequency and ease of imposing shutdowns. In August 2019, the Sudan council of ministers transferred control of the Telecommunications and Post Regulatory Authority to the Ministry of Defence¹⁷, a move that was later reversed in September 2019, placing the Agency under the direct purview of the Council¹⁸. This latter move notwithstanding, the military still holds significant control over the telecommunications sector by appointing loyalist directors, among other strategies.¹⁹
12. In addition to violating international human rights law, internet shutdowns have been shown to greatly and negatively affect the economy of a country. Sudan is no exception, it is estimated that the 2019 shutdown cost the Sudan economy USD 1.3 Billion, a staggering amount.²⁰
13. Internet shutdowns are a blatant tool employed by states to unlawfully quell protests and dissent. According to data collected by Access Now and the #KeepItOn coalition, "in

¹² Human Rights Watch, [Sudan: Justice Needed for Protester Killings](#), 17 November 2019.

¹³ Access Now, [internet shutdowns in Algeria and Sudan: damaging circumstances in exceptional circumstances](#), 5 October 2020.

¹⁴ Sky News Arabia, [Sudan ... Internet cutoff fuels suspicions of "high school exams"](#) (in Arabic), 17th September 2020.

¹⁵ SUNA, [Telecommunications Regulatory Authority: Internet shutdown is necessary for the benefit of students and the country](#), 17 September 2020.

¹⁶ Al Taghyeer, [A Sudanese court receives cases against the telecom companies for blocking the internet](#), 20 September 2020.

¹⁷ Alrakoba.net, [Devolution of the Communications and Postal Regulatory Agency to the Ministry of Defence](#), September 2019.

¹⁸ Anadolu Agency, [Council cancels earlier decision](#), 19 September 2019.

¹⁹ SMEX, [Military-Controlled Telecom Sector and Internet Shutdowns in Sudan](#), 12 November 2020.

²⁰ Geoffrey York, [By shutting down the internet, Sudan cripples protests and the booming digital economy](#), The Globe and Mail, 4 July 2019.

2019, the most commonly observed cause of internet shutdowns were protests.”²¹

14. Since 2018, protesters have continued demanding faster reforms in governments. However, the government continues to crack down on protesters, mostly resulting in excessive use of force.²² The first wave of protests against the harsh economic environment began in mid December 2018. In response, the security personnel used live bullets indiscriminately leading to deaths of protesters.²³ On June 30, 2020, one protester was killed and many others injured by the security personnel during a peaceful mass protest calling for greater civilian rule.²⁴ On October 15, 2020, 8 protesters were killed and 17 others injured in the state of Kassala, east of Sudan.²⁵
15. Studies have further shown that the right to assembly, enshrined in Article 58 of Sudan’s transitional Constitutional Charter, is adversely affected when internet shutdowns or throttling are imposed. The effects of these restrictions include slower communication amongst dissidents, resulting in delayed and inefficient organising, isolation of groups from their core support network, reduced channels for recruitment of new supporters, limited access to moral and material support, and limited exchange of information, which ensures there is no reporting and documentation of human rights abuses and violations.²⁶
16. During the shutdown in June 2019, there were reports of egregious human rights violations which could amount to crimes against humanity²⁷ perpetrated by the military during the information blackout in order to quell protests and news reporting on the crackdown, which resulted in the killing of over 120 people, over 700 injured, and over 70 raped.²⁸ The shutdown made it difficult for journalists and human rights defenders to accurately report on the atrocities that occurred in Sudan as well as impeded individuals’ to access medical services.²⁹ Many local and international media outlets were unable to speak with their sources, file their stories, and verify the many videos that were posted online. Notably, the alternative forms of communications, SMS and mobile phone calls, were insecure, putting journalists, activists, human rights defenders, and even

²¹ Access Now, [Targeted, Cut Off, and Left in the Dark: The #KeptOn report on internet shutdowns in 2019](#), 2020, see also Access Now [Defending Peaceful Assembly and Association in the Digital Age](#), 2020.

²² Human Rights Watch, [They were shouting ‘Kill Them’](#), 17 November 2019

²³ African Centre for Justice and Peace Studies, [Sudan: Killing of peaceful protesters and a wave of arbitrary arrests and detention by Sudanese authorities](#), December 14 – 24, 2018

²⁴ Middle East Eye, [Protests erupt in Sudan as calls mount to ‘correct’ the revolution](#), 30 June 2020

²⁵ Asharq Al-Awsat, [8 Killed, 17 Wounded During Protests in Sudan’s Kassala](#), 16 October 2020

²⁶ Anita Ghoades, [Repression Technology: Internet Accessibility and State Violence](#), American Journal of Political Science, 13 February 2020

²⁷ Human Rights Watch, [Sudan: Justice Needed for Protester Killings](#), 18 November 2019

²⁸ The Guardian, [Hospitals in Khartoum record more than 70 cases of rape in aftermath of attack on protest](#), 11 June 2019

²⁹ Human Rights Watch, [Sudan: End Network Shutdown Immediately Internet Vital for Safety, Communications in Crisis](#), 12 June 2019

emergency service providers in danger.³⁰

Press freedom

17. During its last UPR cycle, Sudan accepted the recommendation to reform the 2009 Press and Publications Act,³¹ which places restrictions on the press under the pretext of protecting “public order and morals”, grants extensive regulatory powers to the Press and Publications National Council (“the Council”) including the appointment of editors-in-chief and levying sanctions on media and publication houses, holds editors-in-chief criminally liable for all content published in their newspapers, and prohibits journalists under vague provisions from reporting on state secrets, security-related matters, or other issues which are “inconsistent with religion, noble belief customs, or science”.³²
18. Sudan has instead tightened regulations on journalists. In 2018, the Sudanese Cabinet approved a controversial draft amendment to the Press and Publications Act which placed greater restrictions on media and journalists. The amendments made to include online press and newspapers, granted the Council greater powers including the authority to license online publishing, the ability to suspend newspaper publication for a period not exceeding 15 days, up from 7 days in the previous law, and to suspend journalists from writing indefinitely.³³ Furthermore, the vague definition of “electronic publishing” in the law allows for the inclusion of all online platforms including social media apps. It is worth noting that the full text of the draft has not been made public. Sudanese journalists protested against the amendments, noting that the amendments aimed to silence journalists ahead of the 2020 elections.³⁴
19. During the escalating protests in December 2018, the government prohibited the London-based Alaraby TV from covering protests across Sudan and ordered its correspondents to leave the country.³⁵ Several reporters reported being subjected to acts of police brutality, including arbitrary confiscation of their work gadgets.³⁶
20. The military in Sudan in a crackdown on press freedom in 2019, without any reason, closed down offices of the *Al Jazeera Media Network* in Khartoum and barred its journalists from reporting from the country as protests intensified.³⁷ Amnesty International reported that at least 15 journalists had been arrested and detained by the nation’s intelligence body between January and October 2018, print runs confiscated over 27 times; with *Al Jazeera*, an independent publication making up at least 13 of those

³⁰ Access Now, [#IAMTheSudanRevolution: There’s a direct link between internet shutdowns and human rights violations in Sudan!](#), 2019.

³¹ Ibid, 3

³² MENA Rights Group, [The Press and Press Printed Materials Act](#), 2009

³³ Dabanga Sudan, [Sudan: Journalists decry new Act to curtail press](#), 24 June 2018

³⁴ Ultra Sawt, [New Sudanese Press Law ... Hurricane Against Freedoms](#), 27 June 2018

³⁵ Sudan Tribune, [Sudan expels Arab journalist for covering protests](#), 26 December 2018

³⁶ Id.

³⁷ Al Jazeera, [Sudan army says protest site a threat, closes Al Jazeera Office](#), 31 May 2019

confiscations and several tv shows shutdown or suspended in the same year.³⁸

21. The Sudanese military council has gone to lengths to ensure that press freedom and freedom of expression are curtailed. Yet another law from the Al Bashir regime was amended to impose further penalties on offences tailored to restrict press freedom and freedom of expression. The law on combating cybercrimes, also known as the Informatics Offences Act (2007), was amended to introduce an imprisonable offence that seeks to convict any person who spreads misinformation or rumours about the military; this, without regard for the joint declaration issued in 2017 by the UN and ACHPR among other organisations that affirmed that “general prohibitions on the dissemination of information based on vague and ambiguous ideas, including ‘false news’ or ‘non-objective information’, are incompatible with international standards for restrictions on freedom of expression ... and should be abolished”.³⁹ The cybercrime law imposes harsh penalties such as imprisonment for up to 2 years, flogging or paying fines for “anyone who uses a telecom or information network or an application or any other communication tool to publish rumors or news or a report and he/she knows it's fake aiming to spread the fear to the people or threatening the public peace or decreasing the prestige of the state”.⁴⁰
22. The Law on Combating Cybercrimes has been used by the former regime to silence online dissent and target activists and journalists. In July 2020, the Sudanese military announced that "legal action will be available against activists, journalists and others, both inside and outside the country," invoking the cybercrime law.⁴¹
23. Reports indicate that in early 2021, journalists -both local and international- were refused access to Darfur in the middle of intercommunal clashes that left 250 people dead and more than 100,000 people displaced.⁴² It was only after widespread criticism that the government allowed travel and reporting in the area.⁴³
24. The Law on Combating Cybercrimes was revised in 2018 to introduce criminal sanctions of fake news. In the later amendments introduced in July, 2020 the penalties for most offences, including online defamation, online extortion, hacking of government websites and sharing false information on social media were increased.⁴⁴ Under the 2018 Law, Article 23 for instance provides for “imprisonment for less than one year, flogging, or paying a fine” for “anyone who uses the internet, or any means of communications, information or applications to disseminate any news, rumor or report, knowing it’s fake,

³⁸ Amnesty International, [Sudan: Relentless harassment, intimidation and censorship of journalists must end](#), 2 November 2018

³⁹ [JOINT DECLARATION ON FREEDOM OF EXPRESSION AND “FAKE NEWS”, DISINFORMATION AND PROPAGANDA](#), 3 March 2017

⁴⁰ Khattab Hamad, [Sudan's revised cybercrime law falls short on its promise](#), Global Voices, 4 March 2021.

⁴¹ Agence France-Presse, [Sudan Army Vows to Answer 'Insults' With Lawsuits](#), 18 July 2020.

⁴² UN News, [Sudan: 250 killed, over 100,000 displaced as violence surges in Darfur](#), 22 January 2021.

⁴³ Dabanga Sudan, [Journalists allowed to travel into Darfur after criticism](#), 28 January 2021.

⁴⁴ Freedom House, Freedom on the Net 2020- Sudan <https://freedomhouse.org/country/sudan/freedom-net/2020>

to cause public fear or panic, threaten public safety and offend the reputation of the state.⁴⁵ In July 2020, the military confirmed that a cybercrimes commissioner would be appointed to prosecute insults against the military.⁴⁶

25. These laws once again fall victim to the ‘national security’ and ‘sensitive information’ trope that has been flogged to no end. The danger in enforcing such provisions lies in the high possibility of their misinterpretation, abuse, and arbitrary application. CPJ further points out that several journalists — even before this amendment — have been contacted by the military to pull down online posts that appeared to criticise the military,⁴⁷ having a law that now sanctions such arbitrary actions, does not help the situation in Sudan.

Access to information

26. It is imperative that everyone, especially those living in poverty, including persons with disabilities, and other marginalized groups, have access to a high-quality, open, and secure internet connection. In light of the COVID-19 pandemic, the internet is an essential tool for employment, education, health, communication, political engagement, and accessing other important resources. Moreover, those without a connection are cut off from exercising a broad range of human rights, including the right to access information.⁴⁸ Access to the internet therefore becomes even more important in the COVID-19 context as the internet is a fundamental tool for the dissemination of public health information, such as preventive measures, and governmental responses and guidelines to contain the spread of the virus.⁴⁹
27. In the context of COVID-19, Radio Dabanga and CPJ reported an instance of 2 two journalists allegedly facing investigation for their reporting efforts with regard to COVID-19 associated deaths. The journalists received several phone calls asking them to present themselves to their local intelligence division, and upon failing to do so, were accosted by a military intelligence officer while out in public.⁵⁰ Governments are required to provide adequate access to accurate information under international human rights law.⁵¹ This includes the right to disseminate, and receive information, including information concerning health.⁵²

⁴⁵ SMEX, [Do new Sudanese laws regulate digital space or limit freedom of expression?](#), 23 July 2018 .

⁴⁶ Voice of Africa, [Sudan Army’s Plan Is to Return to ‘Dark Days,’ Journalists Say](#), 6 August 2020.

⁴⁷ CPJ [Sudan tightens cybercrime law as army pursues “fake news”](#), 23 November 2020.

⁴⁸ Access Now, Access Now releases "[Expanding connectivity to fight COVID-19: recommendations for governments and telcos](#)", 30 April 2020.

⁴⁹ Access Now, [#KeepItOn: Internet shutdowns during COVID-19 will help spread the virus!](#), 17 March 2020.

⁵⁰ CPJ [Sudanese authorities in North Darfur state harass 2 journalists reporting on COVID-19](#), 31 July 2020

⁵¹ Access Now, [Fighting Misinformation and Defending Free Expression During COVID-19: Recommendations for States](#) April 2020

⁵² CESCR General Comment No. 14: The Right to the Highest Attainable Standard of Health (Art. 12), para. 12 (b).

28. Sudan's Access to Information Act⁵³ has faced criticism on several fronts. It lists 12 classes of information that citizens are not allowed to access on the basis of their sensitivity including;

- a. Secret documents and other documents protected in accordance to other legislation
- b. Classified documents which can be obtained in agreement with another country
- c. Secrets related to national defence, state security, foreign policy, which are less than 50 years old
- d. Information which includes analysis, recommendations, suggestions, or consultations pertaining to an ongoing decision. This includes communications and information exchanged between different relevant parties;
- e. Personal information and files related to a person's education files, medical files, employment files, bank accounts and transfers, professional secrets, as well as information related to trade, industry, finance, or economy which if released or accessed could infringe on copyright, intellectual property, fair competition, or lead to illegitimate gain or loss;
- f. Personal and private communications, whether via mail, telephone, or any other means
- g. Information which could influence unconcluded negotiations
- h. Investigations carried out by judicial or security agencies into crimes within its jurisdiction as well as investigations carried out by specialized authorities into financial and customary non-compliance
- i. Any information obtained by public administration in a confidential manner
- j. Information that includes trade secrets or information that may harm trade
- k. Any information that was marked by a publication date

29. Mohamed Suliman, a writer with Global Voices, maintains that those provisions are intentionally vague to further the government's interests. The law also imposes fees on freedom of information requests; which in the long run ensures that access to certain information remains a reserve only for persons who can afford the fees imposed on these types of requests.⁵⁴

IV. Recommendations

30. We urge that the rights to freedom of expression, freedom of peaceful assembly and access to information remain prominent issues in the upcoming UPR review cycle. We therefore recommend that Sudan:

31. Sign and ratify the Optional Protocols to the International Convention on Civil and Political Rights (ICCPR) and the International Covenant on Economic, Social and Cultural Rights (ICESCR).

⁵³ [Sudan Access to Information Act](#)

⁵⁴ Mohamed Suliman, [The case for reforming the Sudanese Access to Information Act](#), Global Voices Advox, 28 August 2019.

32. Ratify and domesticate the Convention Against Torture or other Inhuman or Degrading Treatment or Punishment and its Optional Protocol.
33. Amend the Press and Publications Act, the Access to Information Act, and the Informatics Offences Act, to uphold the fundamental rights enshrined in Sudan's interim constitution, and align with Sudan's international human rights obligations.
34. Ensure transparency of all institutional reforms and involve civil society and the public in the amendment of national laws.

Access to Information

35. Amend the Access to Information Act of 2015 in line with international human rights standards and ensure its proper functioning with appropriate administrative resources, support, and accessibility, including the establishment of an independent commission as stipulated by the law.
36. Amend the Access to Information Act of 2015 to repeal potential fee charges for the access to information requests (Article 10) and ensure citizens can exercise their right to access information freely and without barriers; include a provision to impose obligation on information holders to proactively disclose information in line with Section 7 of the Model Law on Access to Information for Africa by the African Commission on Human and Peoples' Rights.
37. Limitations to access to information must be amended in the law to include precise and narrowly-defined exceptions guided by the principles of proportionality and maximum disclosure.

Internet Shutdowns and freedom of assembly

38. Refrain from shutting down the internet and blocking social media and make a state pledge to refrain from imposing any restrictions on internet access and telecommunication in the future, particularly during political and democratic processes.
39. Investigate, through an independent committee, violations of protesters since December 2018 with a view of availing redress for the victims.
40. Ensure the independence and civil-led governance of Sudan's ICT infrastructure and regulatory bodies.

Freedom of expression and media freedom

41. Remove arbitrary and onerous licensing requirements on media workers and publications, including electronic publishers; decriminalize defamation and remove criminal liability on editors and publishers; repeal the 2018 amendment to the Press and Publications Act; and repeal the Informatics Offences Act.

42. Allow the media to freely report on COVID-19 and other related topics and make accurate information easily available and accessible.
43. Take concrete steps to independently investigate attacks against journalists and human rights defenders.
44. Ensure that legal frameworks and policies recognise the importance of the safety of journalists, and human rights defenders, so that these groups of people can work without undue interference, attacks, or intimidation.
45. Ensure that all governmental activity, including law enforcement, is consistent with international human rights obligations, including the protection of the right to privacy, and is conducted on the basis of a legal framework which is publicly accessible, clear, precise, comprehensive and non-discriminatory.
46. The UPR is an important UN process aimed at addressing human rights issues worldwide. It is a rare mechanism through which citizens around the world get to work with the government to improve human rights and hold them accountable to international law. Access Now, Article 19, and Gisa Group are grateful to make this submission.

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