
FREEDOM OF EXPRESSION AND DIGITAL RIGHTS IN RWANDA

UNIVERSAL PERIODIC REVIEW SUBMISSION SESSION 51, 4TH CYCLE

SUBMITTING ORGANISATIONS

Small Media Foundation is a UK-based organisation that works to support the free flow of information in politically closed societies. The non-profit engages in research, advocacy, and training activities to support global advocates to uphold citizens' rights to freedom of expression and access to information. The Uproar programme is a Small Media initiative championing digital rights in over 34 countries across Africa, MENA region and Central Asia through the Universal Periodic Review.

The Collaboration on International ICT Policy for East and Southern Africa (CIPESA) works to defend and expand the digital civic space to enable the protection and promotion of human rights and to enhance innovation and sustainable development. CIPESA's work responds to a shortage of information, research, resources, and actors consistently working at the nexus of technology, human rights, and society. Indeed, 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 key barriers to effective and inclusive ICT policy-making in Africa.

ARTICLE 19 (A19) is an NGO in Special Consultative Status with ECOSOC. Founded in 1987, the organisation draws its mandate from Article 19 of the Universal Declaration of Human Rights, to promote and protect the fundamental rights of freedom of expression and access to information with a belief that the full enjoyment of these rights is vital for the realisation of other fundamental rights and freedoms. ARTICLE 19 works globally through nine regional hubs, including in Uganda, through the ARTICLE 19 Eastern Africa hub based in Kenya.

University of Birmingham is a public research university based in Birmingham, England. Part of the prestigious Russell Group and founded in 1825, is part of an international network of research universities focussing on science and the humanities.

INTRODUCTION

1. The Universal Periodic Review (UPR) is an important UN mechanism aimed at addressing human rights issues in its member states. Small Media, ARTICLE 19, The Collaboration on International ICT Policy for East and Southern Africa (CIPESA) and the University of Birmingham welcome the opportunity to contribute to Rwanda's fourth review cycle.
2. This report evaluates Rwanda's progress on digital rights, including freedom of expression, press freedom, access to information and privacy since its third review in January 2021. It analyzes the recommendations from the third UPR Working Group report¹ and assesses the government's UPR Implementation Roadmap 2021–2026.²
3. During its third review, Rwanda received 35 recommendations on freedom of expression, information, and media freedom.³ Of these, the government accepted 14 and noted 16. Some of the accepted recommendations pertained to strengthening media pluralism and the safety of journalists through legal reforms. However, recommendations to amend the Penal laws to repeal vague offenses on "spreading false information" and insults against the President, to broaden the legal definition of journalist to include bloggers, and to establish guarantees for an independent media regulator were rejected.
4. Since 2022, Rwanda has been engaged in a media policy review process.⁴ However, delays in finalizing and adopting the new policy have raised concerns among stakeholders. Parliament, civil society organizations and international partners have

¹ UN. Human Rights Council. Working Group on the Universal Periodic Review (37th sess. : 2021 : Geneva), ed., *Report of the Working Group on the Universal Periodic Review: Rwanda*, Universal Periodic Review. Outcome Document (Geneva: UN, 2021), <https://digitallibrary.un.org/record/3926274>.

² "Publications," accessed June 25, 2025, https://www.minijust.gov.rw/publications?tx_filelist_filelist%5Baction%5D=list&tx_filelist_filelist%5Bcontroller%5D=File&tx_filelist_filelist%5Bpath%5D=%2Fuser_upload%2FMinijust%2FPublications%2FReports%2FUPR%2F&cHash=c5ae3ac25bda7b861518521cad6eeb5c.

³ "Rwanda: Accept and Implement UPR Recommendations on Freedom of Expression," *ARTICLE 19* (blog), February 2, 2021, <https://www.article19.org/resources/rwanda-accept-and-implement-upr-recommendations/>.

⁴ Hudson Kuteesa, "Inside Rwanda's New Proposed Media Policy," *The New Times*, November 20, 2024, <https://www.newtimes.co.rw/article/21975/news/rwanda/inside-rwandas-new-proposed-media-policy>.

consistently urged the government to expedite its adoption⁵ to pave the way for much-needed legal and institutional reforms that strengthen media freedom and regulatory clarity.⁶

5. Despite some positive steps, such as new legislation on data protection⁷ and repealing of some legislations,⁸ Rwanda continues to severely restrict online and offline expression, resulting in a repressed civic space.⁹
6. Over the period since its third review, Rwanda has fallen short of fully implementing many of the recommendations related to freedom of expression online and offline. Legal reforms have been minimal, and the on-the-ground reality for journalists, activists, and ordinary citizens voicing opinions remains repressive.¹⁰ The government's UPR Implementation Roadmap contained promising commitments, but progress is undermined by patterns of censorship, intimidation, and impunity for abuses. This stakeholder report finds that Rwanda has not yet delivered on key pledges. Space for dissent has not expanded; harassment of journalists continues unabated, surveillance practices threaten privacy and free expression, and access to information, while nominally supported, is stalled in practice.¹¹
7. According to the obligations that Rwanda accepted as a signatory to the International Covenant on Civil and Political Rights (ICCPR), such restrictions must pass the cumulative, 3-part test of being; provided by law, for legitimate purposes, and be minimal, necessary, and, proportional.¹²

⁵ KT Press Staff Writer, "Parliament Gives Prime Minister Six Months to Approve Media Policy," KT PRESS (blog), April 29, 2025, <https://www.ktpress.rw/2025/04/parliament-gives-prime-minister-six-months-to-approve-media-policy/>.

⁶ "Comparative Analysis of Media Laws and Policies in EAC.Pdf," accessed June 26, 2025, <https://www.legaidrwanda.org/includes/pdf/research/Comparative%20Analysis%20of%20Media%20Laws%20and%20Policies%20in%20EAC.pdf>.

⁷ "Law No. 058/2021 of 13 October 2021 Relating to the Protection of Personal Data and Privacy | Legal-Research," DataGuidance, accessed June 26, 2025, <https://www.dataguidance.com/legal-research/law-no-0582021-13-october-2021-relating>.

⁸ "Why Supreme Court Decriminalised Humiliation of Foreign Officials," The New Times, July 8, 2022, <https://www.newtimes.co.rw/article/201101/News/why-supreme-court-decriminalised-humiliation-of-foreign-officials>.

⁹ "Rwanda: Freedom on the Net 2023 Country Report," Freedom House, accessed June 26, 2025, <https://freedomhouse.org/country/rwanda/freedom-net/2023>.

¹⁰ 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>

¹¹ Freedom House, Freedom on the Net 2023 – Rwanda Country Report, <https://freedomhouse.org/country/rwanda/freedom-net/2023>.

¹² <https://www.ohchr.org/en/instruments-mechanisms/instruments/international-covenant-civil-and-political-rights>

UPDATES SINCE LAST UPR REVIEW

8. Despite commitments to revise laws inconsistent with freedom of expression and digital rights during the third UPR, Rwanda still criminalizes speech under the Penal Code. Offenses like the spread of “false information or harmful propaganda with intent to cause a hostile international opinion”¹³ against Rwanda, criminal insult and defamation of the President¹⁴ and publication of rumours “that may make a person lose their credibility” under the Cybercrime law¹⁵ are still being used to prosecute journalists, bloggers and other critics.
9. An attempt to challenge Article 39 of the Cybercrime Law, which criminalizes the publication of rumors, was dismissed by the Supreme Court in June 2025,¹⁶ thereby reinforcing the state’s position on the criminalization of defamation-like offenses.
10. On a positive note, a comprehensive Data Protection and Privacy Law was enacted on 15 October 2021¹⁷ making Rwanda the 35th African country with a data protection statute.¹⁸ This fulfilled a pledge in the UPR roadmap to strengthen privacy protections and was influenced by Rwanda’s earlier ratification of the African Union’s Malabo Convention on Cyber Security and Personal Data Protection.¹⁹
11. The new law aims to give individuals control over personal data and regulate data processing by public and private entities. Key provisions include requirements for data controllers to register with the National Cyber Security Authority, mandates for breach notification, limits on cross-border data transfers without the approval

¹³ “Law Determining Offences and Penalties in General,” September 27, 2018, <https://rwandalii.org/akn/rw/act/law/2018/68/eng@2018-09-27>.

¹⁴ “Law Determining Offences and Penalties in General.”

¹⁵ “Law on Prevention and Punishment of Cybercrimes,” September 25, 2018, <https://rwandalii.org/akn/rw/act/law/2018/60/eng@2018-09-25>.

¹⁶ Hudson Kuteesa, “Why Supreme Court Rejected Lawyer Ibambe’s Petition against Cybercrime Law,” The New Times, June 5, 2025, <https://www.newtimes.co.rw/article/27013/news/law/why-supreme-court-rejected-lawyer-ibambes-petition-against-cybercrime-law>.

¹⁷ “Law No. 058/2021 of 13 October 2021 Relating to the Protection of Personal Data and Privacy | Legal-Research.”

¹⁸ “Navigating Rwanda’s New Data Protection Law,” accessed June 26, 2025, <https://www.darkreading.com/cyber-risk/navigating-rwanda-new-data-protection-law>.

¹⁹ “The African Union Convention on Cyber Security and Personal Data Protection: Key Insights - Centre for Intellectual Property and Information Technology Law,” July 24, 2023, <https://cipit.strathmore.edu/the-african-union-convention-on-cyber-security-and-personal-data-protection-key-insights/>.

of the National Cyber Security Authority (NCSA), and data localization.²⁰ According to Articles 48 and 49 of this law, personal data cannot be transferred outside Rwanda unless the data controller or processor obtains prior written authorization from the NCSA and a number of conditions are set out prior approval.

12. The Data Law became fully enforceable in October 2023, bolstering the right to privacy online. However, observers have noted concerns like the data localization requirement, could facilitate governmental control over data and pose “a threat to media sites” that host data abroad.²¹ Other concerns include the independence of the NCSA and arbitrary surveillance, as will be enunciated in this submission.
13. Despite accepting more general calls to encourage the exercise of an independent media, the government has not moved to update the Media Law as per international standards. This gap between UPR pledge and action is evident in the continuing criminalization of critical bloggers, including charging them with impersonating journalists.²²
14. Notably, Rwanda rejected Canada’s recommendation to amend Article 2(19) of the Media Law to broaden the definition of journalist to include citizen journalists and bloggers. The current law’s narrow definition excludes many online content creators, leaving them without legal protections afforded to recognized professional journalists. This has led to the prosecution and sentencing of *Dieudonné Niyonsenga*, also known as *Cyuma Hassan*, a vlogger and operator of *Ishema TV*, on charges that included impersonating a journalist and obstructing public order.²³
15. *Cyuma Hassan*, was first arrested in April 2020 after publishing videos criticizing the mistreatment of civilians by security forces during Rwanda’s COVID-19 lockdown. He was accused of impersonating a journalist, as he lacked accreditation from Rwanda Media Commission (RMC), relying instead on a press card issued by his platform, *ISHEMA TV*. In March 2021, the Intermediate Court of Gasabo

²⁰ “Overview of Rwanda’s Data Protection Law,” *Securiti* (blog), accessed June 26, 2025, <https://securiti.ai/rwanda-data-protection-law/>.

²¹ “Rwanda: Freedom on the Net 2021 Country Report,” Freedom House, accessed June 25, 2025, <https://freedomhouse.org/country/rwanda/freedom-net/2021>.

²² “Rwanda: Wave of Free Speech Prosecutions | Human Rights Watch,” accessed June 26, 2025, <https://www.hrw.org/news/2022/03/16/rwanda-wave-free-speech-prosecutions>.

²³ “Dieudonné Niyonsenga,” Committee to Protect Journalists (blog), accessed June 26, 2025, <https://cpj.org/data/people/dieudonne-niyonsenga/>.

acquitted him of all charges. However, the Prosecution appealed, and in November 2021, the High Court sentenced him to seven years in prison and a fine of 5 million Rwandan Francs, finding him guilty of impersonation, obstruction of public security, publication of false information, and humiliation of public officials. He appealed to the Court of Appeal, arguing that his conviction violated his freedom of expression and that he was acting as a journalist in the public interest. In January 2023, the Court of Appeal upheld the High Court's decision, ruling that his self-identification as a journalist without RMC accreditation constituted impersonation and that his reporting amounted to incitement and disruption of public order.

16. The UPR Implementation Roadmap 2021–2026²⁴ outlines actions such as reviewing laws that undermine freedom of expression and ensures compliance with the access to information law. Apart from the repeal of the provision criminalizing humiliation or insult against foreign Heads of State or representatives of foreign states or international organizations in Rwanda in 2021,²⁵ no further reforms have been undertaken to address other statutory provisions that are frequently invoked to restrict freedom of expression.
17. The Rwandan government has instead maintained that existing laws are sufficient and that restrictions target only speech violating public order or dignity. For example, Rwanda's delegation asserted at the third UPR that national laws on genocide ideology are needed to combat hate speech. While this aim is legitimate, broad or vague formulations of these laws continue to be misused against critics, indicating no reform to narrow their scope.
18. Their continued use is also inconsistent with the African Commission on Human and Peoples' Rights (ACHPR) Resolution 169,²⁶ which calls on states to repeal criminal defamation and insult laws. The 2019 Declaration of Principles on Freedom of Expression and Access to Information in Africa also urges states to decriminalise publication of "false news," recognising that such offences are frequently misused

²⁴ "Publications," accessed June 25, 2025,

https://www.minijust.gov.rw/publications?tx_filelist_filelist%5Baction%5D=list&tx_filelist_filelist%5Bcontroller%5D=File&tx_filelist_filelist%5Bpath%5D=%2Fuser_upload%2FMinijust%2FPublications%2FReports%2FUPR%2F&cHash=c5ae3ac25bda7b861518521cad6eeb5c.

²⁵ Portal of Rwandan Laws and Case Laws, "Re BYANSI," December 24, 2021,

https://amategeko.gov.rw/view/doc_case/RS%252FINCONST%252FSPEC%252000002%252F2021%252FSC.

²⁶ "African Commission on Human and Peoples' Rights (ACHPR) Resolution on Repealing Criminal Defamation Laws in Africa - ACHPR/Res.169(XLVIII)10," July 16, 2025, <https://achpr.au.int/en/adopted-resolutions/169-resolution-repealing-criminal-defamation-laws-africa-achprres169xlvi>

to suppress legitimate journalism and criticism.²⁷

19. In 2021, the UN Special Rapporteur on freedom of expression further emphasised that criminalising “false news” is “disproportionate, ineffective, and can erode trust in public institutions.”. Instead, efforts to counter disinformation should focus on promoting media diversity, strengthening independent journalism, and ensuring open, accurate, and evolving communication with the public. A free, independent, and pluralistic media environment is the most effective safeguard against disinformation and harmful propaganda.²⁸

FREEDOM OF EXPRESSION AND OPINION

20. Article 38 of Rwanda’s constitution stipulates that “freedom of press, of expression and of access to information are recognised and guaranteed by the State”. However, it further states that “freedom of expression and freedom of access to information shall not prejudice public order, good morals, the protection of the youth and children, the right of every citizen to honour and dignity and protection of personal and family privacy”.²⁹
21. Rwanda’s media landscape is tightly controlled by the state, and journalists, particularly those investigating sensitive issues or critical of authority, face intimidation, legal harassment, and even violence.³⁰ Since the third review, this trend has unfortunately continued or worsened, despite the government’s commitment to “protect journalists against harassment and intimidation”, and to “enable journalists to work freely, without fear of retribution”. There remains a gap between these commitments and reality on the ground.
22. Rwanda has a self-regulatory body, the Rwanda Media Commission set up in 2013 to handle media ethics and accreditation, and a government agency, the Rwanda Governance Board which oversees media outlets’ registration and issues press cards. In practice, media regulation is controlled by the government with limited

²⁷ “2019 Declaration of Principles on Freedom of Expression and Access to Information in Africa,” July 16, 2024.

<https://achpr.au.int/en/adopted-resolutions/169-resolution-repealing-criminal-defamation-laws-africa-achprres169xlvii>

²⁸ “United Nations Human Rights Council. (2021). Disinformation and freedom of opinion and expression: Report of the Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression, Irene Khan (A/HRC/47/25).” July 16, 2025.

<https://undocs.org/A/HRC/47/25>

²⁹ “Constitution of the Republic of Rwanda -”, accessed June 27, 2025, <https://nec.gov.rw/en/constitution-of-the-republicof-rwanda/>.

³⁰ “Rwanda: Freedom on the Net 2023 Country Report,” Freedom House, accessed June 26, 2025, <https://freedomhouse.org/country/rwanda/freedom-net/2023>.

independence especially if a media house is seen as crossing political red lines. In such situations, the Media Commission has limited powers to protect the media from governmental sanction.

23. The major online and broadcast media in Rwanda are either state-run or largely pro-government. There are no longer any outspoken independent newspapers; the few private outlets often practice self-censorship. One of Rwanda's last remaining investigative publications, *The Chronicles*, attempted to cover sensitive political and governance issues but reportedly faced intimidation. Its founder, Dr. Christopher Kayumba, was arrested and charged with rape in 2021,³¹ a move widely seen by press freedom advocates as politically motivated. He was later acquitted in 2023.³² Many journalists from earlier independent papers like *Umuseso* and *Umuwugizi* are in exile.³³
24. Rwanda's media pluralism is therefore very restricted, a concern highlighted by Czechia's UPR recommendation to "strengthen media pluralism and the safety of journalists". According to Reporters Without Borders, Rwanda's media landscape "is one of the poorest in Africa" after decades of repression, with television and radio either state-owned or controlled by regime allies. Under the 2025 Reporters Without Borders (RSF) Press Freedom Index, Rwanda is ranked 146th out of 180 countries, with an overall score of 35.84 out of 100, a decline from its 2024 ranking of 144th.³⁴ Online media, blogs and YouTube channels, have provided a new avenue for pluralism, but those are now under direct attack.

HARASSMENT, ARRESTS, AND PROSECUTIONS

25. Over the last five years, journalists and bloggers who voice dissent have been systematically harassed. Authorities have frequently used trumped-up criminal charges to imprison journalists, often invoking laws related to national security, public order, or genocide ideology.

³¹ "Dr. Kayumba Arrested," IGIHE, September 9, 2021, <https://en.igihe.com/news/article/dr-kayumba-arrested>.

³² Agence France-Presse, "Rwanda Oppo's Kayumba Acquitted," Voice of America, February 22, 2023, <https://www.voaafrica.com/a/rwanda-oppo-s-kayumba-acquitted/6974327.html>.

³³ Sam Biden, Silenced Critics – The Repression of Journalism in Rwanda, Human Security Centre, 2023, <https://www.hscentre.org/africa/silenced-critics-repression-journalism-rwanda/>.

³⁴ "Index | RSF," July 10, 2024, <https://rsf.org/en/index>.

26. A clear pattern has emerged, noted by multiple human rights groups. YouTubers and online commentators are currently targets of repression. Human Rights Watch reported a spate of cases in 2020–2021 where at least eight YouTube commentators were detained or prosecuted for content critical of the government.³⁵ The Commonwealth Heads of Government Meeting hosted by Rwanda in June 2022 perhaps provided some impetus for the regime to silence critical voices in the lead-up as it sought to prevent embarrassment on the international stage.

- a. **Yvonne Idamange:** A prominent YouTube commentator and genocide survivor who posted videos denouncing what she saw as the government's authoritarianism and exploitation of the genocide's memory, was arrested in February 2021. In October 2021, Idamange was convicted on six counts including "inciting violence and insurrection, denigrating genocide memorials, spreading rumors, and assault", and sentenced to 15 years in prison.³⁶
- b. **Théoneste Nsengimana:** A journalist who ran *Umubavu TV*, an independent YouTube channel featuring opposition views, was arrested in October 2021 while planning to cover the opposition event "Ingabire Day". He was charged with "membership in a criminal group," "spreading false information with intent to create hostile opinion against the government," "inciting unrest," and "spreading rumors."³⁷ As of mid-2025, Nsengimana remained in detention awaiting a court verdict. In a related development, opposition leader Victoire Ingabire Umuhiza was also arrested in June 2025.³⁸ She is expected to be prosecuted alongside Nsengimana in the same case, raising further concerns about the criminalization of peaceful

³⁵ "Rwanda: Arrests, Prosecutions over YouTube Posts | Human Rights Watch," March 30, 2021, <https://www.hrw.org/news/2021/03/30/rwanda-arrests-prosecutions-over-youtube-posts>.

³⁶ "Rwandan Govt Critic on YouTube Sentenced to 15 Years | Africanews," accessed June 27, 2025, <https://www.africanews.com/2021/10/01/rwandan-govt-critic-on-youtube-sentenced-to-15-years/>.

³⁷ "Théoneste Nsengimana," *Committee to Protect Journalists* (blog), accessed June 27, 2025, <https://cpj.org/data/people/theoneste-nsengimana/>.

³⁸ "Rwanda: Opposition Leader Arrested | Human Rights Watch," accessed June 27, 2025, <https://www.hrw.org/news/2025/06/24/rwanda-opposition-leader-arrested>.

political expression and journalistic activity.

- c. **Aimable Karasira:** A former university lecturer turned YouTuber, Karasira was known for criticizing official narratives on sensitive historical and social issues. He was arrested in May 2021 and later charged with “genocide denial” and “divisionism” based on his YouTube commentary. Karasira’s trial has been protracted, and he has reportedly been held in poor conditions with deteriorating health. His case exemplifies how genocide ideology laws, are also used to silence controversial opinions.
- d. **John Williams Ntwali of Pax TV and Ireme News:** One of Rwanda’s remaining investigative journalists, Ntwali repeatedly exposed human rights abuses on his YouTube channel and in print.³⁹ He received frequent threats and knew he was at risk. In January 2023, he died under suspicious circumstances, in a car “accident”. The police provided no precise location or photo evidence, and conducted a hasty, closed trial of the driver who was swiftly convicted of manslaughter.⁴⁰ Dozens of press freedom groups have urged an independent inquiry, to no avail.⁴¹ Ntwali’s death has had a devastating chilling effect on journalists who fear to do their work.⁴²
- e. **Three IWACU TV journalists:** In October 2018, three journalists from the YouTube-based Iwacu TV: Damascene Mutuyimana, Shadrack Niyonsenga, and Jean Baptiste Nshimiyimana, were arrested and charged with spreading false information and inciting unrest. They spent nearly four years in pre-trial detention, during which prosecutors sought prison sentences of over 22 years. On October 5, 2022, a Kigali court acquitted and released them, citing lack of evidence. Their prolonged detention without conviction drew widespread criticism and underscored the risks faced by digital journalists in Rwanda.⁴³

³⁹ “Questions Remain Over Rwandan Journalist’s Suspicious Death | Human Rights Watch,” July 18, 2023, <https://www.hrw.org/news/2023/07/18/questions-remain-over-rwandan-journalists-suspicious-death>.

⁴⁰ “Questions Remain Over Rwandan Journalist’s Suspicious Death | Human Rights Watch.”

⁴¹ “Rwanda: Following Questionable Trial on the Death of a Journalist, RSF and 85 Organizations Reiterate Call for an Independent Investigation | RSF,” March 15, 2023, <https://rsf.org/en/rwanda-following-questionable-trial-death-journalist-rsf-and-85-organizations-reiterate-call>.

⁴² “Questions Remain Over Rwandan Journalist’s Suspicious Death | Human Rights Watch,” July 18, 2023.

⁴³ “Rwandan Court Acquits, Releases 3 Iwacu TV Journalists,” *Committee to Protect Journalists* (blog), October 5, 2022, <https://cpj.org/2022/10/rwandan-court-acquits-releases-3-iwacu-tv-journalists/>.

- f. **Jean Paul NKUNDINEZA:** Freelance journalist, Nkundineza was arrested in October 2023, charged with public insult, harassment of a whistleblower, threats, and disseminating false information, stemming from a video in which he implicated a former Miss Rwanda in wrongdoing against a previous pageant winner. In April 2024, a court convicted him of public insult and defamation, sentencing him to three years in prison plus a fine of one million Rwandan francs. His case, which centered on his critical online reporting, illustrates the ongoing risks faced by digital journalists in Rwanda.⁴⁴

FREEDOM OF INFORMATION AND CENSORSHIP OF CONTENT

WEBSITE BLOCKING AND CONTENT FILTERING

27. The Rwandan authorities continue to censor online content deemed critical of the government. Independent news websites operated by critical voices including the websites of *Inyenyeri News*, *The Rwandan*, and *Le Prophete*, and blogs, such as Rugali are blocked.⁴⁵ Ugandan -based newspapers and regional independent outlets are also blocked, including the *Great Lakes Voice*, *The Daily Monitor*, *The Independent*, *ChimpReports*, *Nile Post*, and *SoftPower News*, despite the country making commitments in August 2019 to lift such bans. These platforms were initially blocked during the diplomatic tensions between Rwanda and Uganda and remain inaccessible to users within Rwanda.⁴⁶
28. Users in Rwanda can only reach these sites via proxies or VPNs. Decisions appear to be made extra-judicially by state agencies, as there is no transparency or public list of banned sites, nor clear legal process for blocking.
29. The BBC's Kinyarwanda/Kirundi service, suspended in 2014 following a controversial documentary that angered Rwandan authorities, remains off air. Despite several UPR recommendations urging the government to lift such restrictions, Rwanda has not restored access.

⁴⁴ "Rwanda: Freedom on the Net 2024 Country Report," Freedom House, accessed June 27, 2025, <https://freedomhouse.org/country/rwanda/freedom-net/2024>.

⁴⁵ "Rwanda: Freedom on the Net 2022 Country Report," Freedom House, accessed June 26, 2025, <https://freedomhouse.org/country/rwanda/freedom-net/2022>.

⁴⁶ "Rwanda and Uganda Agree to Unblock News Sites," The Citizen, April 10, 2021, <https://www.thecitizen.co.tz/tanzania/news/national/rwanda-and-uganda-agree-to-unblock-news-sites-2690158>.

CONTROL OF SOCIAL MEDIA AND VIDEO PLATFORMS

30. *YouTube, Facebook, and other global platforms are accessible, but the government monitors and polices online speech on these platforms with regulatory measures and punitive actions under the Cyber-Crime law of 2018. YouTube, in particular, is a platform that Rwandans use for independent journalism and blogging. Human Rights Watch (HRW) documented at least “eight people reporting or commenting on current affairs on YouTube threatened, arrested, or prosecuted” between 2020–2021.*⁴⁷
31. In December 2024, the Rwanda Investigation Bureau (RIB) detained seven YouTube journalists publishing for different channels for several days.⁴⁸ No formal charges were disclosed, and the detainees were reportedly denied access to legal counsel and were not brought before a court within the legally required timeframe. According to local reports, the journalists were warned about the content of their publications before being released.⁴⁹
32. Individuals who have spoken critically of the government have also gone missing. Human Rights Watch reported that a poet Innocent Bahati, who published poems critical of the state on YouTube, disappeared in February 2021 under mysterious circumstances.⁵⁰ Kofi Gakwandi, a Rwandan content creator and government critic, also went missing in late 2023.⁵¹ Local news allege that his disappearance may be linked to his outspoken commentary on YouTube regarding security forces and

⁴⁷ “Rwanda: Arrests, Prosecutions over YouTube Posts | Human Rights Watch,” March 30, 2021, <https://www.hrw.org/news/2021/03/30/rwanda-arrests-prosecutions-over-youtube-posts>.

⁴⁸ “Man Of the Match🏆 on Instagram: ‘BREAKING NEWS📢 Umuvugizi Wa RIB Yirinze Kugira icyo Atangaza Kuri Bamwe Mubakoresha Imbuga Nkoranyambaga (YouTube) Bafunzwe Kuva Kuwa 3 Wicumweru Gishize! Amakuru Avuga Ko Hatawe Muri Yombi Sandrine (Gasaro TV), Camarade (3D TV Rwanda), Onika (3D TV Rwanda), Beno View, Uwari Watangaje Ko Ari Umugabo Wa Jacky, Slim Jesus(Slim Jesus), Nabandi Bataramenyekana. Kugeza Ubu Ntawuzi icyo Bakurikiranyweho Cyanyacyo Ariko Amakuru Akaba Avuga Ko Batawe Muri Yombi Hashingiwe Mukuba Baritabiriye Umuhango Wo Gushyingura Impeta Ya Jacky, Ndetse Nibindi Bivugwa Ko Bakurikiranyweho Kuba Barahaye Ijambo (Interview) Jacky Mubihe Bitandukanye Kandi Afite Uburwayi Bwo Mumutwe. Kuri Ubu Ntawe Uzi Aho Bafungiyeye. Kugera Ejo Hashize Le 15.12.2024 Saa 21:07 z’Umugoroba Nandikiye Umuvugizi Wa RIB Dr. Murangira Ariko Kugera Ubu Ntango Aransubiza. Amakuru Avuga Ko Camarade Na Onika Bafatiye Great Hotel Mu Kiyovu, Sandrine Gasaro TV We Yagiye Agiye Kuri RIB Kugisha Inama Yuko Yakitwara Birangira Bamusigaranye, Beno View Yafatiye Iwe Murugo, Nabandi!!!!. Iyi Nkuru Ndacyari Kuyikurikira. VIDEO YOSE YAGEZE KURI YOUTUBE YA DC TV RWANDA,’” Instagram, December 17, 2024, <https://www.instagram.com/dcclement17/reel/DDrUyftonJG/>.

⁴⁹ NO Media house was allowed to publish about, but we reached out to some of the detained journalists and confirmed the arrest and detention after.

⁵⁰ “Rwanda: Freedom on the Net 2024 Country Report,” Freedom House, accessed June 26, 2025, <https://freedomhouse.org/country/rwanda/freedom-net/2024>.

⁵¹ *Aho Kofi Waburiwe Irengero Ari n’icyo Yazize Biri Kwibazwaho/Kuvuga Kuri Burundi-DRC&Uganda/Aboneke*, 2024, https://www.youtube.com/watch?v=B8VB1zu_QYI.

governance.

33. The social media online publishing platform, *Medium* is currently blocked by authorities. While the reason and dates of exact blocking is not specified, some reports note that this dates from earlier in 2013.⁵²
34. Meanwhile, the ruling party's extensive influence on social media continues to grow through pro-government commentators online, who are referred to as the "Twitter Brigade". Government officials also counter international media narratives by promoting an internal version of events. Such campaigns include #TuriKumwe and #RwandaWorks.
35. In the recent context of escalating regional tensions, particularly Rwanda's alleged backing of the M23 rebel group in the Democratic Republic of the Congo, the Rwandan government has intensified its control over media and social media, only pro government outlets were allowed to report on ground including access to areas seized by the M23.⁵³

INTERNET SHUTDOWNS AND NETWORK DISRUPTIONS

36. The Rwanda government has not implemented a nationwide internet blackout during the period under review, a point often cited by authorities as a sign of commitment to connectivity. However, some features like ads on YouTube have been suspended since March 2021. The government denied having played any role in the suspension; however, users and content creators have pointed it out as a concern. Reports suggest that the move aligns with efforts to block uncontrolled content, as advertisements may originate from unsolicited sources, including government critics.⁵⁴
37. While no confirmed large-scale shutdowns have occurred, the legal framework allows the government to do so. Article 127 of the 2016 ICT Law empowers the minister in charge to suspend any electronic communications service or network

⁵² <https://2009-2017.state.gov/j/drl/rls/hrrpt/humanrightsreport/index.htm?safe=1#wrapper>

⁵³ "Human Rights Watch. (2025). DR Congo: Rwanda-backed M23 target journalists, activists." July 17, 2025.
<https://www.hrw.org/news/2025/03/12/dr-congo-rwanda-backed-m23-target-journalists-activists>

⁵⁴ <https://rwandatoday.africa/rwanda/news/youtube-ad-suspension-in-rwanda-leaves-content-creative-pockets-empty-3541796>

operations⁵⁵ for an undetermined period for various broad reasons. Rwanda's record so far is positive on avoiding blunt shutdowns, but the latent capability and legal allowance for such measures remain concerns.

EXTENT OF INTERNET PENETRATION

38. Rwanda has invested comprehensively in ICT and boasts high rates of broadband coverage with over 90% of the population living in areas with broadband signal.⁵⁶ As of the first quarter of 2025, internet penetration in Rwanda was reported at 69.3% of the population, according to the Rwanda Utilities Regulatory Authority's ICT Sector Statistics Report.⁵⁷ However, most users rely on mobile internet, given limited fixed broadband adoption.⁵⁸ Rwanda's Smart Nation agenda, a national strategic initiative aimed at transforming Rwanda into a knowledge-based society and positioning it as a leading ICT hub in Africa, has expanded connectivity and digital services. However, alongside this digital growth, the government has tightened control over online content and discourse, resulting in a "Not Free" classification in Freedom House's Freedom on the Net 2024 index, scoring 36/100. Internet freedom in Rwanda has declined in recent years.⁵⁹
39. The cost of internet remains expensive. The country does not meet the International Telecommunication Union's benchmark target according to which the costs of entry-level broadband services (i.e. 2GB of mobile broadband data) should not exceed 2 per cent of monthly gross national income (GNI) per capita (for comparison: in 2024, the world price for 2GB of mobile broadband data was 0.7 per cent of monthly GNI per capita).⁶⁰

⁵⁵ "Law Governing Information and Communication Technologies," June 27, 2016, <https://rwandalii.org/akn/rw/act/law/2016/24/eng@2016-06-27>.

⁵⁶ "Digital & Connectivity Indicators - Rwanda | Forecast," Statista, accessed June 26, 2025, <http://frontend.xmo.prod.aws.statista.com/outlook/co/digital-connectivity-indicators/rwanda>.

⁵⁷ "ICT_Sector_Statistics_Report_as_of_first_quarter_of_2025.Pdf," accessed June 26, 2025, https://www.rura.rw/fileadmin/Documents/ICT/statistics/ICT_Sector_Statistics_Report_as_of_first_quarter_of_2025.pdf.

⁵⁸ "Rwanda: Freedom on the Net 2024 Country Report," Freedom House, accessed June 26, 2025, <https://freedomhouse.org/country/rwanda/freedom-net/2024>.

⁵⁹ "Rwanda: Freedom on the Net 2024 Country Report," Freedom House, accessed June 26, 2025, <https://freedomhouse.org/country/rwanda/freedom-net/2024>.

⁶⁰ <https://www.itu.int/en/ITU-D/Statistics/Pages/ICTprices/default.aspx>

40. Considering the fundamental role that the internet now plays in enabling human rights, the UN High Commissioner for Human Rights⁶¹ and academic research⁶² have suggested that internet access should itself be considered a human right. Recognising such a right implies a responsibility of governments to ensure that all citizens have meaningful internet access.

SURVEILLANCE LAWS AND PRIVACY RIGHTS

41. The right to privacy is guaranteed under Article 23 of the Constitution.⁶³ Rwanda maintains a pervasive surveillance capability, both through a robust legal framework that grants authorities broad monitoring powers and through the acquisition of sophisticated spyware tools.^{64 65} Balancing national security with the right to privacy and freedom of expression remains a critical challenge.
42. The fear of surveillance and reprisal has led to pervasive self-censorship online, with Rwandans largely refraining from criticising the state on social media.⁶⁶ Freedom House observed, “online mobilization [is] severely hampered” by pressure to avoid dissenting content.⁶⁷
43. Rwanda’s laws grant the government extensive authority to intercept communications. The primary statute is *Law No. 60/2013 of 22/08/2013* regulating the interception of communications. It provides that interceptions are lawful if done in the interest of national security and in accordance with the law. Crucially, it places the power to authorize interceptions in the hands of the executive: “an

⁶¹ OHCHR. 2023. It May be Time to Reinforce Universal Access to the Internet as a Human Right, Not Just a Privilege, High Commissioner tells Human Rights Council. <https://www.ohchr.org/en/news/2023/03/it-may-be-time-reinforce-universal-access-internet-human-right-not-just-privilege-high>

⁶² Reglitz. 2024. Free Internet Access as a Human Right (Cambridge: Cambridge University Press). <https://doi.org/10.1017/9781009520508>

⁶³ “CONSTITUTION OF THE REPUBLIC OF RWANDA – NEC,” accessed June 27, 2025, <https://nec.gov.rw/en/constitution-of-the-republicof-rwanda/>.

⁶⁴ Le Monde. “Opponents and Allies of Rwandan Regime Have Been Targeted with Pegasus Spyware for Years.” Published May 29, 2024. https://www.lemonde.fr/en/international/article/2024/05/29/opponents-and-allies-of-rwandan-regime-have-been-targeted-with-pegasus-spyware-for-years_6673041_4.html.

⁶⁵ “Amnesty International. (2021). Rwandan authorities chose thousands of activists, journalists and politicians to target with NSO spyware,” July 17, 2025. <https://www.amnesty.org/en/latest/press-release/2021/07/rwandan-authorities-chose-thousands-of-activists-journalists-and-politicians-to-target-with-nso-spyware/>

⁶⁶ “Rwanda: Freedom on the Net 2024 Country Report,” Freedom House, accessed June 26, 2025, <https://freedomhouse.org/country/rwanda/freedom-net/2024>. “Rwanda.”

⁶⁷ “Rwanda: Freedom on the Net 2024 Country Report,” Freedom House, accessed June 26, 2025, <https://freedomhouse.org/country/rwanda/freedom-net/2024>. “Rwanda.”

interception warrant shall be issued by a National Prosecutor designated by the Minister of Justice,” and in urgent cases, a verbal authorization can be given and retroactively formalized within 24 hours.

44. This means there is no independent judicial oversight at the authorization stage and warrants are essentially executive decisions. This concentration of power was flagged as problematic by rights groups, as it violates principles of impartial oversight. Moreover, the law’s definition of “national security” is vague. It is defined as “measures taken by the country to ensure its security”, creating potential for abuse.
45. Although the law requires post-facto written orders and limits an interception order’s duration to three months, the lack of external oversight raises doubts about how often, broadly, and for what purposes these powers are used.
46. In addition, the 2016 ICT Law⁶⁸ compels telecommunication service providers to facilitate government surveillance. Article 123 of that law requires telecom operators to install technical capabilities for lawful interception and monitoring on their networks. Article 126 empowers the Minister in charge of ICT to “interrupt... any private communication” deemed detrimental to national sovereignty, public order, or good morals, or to suspend any electronic communications service.
47. Article 127 further obliges service providers to hand over to the Minister or regulator any information requested for “guidance and supervision” of ICT activities. These provisions collectively give the government sweeping surveillance reach into both telephone and internet communications, with minimal checks.
48. Under Article 171⁶⁹ of the *Law No. 027/2019 of 19/09/2019* relating to Criminal Procedure, security organs are permitted to intercept private communications, such as phone calls, emails, and text messages, during investigations with prior written authorization from the Prosecutor General or their delegate. In urgent circumstances, the law allows interceptions to proceed without prior authorization, provided retroactive approval is obtained within 24 hours.

⁶⁸ “Law Governing Information and Communication Technologies,” June 27, 2016, <https://rwandalii.org/akn/rw/act/law/2016/24/eng@2016-06-27>.

⁶⁹ “Rwanda: Law No 027/2019 of 19/09/2019 Relating to the Criminal Procedure,” Refworld, accessed June 27, 2025, <https://www.refworld.org/legal/legislation/natlegbod/2019/en/123718>.

49. While this framework codifies certain procedural safeguards, it concentrates surveillance power within the executive branch, as the Prosecutor General is appointed by the President. In parallel, oversight of interceptions remains tied to the 2013 *Interception of Communications Law*, under which interception inspectors are also appointed by the President, raising structural concerns about the independence of surveillance oversight.
50. The UN Human Rights Council, in Resolution A/HRC/RES/7/36,⁷⁰ has emphasised that national security must not be invoked arbitrarily or unjustifiably to restrict the right to freedom of opinion and expression. This concern is particularly important in the digital context, where surveillance powers may be applied to online communications without adequate safeguards.
51. To address this, the definition of “national security” must be clarified and narrowly tailored across surveillance, penal, and media laws to prevent its misuse as a blanket justification for limiting rights. In line with the Johannesburg Principles, pioneered by ARTICLE19, national security should apply only to genuine threats—specifically, the use or threat of force against the state’s existence or territorial integrity.⁷¹
52. Beyond domestic laws, Rwanda has reportedly acquired and used advanced spyware against critics. In July 2021, revelations from the Pegasus Project implicated Rwanda in the use of NSO Group’s Pegasus spyware.⁷² Forensic investigations found that Rwandan authorities selected thousands of phone numbers, belonging to activists, journalists, political opponents, and even foreign officials, as potential targets of Pegasus hacking.⁷³ Leaked data indicated over 3,500 phone numbers with links to Rwanda were considered for targeting.⁷⁴ Its use by Rwandan intelligence, if confirmed, represents a serious violation of privacy and

⁷⁰ “UN Human Rights Council, Mandate of the Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression, A/HRC/RES/7/36,” July 16, 2025, https://ap.ohchr.org/documents/E/HRC/resolutions/A_HRC_RES_7_36.pdf.

⁷¹ “ARTICLE 19 (2013). Freedom of Expression and National Security: A Summary of the Johannesburg Principles.” July 17, 2025. <https://www.article19.org/resources/foe-and-national-security-a-summary/>

⁷² “The Pegasus Project,” *Amnesty International Security Lab* (blog), accessed June 27, 2025, <https://securitylab.amnesty.org/case-study-the-pegasus-project/>.

⁷³ “Rwanda: Freedom on the Net 2021 Country Report,” Freedom House, accessed June 27, 2025, <https://freedomhouse.org/country/rwanda/freedom-net/2021>.

⁷⁴ “Rwanda.”

freedom of expression.

- 53.** Within Rwanda, the government has invested in building an elaborate surveillance infrastructure. The capital, Kigali, and other cities are under extensive CCTV coverage, with a centralized command center run by the police. Authorities have also explored facial recognition technology in partnership with foreign companies to enhance monitoring.⁷⁵
- 54.** SIM card registration is also mandatory as all telecom operators in Rwanda are required to implement subscriber SIM card registration and cooperate with interception requests. There have been reports that Rwanda's intelligence service can directly access telecom networks.⁷⁶ During the COVID-19 pandemic, digital contact tracing tools were introduced, raising concerns that these could be repurposed for general surveillance of the population.
- 55.** Rwanda established the National Cybersecurity Authority (NCSA), which also serves as the Data Protection Office. The entity is tasked with granting certifications for data processing and can audit organizations for compliance.⁷⁷ However, it is a government body, housed under the Rwanda Information Society Authority (RISA) which is within the Ministry of ICT and Innovation. It is not an independent commission, which raises the issue of whether it would effectively check state surveillance practices. For example, if an individual's data was compromised by a state agency, it is unclear if the NCSA would have the will or authority to investigate that, given the political context.

ACCESS TO INFORMATION

- 56.** Rwanda's Access to Information (ATI) law, enacted in 2013, was one of the first in Africa and was praised as progressive at the time. The law gives everyone, including non-citizens, the right to request information from public bodies and some private bodies performing public functions.

⁷⁵ Rwanda National Police. "Inside Rwanda Police's High-Tech Shift to Safer, Smarter Policing." Rwanda National Police, October 18, 2022.
<https://police.gov.rw/media/news-detail/news/inside-rwanda-polices-high-tech-shift-to-safer-smarter-policing/#:~:text=Policing%20with%20a%20digital%20backbone,ahead%2C%E2%80%9D%20ACP%20Sakindi%20adds>.

⁷⁶ <https://freedomhouse.org/country/rwanda/freedom-net/2024>

⁷⁷ "Navigating Rwanda's New Data Protection Law."

- 57.** It has provisions for proactive disclosure and appeal mechanisms. In its third review, Rwanda received specific recommendations concerning access to information. The United Kingdom, for instance, recommended Rwanda to “ensure that State authorities comply with the access to information law”, which Rwanda accepted. This implies an acknowledgment that, while a good law exists, implementation has been lacking. Our assessment finds that implementation indeed remains weak, though there have been efforts to improve it.
- 58.** Although Rwanda's Access to Information Law in its Article 17 designates the Office of the Ombudsman as the oversight and appellate body for ATI-related complaints, the new law governing the Ombudsman's Office, no longer assigns it this specific mandate. As a result, there is currently no institution clearly tasked with monitoring or enforcing compliance with the Access to Information Law, leaving a significant accountability gap. Public institutions are still required to appoint information officers, yet in practice, journalists and citizens frequently encounter a culture of secrecy, delays, or silence, especially when requesting sensitive information related to human rights, security operations, or state expenditure. Officials often invoke overly broad exceptions or simply ignore requests altogether.
- 59.** The UPR implementation roadmap includes activities like training public officials on ATI, developing guidelines for handling requests, and raising awareness among the population about the right to information. Indeed, a notable initiative has been a project funded by the British High Commission in Kigali in partnership with Thomson Foundation to train Rwandan government officers on effectively implementing the ATI law. Starting in 2021, this program produced e-learning courses and workshops to “equip officials with the technical skills to interpret the law... and ensure that all information requests are dealt with properly.”⁷⁸
- 60.** However, it is too early to judge whether these trainings have led to a marked improvement. There is anecdotal evidence that response rates to information requests are still low. The Rwandan Governance Board and Ombudsman's office have not published comprehensive statistics on ATI requests granted or denied in recent years; such data, if it exists, is not made public. According to the 2024 Rwanda Media Barometer by RGB, the Access to information indicator scored

⁷⁸ “Access to Information Laws Training in Rwanda,” Thomson Foundation, accessed June 27, 2025, <https://www.thomsonfoundation.org/latest/creating-greater-transparency-and-accountability-of-government/>.

79.1%, reflecting strong formal legislation but showing room for improvement in practice, especially around proactive transparency and timely responses to requests.⁷⁹

61. In 2024, Rwanda ranked 68th out of 140 countries on the Global Right to Information Rating, scoring 86 out of 150. Over a decade since the adoption of the ATI law, there has been deliberate stagnation in legal reform and institutional support for information access, reflected in an unchanged score since 2021.⁸⁰
62. One illustrative case regarding ATI is the government's capacity around investigations or inquiries that may cast it in a negative light. For example, following the death of journalist John Ntwali in 2023, media and NGOs asked for details like police reports, accident scene evidence. Authorities provided no information beyond a statement.⁸¹ Requests by HRW and others for specifics were ignored, undermining the public's right to know the truth in a case of high public interest.
63. Rwanda has improved in publishing laws online through the Official Gazette. Yet, some regulations or directives, for instance, certain security-related directives or internal guidelines, are not readily available.
64. Furthermore, private media and civil society's capacity to utilize ATI is limited. Many journalists do not routinely file ATI requests, either due to lack of awareness, time, or skepticism that it will yield results. Those who do often resort to informal contacts to get information.
65. In May 2024, Rwanda denied entry to HRW senior researcher Clémentine de Montjoye, labeling the ban as an immigration issue. Despite having valid travel documents and notifying authorities in advance, she was turned away at Kigali airport and sent back to Nairobi. This marks the fourth instance since 2008 of a Human Rights Watch researcher being blocked from accessing the country.⁸² The

⁷⁹ "RGB Launches Rwanda Media Barometer 2024," accessed June 27, 2025, <https://www.rgb.rw/updates/news-detail/rgb-launches-rwanda-media-barometer-2024>.

⁸⁰ "Centre for Law and Democracy. (2024). Global Right to Information Rating: Rwanda. Access Info Europe & Centre for Law and Democracy." July 16, 2025. <https://www.rti-rating.org/country-data/Rwanda/>

⁸¹ "Questions Remain Over Rwandan Journalist's Suspicious Death | Human Rights Watch," July 18, 2023, <https://www.hrw.org/news/2023/07/18/questions-remain-over-rwandan-journalists-suspicious-death>.

⁸² "HRW Says Rwanda Denied Entry to Its Researcher," Democracy Now!, accessed June 28, 2025, https://www.democracynow.org/2024/5/17/headlines/hrw_says_rwanda_denied_entry_to_its_researcher.

denial occurred shortly after HRW published a critical report on Rwanda's regional role, coinciding with the UK's plan to send asylum seekers to Rwanda, highlighting the government's unwillingness to accommodate independent scrutiny even as it invites international cooperation.⁸³

⁸³ Diane Taylor, "Rwanda Denies Entry to Senior Human Rights Researcher," *The Guardian*, May 19, 2024, sec. World news, <https://www.theguardian.com/world/article/2024/may/19/rwanda-denies-entry-to-senior-human-rights-researcher>.

RECOMMENDATIONS

We urge that freedom of expression, access to information, and the right to privacy on and offline become prominent issues in the upcoming UPR review cycle. We therefore recommend that the government of Rwanda:

1. Repeal or amend all legislation that infringes upon the rights of citizens, journalists, activists, and human rights defenders to express themselves freely online and offline and bring them in line with Rwanda's International human rights obligations
 - a. Amend penal laws to eliminate vague and broad offenses such as "spreading false information," "harmful propaganda," or "publication of rumors that may damage credibility". Clearly define "national security" in surveillance, penal laws and media laws to align with international standards.
 - b. Decriminalise defamation and similar offences.
 - c. Amend Article 2(19) of the Media Law to explicitly recognise a broader spectrum of journalistic actors, including citizen journalists, bloggers, and freelancers. Accelerate the adoption of the revised Media Policy and reform the 2013 Media Law to align with international standards.
 - d. Review and amend the 2013 Interception of Communications Law and ICT laws to comply with constitutional and international privacy standards and require prior judicial authorization for communication surveillance, and ensure all surveillance is necessary, proportionate, and independently monitored. The law should protect the unrestricted use of encryption technology for personal and professional use e.g. for private messaging services and outlaw the use of spyware by government institutions and other agents that are not authorised and overseen by independent courts.
 - e. Ensure the independence of the Rwanda Media Commission, the National Cyber Security Authority. by enshrining its autonomy in law and requiring all state institutions to respect their mandate and decisions.
2. End harassment and reprisals against journalists and take concrete steps to ensure their safety by tackling impunity. Investigate all alleged physical attacks,

threats, and harassment promptly, independently, and effectively; assess any link to journalistic or human rights work; and prosecute those responsible.

3. Ensure full implementation of the Access to Information Law by assigning a clear and independent oversight body with powers to monitor compliance, receive complaints, adjudicate appeals, and impose sanctions. Strengthen proactive disclosure practices across public institutions and increase public awareness of the law through targeted outreach and training to enable citizens, journalists, and civil society to effectively exercise their right to information.
4. Uphold the right of peaceful dissent and media freedom by allowing media advocacy groups to register and operate without bureaucratic or political obstruction, including those working on sensitive topics.