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Joint Stakeholder Submission to the Fourth Cycle of the Universal Periodic Review (UPR) of the Republic of Rwanda

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About the Submitting Organisations

Collaboration on International ICT Policy for East and Southern Africa (CIPESA)

The Collaboration on International ICT Policy for East and Southern Africa (CIPESA) is one of two centres established under the Catalysing Access to Information and Communications Technologies in Africa (CATIA) initiative, which was funded by the UK's Department for International Development (DfID). CIPESA focuses on decision-making that facilitates the use of ICT in support of good governance, human rights and livelihoods.

CIPESA's establishment in 2004 was in response to the findings of the Louder Voices Report for DfID, which cited the lack of easy, affordable and timely access to information about ICT-related issues and processes as a key barrier to effective and inclusive ICT policy making in Africa. As such, our work responds to the shortage of information, resources and actors consistently working at the nexus of technology, human rights and society.

The Pan African Lawyers Union (PALU)

The Pan African Lawyers Union (PALU) is the premier continental membership forum of and for individual African lawyers and lawyers' associations in Africa. It was founded in 2002 by African Bar leaders and eminent lawyers, to reflect the aspirations and concerns of the African people and to promote and defend their shared interests.

Its membership comprises the continent's over five regional lawyers' associations, over 54 national lawyers' associations, and over 1,000 individual lawyers spread across Africa and in the Diaspora, working together to advance the law and the legal profession, the rule of law, good governance, human and peoples' rights and socio-economic development of the African continent.

Introduction

1. Rwanda underwent its third Universal Periodic Review (UPR) in January 2021, during which it received 284 recommendations, of which it accepted 160 and noted 124. Many of these recommendations focused on enhancing civic space, media freedoms, access to information, equality, and the protection of privacy and personal data, areas of particular concern for digital rights.¹ This report provides a review of the status of Rwanda's progress in implementing UPR recommendations relevant to freedom of expression, digital rights, and internet governance.

Updates Since the Last Review

2. Since the last review, Rwanda has taken steps to improve its legal and institutional frameworks. It enacted the Data Protection and Privacy Law (Law No. 058/2021), which provides for the protection of personal data and establishes the Rwanda National Cyber Security Authority (NCSA), which is charged with supervisory authority and oversight over the management of personal data.
3. Rwanda had earlier established the Irembo platform, which buttresses e-government services in the country.² Through the use of the system, citizens can access a wide range of public services, especially applications for identification. The system also facilitates and enhances efficiency, accountability and transparency. Irembo is part of Rwanda's National Strategy for Transformation (NST2) for the period 2024 to 2029.³ The strategy aims to attain 100% access to e-services and to provide every citizen with a unique digital identity by 2030.
4. In a bid to promote digital literacy and inclusion, Rwanda has also established the Digital Ambassadors Programme (DAP), an initiative by the Rwanda Information Society Authority (RISA) to build the digital skills of youth. This enhances citizens' engagement in

¹ United Nations Human Rights Council, 'Report of the Working Group on the Universal Periodic Review: Rwanda' (25 March 2021) UN Doc A/HRC/47/14 <https://docs.un.org/en/A/HRC/47/14>

² Irembo Strengthens Digital Transformation with New Services and Initiatives, <https://support.irembo.gov.rw/en/support/solutions/articles/47001265753-media-brief-for-citizens>

³ INFO, "Rwanda in Tanzania: Rwanda unveils 2nd National Strategy for Transformation (NST2)," <https://www.rwandaintanzania.gov.rw/actualites/info-details/rwanda-unveils-2nd-national-strategy-for-transformation-nst2>

the digital civic space and anticipates a digital literacy goal of 100% by 2029.

5. There have been deliberate efforts by the government to bridge the gender digital divide with a 2024 reach of 96% of female financial inclusion, primarily through the wide embrace and adoption of mobile money.⁴ This initiative aims to extend smartphone ownership and digital financial services by 2026.
6. However, concerns persist regarding the government's heavy-handed approach to online dissent, state surveillance, and restricted access to independent media. Freedom of expression has been degenerating as surveillance has increased in the country.

Freedom of Expression and Opinion

7. During Rwanda's third Universal Periodic Review (UPR) in January 2021, several states, including Germany and Norway, recommended that the country should guarantee the right to freedom of expression and end the harassment and arbitrary detention of journalists and human rights defenders, which has had a chilling effect on freedom of expression and self-censorship.
8. The space for freedom of expression has largely remained constricted with systematic intimidation, harassment, arrests, and detention of government critics and dissidents. Independent journalists and bloggers remain under pressure in the face of an increasingly shrinking digital civic space.⁵ Ambiguous laws on defamation, public order, and national security have been used to target journalists and critics online and offline.⁶
9. There have been similar reports of a systematic crackdown on those perceived by the government to be critics, such as journalists and bloggers. Over the years, several threats, arrests and criminal trials have dominated the media sector, with multiple cases of torture of

⁴ Jessica Agasaro, "Rwanda Achieves 96% financial inclusion for Women, driven by mobile banking growth," The New Times March 10, 2025, <https://www.newtimes.co.rw/article/24695/news/featured/rwanda-achieves-96-financial-inclusion-for-women-driven-by-mobile-banking-growth#:~:text=Rwanda%20achieves%2096%25%20financial%20inclusion,banking%20growth%20%2D%20The%20New%20Times>

⁵ Human Rights Watch, 'Rwanda: Respect Rights During Elections' (14 June 2024) <https://www.hrw.org/news/2024/06/14/rwanda-respect-rights-during-elections>

⁶ Human Rights Watch, Rwanda: End Crackdown on Critics, Journalists, (2022) <https://www.hrw.org/news/2022/10/19/rwanda-end-crackdown-critics-journalists>

victims being reported.⁷

10. In September 2021, Paul Rusesabagina, of the movie “Hotel Rwanda” and a critic of the government, was convicted on allegations of being a member of a terrorist group. During the trial, his phones and conversations were tapped contrary to his rights to privacy and fair trial.⁸
11. There have been systematic cases of targeted attacks against online activists who challenge government narratives and sensitive issues. In May 2021, the Rwanda Investigation Bureau (RIB) arrested journalists over online activism under what was regarded as "spreading rumours intended to cause uprising or unrest among the population."⁹ According to the 2022 Freedom on the Net Report by Freedom House, one of the online commentators was sentenced to 15 years imprisonment over being critical of the COVID-19 lockdown measures through YouTube.¹⁰ Similarly, a YouTuber who made videos about human rights violations by the state authorities in the country was sentenced to seven years in prison.¹¹

Freedom of Information and Censorship of Content

12. While Rwanda passed an Access to Information law in 2013, implementation remains challenging with intensified control over the information sector by the government. Despite the previous review recommendations from states like the Netherlands and Sweden urging Rwanda to improve access to public information and prevent undue censorship, restrictions and curtailment, Rwandan citizens have been denied the enjoyment of their right to information due to non-responsive government authorities to information requests and the culture of secrecy.¹²

⁷ Human Rights Watch, 'World Report 2023: Rwanda' (2023) <https://www.hrw.org/world-report/2023/country-chapters/rwanda>

⁸ Aljazeera, 'Hotel Rwanda' hero given 25-year sentence in 'terrorism' case, (20 September 2021) <https://www.aljazeera.com/news/2021/9/20/rwanda-court-finds-hotel-rwanda-hero-guilty-in-terrorism-case>

⁹ Amnesty International, 'Rwanda: Rights on the Line as Commonwealth Leaders Prepare to Meet' (22 June 2022) <https://www.amnesty.org/en/latest/news/2022/06/rwanda-rights-on-the-line-as-commonwealth-leaders-prepare-to-meet/>

¹⁰ Freedom House, 'Freedom on the Net 2022: Rwanda' (2022) <https://freedomhouse.org/country/rwanda/freedom-net/2022>

¹¹ Ibid.

¹² 'Join Us or Die' Rwanda's Extraterritorial Repression (October 10, 2023), <https://www.hrw.org/report/2023/10/10/join-us-or-die/rwandas-extraterritorial-repression>

13. The enactment of the Law relating to the Protection of Personal Data and Privacy came in as a positive step towards protecting the right to privacy in accordance with regional and international standards. However, several concerns have arisen from its implementation, with a wide range of limitations on accessible information.¹³ Some of its articles, such as article 56, could be used to target journalists and online activists, as well as the sources of their information.
14. The government, through its authorities, took down several websites and other online publications which are run by the Rwanda diaspora community, including exiles, opponents and critics, such as Ireme News and Umubavu TV, due to allegations of spreading rumours or undermining national unity.¹⁴ These measures not only limited information flow but also cut off content. In addition, there has been systematic digital surveillance of journalists, human rights defenders, political critics and opponents.¹⁵ Surveillance has over time instilled fear in online actors and facilitates self-censorship.
15. Akin to limitations on freedom of expression has been the continued crackdown on journalists, commentators and other generators and disseminators of content and information. YouTubers using their channels to disseminate information critical of the government have been severely targeted. Innocent Bahati, a poet, disappeared earlier to the shock of the online fraternity.¹⁶ He was later acquitted but was unlawfully detained over other charges.¹⁷ In March 2021, Agnès Uwimana Nkusi and her son were arrested in connection with material they had posted online, specifically on YouTube, allegedly deemed to be “inciteful of insurrection”.¹⁸

Right to Equal Access and Opportunity

¹³ Freedom House, ‘Freedom on the Net 2022: Rwanda’

<https://freedomhouse.org/country/rwanda/freedom-net/2022>

¹⁴ Freedom House, Freedom on the Net 2023 – Rwanda Country Report,

<https://freedomhouse.org/country/rwanda/freedom-net/2023>.

¹⁵ Amnesty International, ‘Rwanda: Human rights defender and journalists targeted with Pegasus spyware’ (18 July 2021) <https://www.amnesty.org/en/latest/news/2021/07/rwanda-human-rights-defender-and-journalists-targeted-with-pegasus-spyware/>

¹⁶ Rwanda: Investigate and publicly account for the whereabouts of poet Innocent Bahati, Pen International, <https://www.pen-international.org/news/rwanda-investigate-and-publicly-account-for-the-whereabouts-of-poet-innocent-bahati>

¹⁷ Reporters Without Borders, ‘Two Rwandan YouTubers Acquitted After Almost Two Years in Pre-trial Detention’ (13 May 2022) <https://rsf.org/en/news/two-rwandan-youtubers-acquitted-after-almost-two-years-pre-trial-detention>

¹⁸ Amnesty International, ‘Rwanda: Authorities must release mother and son journalists’ (25 March 2021) <https://www.amnesty.org/en/latest/news/2021/03/rwanda-authorities-must-release-mother-and-son-journalists/>

16. In the previous cycle, Canada and Ireland urged Rwanda to address digital gender divides and ensure equal participation in public life. However, targeted online abuse of women activists and female journalists and insufficient protections against cyber harassment remain unaddressed.¹⁹
17. Rwanda still faces inequality in access to digital technologies and online civic space. Women, rural populations, persons with disabilities and marginalised groups continue to experience digital exclusion. Affordability of internet and tech devices is a significant obstacle.²⁰ For instance, smartphone access and penetration stand at 22%, and only 20% of the citizens are actively using mobile internet despite a high broadband coverage of 99%.²¹
18. The cost of internet and data is high in the country due to high taxes. Similarly, high taxes levied on tech gadgets have made access cumbersome, especially for the low-income earners and rural dwellers.²²
19. In January 2024, there was the use of pro-government trolls and AI-generated content to harass and discredit government critics and opponents, especially Diane Rwigara and Victoire Ingabire Umuhiza. These attacks were not only political but also gendered to undermine the public standing of female politicians.²³ In Ingabire's case, AI-generated content falsely portrayed her as being affiliated with rebel groups operating in the Democratic Republic of the Congo (DR Congo).²⁷
20. The IremboGov platform which is the cornerstone of Rwanda's e-government services, remains largely inaccessible to persons with audio and visual impairments. The

¹⁹ International Centre for Journalists, 'The Chilling: A Global Study on Online Violence Against Women Journalists' (UNESCO 2022) <https://www.icfj.org/our-work/chilling-global-study-online-violence-against-women-journalists>

²⁰ All Africa, "Central Africa: Rwanda Reaches 38 Percent Internet Penetration but Faces Cost Hurdles," <https://allafrica.com/stories/202506170578.html>

²¹ International Centre for Tax and Development, "Bridging the divide: Rwanda's quest for equitable digital governance," May 30, 2025, <https://www.ictd.ac/blog/bridging-the-divide-rwandas-quest-for-equitable-digital-governance/>

²² Grace Ashiru, "Internet Use Surges in Rwanda but Affordability Holds Many Back," <https://www.techinafrica.com/internet-use-surges-in-rwanda-but-affordability-holds-many-back/>

²³ Freedom House, 'Rwanda: Freedom on the Net 2024 Country Report' (Freedom House 2024) <https://freedomhouse.org/country/rwanda/freedom-net/2024>

platform, which is designed for efficiency, has instead perpetrated exclusion.²⁴

Right to Data Protection and Privacy on the Internet

21. Despite the enactment of Law No. 058/2021 of 13/10/2021 relating to the Protection of Personal Data and Privacy to guarantee protection and privacy of personal data, the law is widely criticised as weak and of falling short of providing strong provisions on judicial oversight, redress mechanisms, and transparency in the conduct of government surveillance.
22. There are various allegations of use of the NSO Group's Pegasus spyware to target individuals in online spaces.²⁵ Key targets include Carine Kanimba, the daughter of Paul Rusesabagina, the "Hotel Rwanda" hero who was detained, tried and convicted on various charges.²⁶
23. There are also multiple reports of surveillance on journalists who potentially face threats, intimidation, arrest, prosecution and lengthy prison sentences.²⁷ This is made possible by enhanced surveillance using spyware and closed-circuit television cameras that have been installed across the country. While surveillance may be justified, it should not be used wantonly against the citizens and must comply with international and domestic legal standards.

²⁴ Rwanda Union of the Blind, 'Rwanda Union of the Blind Calls for Urgent Digital Accessibility Reforms to Empower Visually Impaired Citizens' (RUB, 23 May 2025) <https://rubrwanda.rw/rwanda-union-of-the-blind-calls-for-urgent-digital-accessibility-reforms-to-empower-visually-impaired-citizens/>

²⁵ Forbidden Stories, 'The Pegasus Project' (2021) <https://forbiddenstories.org/case/the-pegasus-project/>

²⁶ Organised Crime and Corruption Reporting Project, 'Israeli Spy Tech Used Against Daughter of Man Who Inspired "Hotel Rwanda"' (19 July 2021) <https://www.occrp.org/en/the-pegasus-project/israeli-spy-tech-used-against-daughter-of-man-who-inspired-hotel-rwanda>

²⁷ Amnesty International, 'Rwanda: Human Rights in Rwanda' (2024) <https://www.amnesty.org/en/location/africa/east-africa-the-horn-and-great-lakes/rwanda/report-rwanda/>

Recommendations

- Decriminalise defamation and review vague laws used to suppress freedom of expression and peaceful dissent.
- Establish independent oversight over surveillance practices and introduce judicial safeguards to protect privacy.
- Strengthen the implementation of the Access to Information law and ensure that public bodies proactively disclose information.
- Enhance the capacity of the NCSA to enforce data protection while ensuring its independence from executive interference.
- Promote inclusive digital access, especially for women, persons with disabilities, and rural communities.
- Cease censorship and arbitrary removal of online content, and establish transparent mechanisms for content moderation.
- Foster safe online spaces for journalists and human rights defenders, including legal support against online harassment.
- Establish a favourable and safe environment for the operations of human rights defenders, journalists, and other online activists, rather than persecuting them by repealing or amending laws to provide for more progressive provisions.
- Prohibit and penalise tech-facilitated gender based violence, especially against women and ensure their access to timely and effective redress.
- Try all accused persons in open courts to ensure that they get justice.
- Investigate all cases of enforced disappearance, ensuring punishment for any perpetrators and justice for survivors and their family members.
- Make strong and repeated public statements at the highest government levels, clearly stating that all law enforcement authorities and investigation agencies must comply with the law, and that all detained individuals must be brought to court within 24 hours.
- Embrace universal design and ensure its full integration into the IremboGov platform to cater for and ensure that persons with disabilities, especially those with visual impairments, have full access to all of its services.