



DIGITAL RIGHTS AND INCLUSION IN AFRICA REPORT

SUDAN
COUNTRY REPORT

2024

Sudan



Executive Summary

This report discusses the state of digital rights and digital inclusion in Sudan in the year 2024. The report's methodology relies on desk research focusing on specific thematic areas for incidents in Sudan, in line with TheScore Index, which is a scoring methodology developed by the Paradigm Initiative team, aiming to assess the state of digital rights in the focusing countries, as well as insights from the practical experience of working on digital rights in Sudan. The report explores diverse digital rights thematic areas, including internet access, freedom of expression, data protection and privacy, censorship and content moderation, access to information, AI and emerging technologies, and digital inclusion.

It provides recommendations to the Government, including the Sudanese Armed Forces (SAF), Rapid Support Forces (RSF), civil society, and the media. The year 2024 is considered one of the worst years for digital rights in Sudan. SAF and RSF violated the citizens' privacy and disrupted the Internet. The RSF's taking over telecommunication infrastructure represents a retrogression in the digital landscape in the country. The report ends with critical recommendations that are pertinent to improving the digital rights landscape in Sudan.

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Introduction

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Sudan lies in northeastern Africa, bounded on the north by Egypt, on the east by the Red Sea, Eritrea, and Ethiopia, on the south by South Sudan, on the west by the Central African Republic and Chad, and on the northwest by Libya.¹²⁶⁶ Since the ousting of the authoritarian regime of Al-Basheir in 2019, which ruled Sudan for 30 years, the Sudanese people gained hope to build a democratic country after the last revolution.¹²⁶⁷ However, the military took over as Sudan is now ruled by a military regime that has been in charge since October 25, 2021, when Lieutenant General Burhan led a military coup against his partners in the transitional government, just after the Sudan uprising. In 2024, the Sudanese people were living in a bad situation where a fierce war between the SAF and RSF was ongoing.¹²⁶⁸

As of January 2024, Sudan's total population was 48.73 million. However, 13.99 million citizens use the Internet, with internet penetration at a rate of 28.7%.¹²⁶⁹ There were 29.15 million cellular mobile connections in Sudan at the start of 2024.¹²⁷⁰ There are four main Internet Service Providers (ISPs) in Sudan, three of which are foreign-owned (Zain, MTN, and Canar), and the fourth is Sudatel, whose board of directors includes a member of the Transitional Sovereign Council, which represents the Head of State, and the Minister of Finance.¹²⁷¹

1266 Britannica, "Sudan", <https://www.britannica.com/place/Sudan>, (accessed on 15 November 2024).

1267 BBC, "Omar al-Bashir: Sudan's ousted president", <https://www.bbc.com/news/world-africa-16010445>, (accessed on 12 November 2024).

1268 Reuters, "Sudan war deaths are likely much higher than recorded, researchers say", <https://www.reuters.com/world/africa/sudan-war-deaths-are-likely-much-higher-than-recorded-researchers-say-2024-11-14/>, (accessed 15 November 2024).

1269 Data Portal, "DIGITAL 2024: SUDAN", <https://datareportal.com/reports/digital-2024-sudan>, (accessed on 15 November 2024).

1270 Data Portal, "DIGITAL 2024: SUDAN", <https://datareportal.com/reports/digital-2024-sudan>, (accessed on 15 November 2024).

1271 Sudatel, Board of directors, <https://www.sudatel.sd/investor-relations/governance/board-of-directors/>, (accessed on 15 November 2024).

Before February 2024, the internet space in Sudan was under the State's control, but the conflict in Sudan created a new era where other parties had an impact on internet infrastructure. However, this update worsened the state of internet freedom, weaponising internet shutdowns as a military tool. However, according to the Freedom On The Net 2024 report, Sudan's score for internet freedom is 28 out of 100, which is classified as "not free."¹²⁷² This ranking covers the second half of 2023 and the first half of 2024. The first half of 2024 witnessed numerous events that limited internet freedom and violated the citizens' digital rights, including network disruptions, censorship, and state-based disinformation.

Sudanese people had to live with internet shutdown occurrences, as the authorities were using these during political or civil unrest and again during national exams prior to 2024.¹²⁷³ The year 2024 represents another challenge in the history of internet shutdowns in Sudan because armed groups were involved in the decision to shutdown, apart from government decisions which, according to them, was based on laws and regulations, such as the announcement of the Ministry of Information to shut down the Internet during the national secondary school exams in December 2024.¹²⁷⁴ However, the government has withdrawn the decision. As the conflict escalated between the Sudanese Armed Forces (SAF), the official army of Sudan, and the paramilitary Rapid Support Forces (RSF), the RSF decided to use the Internet infrastructure as a weapon in its war against the SAF when RSF soldiers occupied the Internet Service Providers' (ISPs) data centers and main switchboards of telecommunications companies and shut them down completely, causing a nationwide communications shutdown in the country on February 4, 2024.¹²⁷⁵

Sudatel was the first ISP that partially restored service after only eight days from the shutdown.¹²⁷⁶ Zain followed in March,¹²⁷⁷ while MTN restored their services in May.¹²⁷⁸ These ISPs established a new telecom core in Port Sudan, the interim capital city of Sudan.

However, despite service restoration, this shutdown established a new era of internet access in Sudan, where numerous regions witnessed severe service instability, and others were in the dark for months, especially the Darfur region, Western Sudan, and major parts of Khartoum and Aljazira states. This event led people in disconnected areas to rely on Starlink as an alternative means of communication.¹²⁷⁹ Starlink became one of the main sources of internet in many areas in Sudan, directing the government to initiate talks with SpaceX, the owners of Starlink, to regulate its work in the country.¹²⁸⁰ However, RSF used to offer a paid Starlink connection for citizens in its control

1272 Freedom House, "Freedom On The Net 2024, Sudan", <https://freedomhouse.org/country/sudan/freedom-net/2024>, (accessed on 1 November 2024).

1273 CIPESA, "Sudan Conflict Affects Digital Communications and Critical Services Delivery", <https://cipesa.org/2023/06/sudan-conflict-affects-digital-communications-and-critical-services-delivery/>, (accessed on 1 November 2024)

1274 Twitter, Gov_moci, https://x.com/gov_moci/status/1872894493499719776?t=J3lh4KMyL5C6X2GdBORn7w&s=19, (accessed on 7 February 2025)

1275 Reuters, "Sudanese RSF brings down telecoms networks across Sudan - sources", <https://www.reuters.com/world/africa/sudanese-rsf-brings-down-telecoms-networks-across-sudan-sources-2024-02-05/>, (accessed on 1 November 2024)

1276 Ultra Sudan, "شاي الاول ايم ديغل يف قيطغتلل دوعت ينادوس فلبش [Sudani Network restores service in many states]", <https://ultrasudan.ultrasawt.com/%D8%B4%D8%A8%D9%83%D8%A9-%D8%B3%D9%88%D8%AF%D8%A7%D9%86%D9%8A-%D8%AA%D8%B9%D9%88%D8%AF-%D9%84%D9%84%D8%AA%D8%BA%D8%B7%D9%8A%D8%A9-%D9%81%D9%8A-%D8%A7%D9%84%D8%B9%D8%AF%D9%8A%D8%AF-%D9%85%D9%86-%D8%A7%D9%84%D9%88%D9%84%D8%A7%D9%8A%D8%A7%D8%AA/%D8%B9%D8%A7%D9%85%D8%B1-%D8%B5%D8%A7%D9%84%D8%AD/%D8%A3%D8%AE%D8%A8%D8%A7%D8%B1>, (accessed on 1 November 2024)

1277 Twitter, ZainSudan, <https://x.com/ZainSudan/status/1764217865530376300>, (accessed on 1 November 2024)

1278 Facebook, MTN Sudan, [https://www.facebook.com/mtnsudan1/posts/pfbid0JQN7GSjW5kAv32wmKbuAgQ8DRjKHraFmxRPo6Y-htYF1YtD2BYmw8TXus24TFGzzxl?__cft__\[0\]=AZXlyDgCvlfv-Yj7EH8rBVQfZ08zAQIM4WqRAQ2h_DMqOaVmVNjHKEu7id1ZZ_CLIQGW-eVtOgmQELhq-KaDGJufCihPJReEmIwZk2VO8bhqgN0ld-3nG_X8CsxqPL5bES2faQwQMgyxlp5XmER0Enpbmfpv9fg-ma8IQNmVN-AR-q8xR9UvjSV5jobhPiyllyUtr750-juvyjBtwxt8t62u&__tn__=%2CO%2CP-R](https://www.facebook.com/mtnsudan1/posts/pfbid0JQN7GSjW5kAv32wmKbuAgQ8DRjKHraFmxRPo6Y-htYF1YtD2BYmw8TXus24TFGzzxl?__cft__[0]=AZXlyDgCvlfv-Yj7EH8rBVQfZ08zAQIM4WqRAQ2h_DMqOaVmVNjHKEu7id1ZZ_CLIQGW-eVtOgmQELhq-KaDGJufCihPJReEmIwZk2VO8bhqgN0ld-3nG_X8CsxqPL5bES2faQwQMgyxlp5XmER0Enpbmfpv9fg-ma8IQNmVN-AR-q8xR9UvjSV5jobhPiyllyUtr750-juvyjBtwxt8t62u&__tn__=%2CO%2CP-R), (accessed on 1 November 2024)

1279 Global Voices, , <https://advox.globalvoices.org/2024/08/20/starlink-in-sudan-a-lifeline-or-war-facilitator/>, (accessed on 1 November 2024).

1280 WSJ, "The Black Market That Delivers Elon Musk's Starlink to U.S. Foes", <https://www.wsj.com/business/telecom/starlink-musk-ukraine-russia-sudan-satellite-communications-technology-f4fc79d9?st=mkk6ee0qeyq5y6q>, (accessed on 2 November 2024)

areas.¹²⁸¹

Moreover, the State, represented by the Telecommunication and Post Regulation Authority (TPRA), continued its control over telecommunications infrastructure by disrupting telecommunication shutdowns during specific military operations, such as the shutdown in the Omdurman area in September 2024.¹²⁸² This response also affected Starlink which occasionally cut off in SAF-controlled areas.¹²⁸³

The cost of internet access in Sudan can be considered expensive compared to the workers' situation. The internet price was 1861.67 Sudanese Pounds (SDG), equivalent to USD 0.72 per gigabyte (GB), including 40% VAT.¹²⁸⁴ However, some ISPs offer zero-rating access to Facebook.

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Freedom of Expression

In 2024, no cases of website blockage were recorded. However, numerous arrests related to freedom of expression were noted in 2024. On May 6, the SAF military intelligence department arrested four activists due to their activity on Facebook when they posted calls to stop the conflict.¹²⁸⁵ On October 29, police arrested the journalist, Abdelmaged Abdelhameid, after he wrote a post on Facebook about corruption allegations in the Central Bank of Sudan.¹²⁸⁶

The arrests expanded beyond the borders of Sudan when Egyptian authorities arrested Sudanese team members from Sudan Bukra TV.¹²⁸⁷ The Egyptian authorities have a security collaboration protocol with the Sudanese authorities. In addition, the Sudanese online activist, Hisham Ali, was arrested in Ethiopia by Ethiopian security personnel and two Sudanese security personnel related to the Sudan Embassy in Addis Ababa.¹²⁸⁸ Hisham is known for his investigative Facebook posts against military corruption.

Data Protection and Privacy

Sudan currently lacks a comprehensive data protection law.¹²⁸⁹ Despite this absence, Article

1281 Global Voices, "Starlink in Sudan: A lifeline or war facilitator?", <https://advox.globalvoices.org/2024/08/20/starlink-in-sudan-a-life-line-or-war-facilitator/>, (accessed on 14 November 2024)

1282 Aljazeera, "انبارد مآب تالاصتال عاطقن او رشافلاو موخرخل يف تالابتشال ددجت" [Renewed clashes in Khartoum and El Fasher, and communications cut off in Omdurman], <https://www.ajnet.me/news/2024/9/27/%D8%AA%D8%AC%D8%AF%D8%AF-%D8%A7%D9%84%D8%A7%D8%B4%D8%AA%D8%A8%D8%A7%D9%83%D8%A7%D8%AA-%D9%81%D9%8A-%D8%A7%D9%84%D8%AE%D8%B1%D8%B7-%D9%88%D9%85-%D9%88%D8%A7%D9%84%D9%81%D8%A7%D8%B4%D8%B1>, (accessed on 1 November 2024)

1283 Darfur 24, "رشافلاب يئاضفلا تنرتنالا لمع فقوي ين اوسلا شيجلا" [Sudanese army stops satellite internet in El Fasher], <https://www.darfur24.com/2024/10/17/%D8%A7%D9%84%D8%AC%D9%8A%D8%B4-%D8%A7%D9%84%D8%B3%D9%88%D8%AF%D8%A7%D9%86%D9%8A-%D9%8A%D9%88%D9%82%D9%81-%D8%B9%D9%85%D9%84-%D8%A7%D9%84%D8%A7%D9%86%D8%AA%D8%B1%D9%86%D8%AA-%D8%A7%D9%84%D9%81%D8%B6/>, (accessed on 1 November 2024)

1284 Zain Sudan, "Internet Packages", <https://www.sd.zain.com/Arabic/Pages/InternetOffers.aspx>, (accessed on 14 November 2024)

1285 Radio Dabanga, "فراضقلا فيالوب فتاوحلا يف نيسايس نيطشان عيبرا لقتعت تارابعتسال" [Intelligence arrests four political activists in Al-Hawata, Gedaref State], <https://www.dabangasudan.org/ar/all-news/article/%D8%A7%D9%84%D8%A7%D8%B3%D8%AA%D8%AE%D8%A8%D8%A7%D8%B1%D8%A7%D8%AA-%D8%AA%D8%B9%D8%AA%D9%82%D9%84-%D8%A3%D8%B1%D8%A8%D8%B9%D8%A9-%D9%86%D8%A7%D8%B4%D8%B7%D9%8A%D9%86-%D8%B3%D9%8A%D8%A7%D8%B3%D9%8A#:~:text=%D9%88%D9%82%D8%A7%D9%84%20%D9%86%D8%A7%D8%B4%D8%B7%20%D9%85%D9%86%20%D8%A7%D9%84%D8%AD%D9%88%D8%A7%D8%AA%D8%A9%20%D9%84%D8%B1%D8%A7%D8%AF%D9%8A%D9%88,%D8%A5%D9%84%D9%89%20%D9%85%D9%82%D8%B1%20%D8%A7%D9%84%D8%AC%D9%8A%D8%B4%20%D9%81%D9%8A%20%D8%A7%D9%84%D9%81%D8%A7%D9%88>, (accessed on 2 November 2024)

1286 Nabd Alsudan, "آيدودح فيالوب ين ادوس يف حص ىلع ضبقلا" [Arresting a Sudanese journalist in a bordering state], <https://nabdsudan.net/?p=146131>, (accessed on 2 November 2024)

1287 Facebook, Husam Osman Mahjoub, https://www.facebook.com/644873635/posts/10164679019563636/?mibextid=oFDknk&_did=BGRmAJSDajCZlg1#, (accessed on 2 November 2024)

1288 Alrakoba, "ابابا سيدا يف (ابلقندو ماشه) لاققتح" [(Hisham wd Daglba) arrested in Addis Ababa], <https://www.alrakoba.net/31970390/%D8%A7%D8%B9%D8%AA%D9%82%D8%A7%D9%84-%D9%87%D8%B4%D8%A7%D9%85-%D9%88%D8%AF%D9%82%D9%84%D8%A8%D8%A7-%D9%81%D9%8A-%D8%A3%D8%AF%D9%8A%D8%B3-%D8%A3%D8%A8%D8%A7%D8%A8%D8%A7/>, (accessed on 2 November 2024)

1289 Data protection Africa, "Sudan", <https://dataprotection.africa/sudan/>, (accessed on 3 November 2024)

20-1 of the 2013 Regulation for Organizing Payment Systems mentioned that payment service providers must take necessary measures to protect and preserve user data.¹²⁹⁰ Moreover, in the earlier-mentioned case when RSF took over telecommunications infrastructure and data centers, the telecommunications companies lost their users' data, which led to them later, after restoring service, \bypass the regulation of registering the users' data. In addition, as both ISPs and authorities do not have the users' Personal Identifiable Information (PII), this might impact the government's ability to trace the users' activities via their SIM cards, which has been reported many times.¹²⁹¹ On November 9, it was reported that the TPRA did not disrupt the service from the RSF soldiers' SIM cards "for security reasons," indicating SIM card activity tracing.¹²⁹² It is important to know that the TPRA Director is a military officer.

The Cybercrimes Law, 2018 criminalises fake news in Article 24. The vague provision states that a perpetrator intending to threaten public peace or undermine the prestige of the state, which opens the door to misuse of the law, will be liable. Article 24 of the same law stipulates that "Anyone who prepares or uses the information or communications network or any means of information, communications, or applications to publish any news, rumor, or report, knowing it to be false, with the intention of causing fear or panic among the public, or threatening public peace or tranquility, or detracting from the prestige of the state, shall be punished by imprisonment for a term not exceeding one year, or by flogging, or by both."¹²⁹³

The State-based practice of surveillance and privacy violations in Sudan is problematic, as the authorities used different technologies from several vendors during various eras.

Several privacy violation cases were reported during 2024. In January, Radio Dabanga reported that the security authorities in Port Sudan and other cities launched campaigns for electronic device inspection.¹²⁹⁴ On the other side, RSF continued inspecting the civilians' phones this year too. It has been reported that RSF hired women to inspect other women, including their phones.¹²⁹⁵ The RSF uses "suspicion" as a pretext to violate citizens' privacy by searching their conversations.

Osman Kibir, the former Vice President of Sudan, declared that his WhatsApp account was compromised in October 2024.¹²⁹⁶ Also, in March 2024, the account of the Sudanese politician Yasir Arman on the X platform was hacked.¹²⁹⁷ Arman accused the remnants of the 'Cyber Jihad' group of the National Congress Party (NCP), the party that ruled Sudan for 30 years and was ousted in 2019, of hacking his account.¹²⁹⁸ Media houses have not been spared from hacking attempts against their websites. The website of SudaNile, the famous news and commentary platform, has been compromised. The attacker deleted the last three months worth of website archives.¹²⁹⁹ Furthermore, the Facebook page of the Sudanese Popular Resistance, a pro-SAF initiative,

1290 Central Bank of Sudan, "Regulation for Organizing Payment Systems", https://web.archive.org/web/20230501153605/https://cbos.gov.sd/sites/default/files/ps_business_organization.pdf, (accessed on 1 November 2024)

1291 Freedom House, Freedom on The Net Sudan 2024, https://freedomhouse.org/country/sudan/freedom-net/2024#footnote4_1VYAL-JRVMI-v2bKZaU6-xzra4wao5XzY5O3plWNWQ_n4i6olu76vrE, (accessed on 3 November 2024)

1292 Nabd Alsudan, "نابذ السودان: كشف مصير بطاقات SIM المستخدمة من قبل قادة قوات الدعم السريع [Revealing the fate of the SIM cards used by the Rapid Support Forces leaders]", <https://nabdsudan.net/?p=148011>, (accessed on 3 November 2024)

1293 TPRA, "Informatics Crimes Law of the year 2018", <https://tpa.gov.sd/wp-content/uploads/2024/01/%D9%82%D8%A7%D9%86%D9%88%D9%86-%D9%85%D9%83%D8%A7%D9%81%D8%AD%D8%A9-%D8%AC%D8%B1%D8%A7%D8%A6%D9%85-%D8%A7%D9%84%D9%85%D8%B9%D9%84%D9%88%D9%85%D8%A7%D8%AA%D9%8A%D8%A9-%D9%84%D8%B3%D9%86%D8%A9-2018%D9%85.PDF.pdf>, (accessed on 12 November 2024)

1294 Akhbar Alsudan, "مخبر السودان: حملات تفتيش مكثفة في عتبات ومداخلات رجال الأمن في شوارع الخرطوم [Extensive inspection campaigns in Port Sudan include checking phones]", <https://www.sudanakhbar.com/1479507>, (accessed on 3 november 2024)

1295 Sudan Tribune, "فتيات تفتش المسافرين في شوارع الخرطوم: انتهاكات تثير غضب المسافرين [Inspection girls at Rapid Support Forces checkpoints...violations that anger female travelers]", <https://sudantribune.net/article281058/>, (accessed on 4 November 2024)

1296 Alzawia, "هackers seize WhatsApp of former Sudanese Vice President [Hackers seize WhatsApp of former Sudanese Vice President]", <https://alzaawia.net/87219>, (accessed on 4 November 2024)

1297 Nabd Alsudan, "سكافا: هacking ياسر ارمان [Hacking Yasser Arman's page on X]", <https://ar.nabdsudan.net/?p=115467>, (accessed on 4 November 2024)

1298 Nabd Alsudan, "سكافا: هacking ياسر ارمان [Hacking Yasser Arman's page on X]", <https://ar.nabdsudan.net/?p=115467>, (accessed on 4 November 2024)

1299 AllAfrica, "Sudan: Online Newspaper Sudanile Back Online After 'Serious Hack'", <https://allafrica.com/stories/202410240329.html>, (accessed on 4 November 2024)

announced that the page was hacked temporarily by an “unknown entity” until they restored it.¹³⁰⁰ The page did not mention how they restored the page. These events illustrate the clear weakness in digital security among political and public actors and activists. In addition, despite the harsh penalties in the Cybercrime Law, they have not deterred perpetrators from using the Internet for their crimes.

Censorship and content moderation

The year 2024 witnessed major changes in terms of content moderation efforts in Sudan. In October 2024, X followed Meta in suspending some RSF accounts, including the official account of the RSF, in addition to the account of the RSF commander, Mohamed Hamdan Daglo.¹³⁰¹ This step came after a public relations campaign led by a pro-SAF activist called Mohamed Kambal.¹³⁰²

However, the transparency centers of TikTok and Meta have not issued updates on the data of content removal requests this year. Also, Google’s transparency report does not include Sudan on the list of countries, representing a gap in the sources of information related to Sudan.¹³⁰³

In addition, this year, the government issued a decision banning “negative publishing.”¹³⁰⁴ Almonzir Elhag, a weather forecaster who runs a Facebook page that has more than a million followers, added a post mentioning that he received notification from SAF military intelligence banning him from publishing information about sandstorms for “security reasons.”¹³⁰⁵ However, Almonzir removed the notification post.¹³⁰⁶ A military expert interviewed by the researcher mentioned that this decision was issued due to its implications on public security because the RSF might use the weather circumstances to perform an attack.¹³⁰⁷

Access to information

Sudan has the Right to Access Information Act, 2015,¹³⁰⁸ which is concerningly restrictive of access to information instead of facilitating access. The law is not yet fully operational since it was passed, making the right to access information out of reach. In addition, even though it was enacted, the law classified some information that is banned from access by citizens, using “national security”

1300 Facebook, “فيديو: نداء من قبل المقاومة الشعبية السودانية”، [https://www.facebook.com/SudanPopularResistance/posts/pfbid0fKlhmH67YiXSnSTB5x-tyqoyLojzLsvNNdAQUiWyYqmZGCcLbie1FEDy5pADowsnsl?__cft__\[0\]=AZUJyFf63auvjeM8xVR4RZ_rPj7chwnPcs9vDafWRHnEw8PzfUOx-cakyZ-5ynDUSjpl1BKBZji4GPziY5jW-waLE11BUg8Ke4NRbXxFiO8cQyAbHWMuP6JhFggsxkxJ7Oweimxm3jY-V3z3mxRviib1ZzRntreLdP26sR-IOUnzp-IQ&__tn__=%2CO%2CP-R](https://www.facebook.com/SudanPopularResistance/posts/pfbid0fKlhmH67YiXSnSTB5x-tyqoyLojzLsvNNdAQUiWyYqmZGCcLbie1FEDy5pADowsnsl?__cft__[0]=AZUJyFf63auvjeM8xVR4RZ_rPj7chwnPcs9vDafWRHnEw8PzfUOx-cakyZ-5ynDUSjpl1BKBZji4GPziY5jW-waLE11BUg8Ke4NRbXxFiO8cQyAbHWMuP6JhFggsxkxJ7Oweimxm3jY-V3z3mxRviib1ZzRntreLdP26sR-IOUnzp-IQ&__tn__=%2CO%2CP-R), (accessed on 5 November 2024)

1301 Business & Human Rights Resource Centre, “Sudan: X has suspended the accounts of Hemedti and RSF”, <https://www.business-humanrights.org/en/latest-news/sudan-x-suspends-accounts-of-hemedti-and-rsf/>, (accessed on 6 November 2024)

1302 Aljazeera, “Controversy in Sudan after suspending Rapid Support Forces accounts”, <https://www.ajnet.me/news/2024/10/22/%D8%AC%D8%AF%D9%84-%D9%81%D9%8A-%D8%A7%D9%84%D8%B3%D9%88%D8%AF%D8%A7%D9%86-%D8%A8%D8%B9%D8%AF-%D8%A5%D9%8A%D9%82%D8%A7%D9%81-%D9%85%D9%86%D8%B5%D8%A7%D8%AA-%D8%AD%D8%B3%D8%A7%D8%A8%D8%A7%D8%AA>, (accessed on 6 November 2024)

1303 Google transparency report, “Government requests to remove content”, <https://transparencyreport.google.com/government-removals/government-requests?hl=en>, (accessed on 6 November 2024)

1304 Ultra Sudan, “[Khartoum State issues emergency order banning negative media publication]”, <https://ultrasudan.ultrasawt.com/%D9%88%D9%84%D8%A7%D9%8A%D8%A9-%D8%A7%D9%84%D8%AE%D8%B1%D8%B7%D9%88%D9%85-%D8%AA%D8%B5%D8%AF%D8%B1-%D8%A3%D9%85%D8%B1-%D8%B7%D9%88%D8%A7%D8%B1%D8%A6-%D9%8A%D8%AD%D8%B8%D8%B1-%D8%A7%D9%84%D9%86%D8%B4%D8%B1-%D8%A7%D9%84%D8%A5%D8%B9%D9%84%D8%A7%D9%85%D9%8A-%D8%A7%D9%84%D8%B3%D8%A7%D9%84%D8%A8/%D8%AA%D8%B3%D9%86%D9%8A%D9%85-%D8%AE%D9%88%D8%AC%D9%84%D9%8A/%D8%A3%D8%AE%D8%A8%D8%A7%D8%B1>, (accessed on 2 November 2024)

1305 Facebook, “رَبَخْ”، <https://www.facebook.com/photo.php?fbid=494038379813194&id=100076211091902&set=a.266474325902935>, (accessed on 2 November 2024)

1306 Facebook, “جاء الحاح دمحا رذنملا يوج دصار”، <https://www.facebook.com/monzir123/posts/pfbid0VXpK6GHHCxGxGXjLHyCtYwNwtaBWRv-jxHRNSVfZUFgRbyQfjwgvPjJgq5D3EbM9CI>, (accessed on 2 November 2024)

1307 Interview with X (31 December 2024)

1308 Ministry of Justice, “The Right to Access information act for the year 2015”, <https://moj.gov.sd/sudanlaws/#!/reader/chapter/362>, (accessed on 6 November 2024)

as a broad term that can potentially be abused and used to stifle access to information. Even though the law affirmed the rights of people with disabilities, it did not specify the accessible communication means that is required to ensure the inclusion of PWDs.¹³⁰⁹

Other laws that are used by authorities include the Telecommunication and Post Regulation Authority Law of 2018, the Law of the Sudanese Armed Forces of 2007 Amendment of 2019, and the Emergency and Public Safety Law of 1997.

The 2020 bylaw on Content Filtering and Website Blockage on the internet created a list containing 13 categories that must be filtered and blocked in Sudan.¹³¹⁰ These categories include child pornography, weapons, gambling, and betting. In addition to some vague categories, such as “calling for atheism” in article 16-E of the bylaw, opening a wide door for the bylaw abuse against religious freedom. Also, the same list stipulates in article 16-I that Virtual Private Networks (VPN) must be blocked, indicating an intention of blocking the circumvention tools.¹³¹¹

Digital Inclusion

Sudan does not have any artificial intelligence (AI) strategy or law related to it. By May 2024, the online passports portal, which arranges the passport appointment process inside and outside Sudan, had successfully completed 350,000 online requests for passports since its launch in September 2023.¹³¹² Moreover, the Embassy of Sudan in Egypt created a platform to facilitate citizens' needs, such as documenting certificates, marriage and divorce procedures, birth certificates, etc.¹³¹³ In February 2024, the Ministry of Education approved the project of the first online Sudanese school. The certified electronic school is affiliated with the Sudanese Working Abroad Regulatory Authority under the supervision of the Federal Ministry of Education.¹³¹⁴

This school represents hope for displaced Sudanese abroad to continue their education which stopped due to the conflict, especially in Egypt, where Egypt hosts 3.8 million Sudanese.¹³¹⁵ It is important to mention that the Egyptian authorities shut down Sudanese schools in its land,

1309 Global Voices, “The case for reforming the Sudanese Access to Information Act”, <https://globalvoices.org/2019/08/28/the-case-for-reforming-the-sudanese-access-to-information-act/>, (accessed on 7 November 2024)

1310 TPRA, “List of filtering and blocking pages and websites on the Internet for the year 2020”, <https://tpa.gov.sd/wp-content/uploads/2023/12/%D9%84%D8%A7%D8%A6%D8%AD%D8%A9-%D8%AA%D8%B1%D8%B4%D9%8A%D8%AD-%D9%88%D8%AD%D8%AC%D8%A8-%D8%A7%D9%84%D9%85%D9%88%D8%A7%D9%82%D8%B9-%D9%88%D8%A7%D9%84%D8%B5%D9%81%D8%AD%D8%A7%D8%AA-%D8%A7%D9%84%D8%A5%D9%84%D9%83%D8%AA%D8%B1%D9%88%D9%86%D9%8A%D8%A9-%D8%B9%D9%84%D9%89-%D8%B4%D8%A8%D9%83%D8%A9-%D8%A7%D9%84%D8%A5%D9%86%D8%AA%D8%B1%D9%86%D8%AA-%D9%84%D8%B3%D9%86%D8%A9-2020%D9%85.pdf>, (accessed on 9 January 2024)

1311 Global Voices, “How the government in Sudan legalized internet categorizing and content filtering”, <https://advoc.globalvoices.org/2022/08/02/how-the-government-in-sudan-legalized-internet-categorizing-and-content-filtering/>, (accessed on 8 November 2024)

1312 Facebook, Abobaker Altaif, https://www.facebook.com/story.php?story_fbid=10223810626645366&id=1585667229&mibextid=oFD-knk&rdid=gL8988gCdT00bcOd#, (accessed on 8 November 2024)

1313 Sudan Embassy in Egypt, “Digital Gate”, <https://portal.sudanembassyeg.gov.sd/home>, (accessed on 8 November 2024)

1314 Nabd Al Sudan, “نادوسال يف تقيورتكلال صردم لؤا قييصت” [Certification of the first electronic school in Sudan], <https://nabdsudan.net/?p=112534>, (accessed on 9 November 2024)

1315 IOM, “150 Sudanese Sudan Migrants Return Home with the Assistance of IOM Egypt”, <https://egypt.iom.int/news/150-sudanese-sudan-migrants-return-home-assistance-iom-egypt#:~:text=Egypt%20is%20a%20country%20of,8m%20nationals%20living%20in%20Egypt.>, (accessed on 8 January 2025)

indicating a positive impact of the online school.¹³¹⁶ However, the school does not offer offline features for those who are out of coverage, representing the digital divide in the community.

In August 2024, the National Information Center (NIC), which is a government agency that is described as “the government’s consultant in ICT”, established a committee for digital transformation in the health sector.¹³¹⁷ In addition, NIC announced connecting six governmental institutions to its network.¹³¹⁸ Despite this effort, it reflects the real digital gap in the government’s operation after the conflict.

The 2023 Londa report,¹³¹⁹ mentioned that the websites of the TPRA and NIC were not running since RSF shut down the government data center in Khartoum. However, both TPRA and NIC restored their websites, and they are currently running.

The government established the Universal Service Fund (USF) Project in Sudan three times, starting in 2003 after forming the Information Technology Development Council. Then, in 2005, the council was changed to be a ‘Fund’ instead of a ‘Council’, and finally, the current Universal Service Fund was established under the new name in the year 2018, according to the Telecommunication and Post Regulation Act (TPRA).¹³²⁰

The regulator, TPRA, conducts annual surveys for the comprehensive service project. The last publicly available information was in 2018, when a survey was conducted targeting 55 areas that were not covered by communication networks in the first phase to collect correct data and then classify them in terms of economic feasibility for profit and loss feasibility for operators and ISPs. The survey team found that there are 17 feasible areas and 38 non-feasible areas. Starting in 2018, the TPRA specified that the USF mission is to be responsible for supporting the economically unfeasible areas, while the telecommunications companies should include the economically feasible areas in their annual plan for implementation.¹³²¹

However, our research did not reveal any information about any projects that the USF supported in 2024. In 2023, the TPRA Director, Dr. Alsadig Gamal, mentioned that they do not have any plans or resources allocated to the USF due to the ongoing conflict in the country.¹³²²

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- 1316 Asharq Alawsat, “إقبال غرام روموش 3 دعب عجارفنا راضطناب رصم يف عيادوسال سرامدل”, <https://aawsat.com/%D8%A7%D9%84%D8%B9%D8%A7%D9%84%D9%85-%D8%A7%D9%84%D8%B9%D8%B1%D8%A8%D9%8A/%D8%B4%D9%85%D8%A7%D9%84-%D8%A7%D9%81%D8%B1%D9%8A%D9%82%D9%8A%D8%A7/5085220-%D8%A7%D9%84%D9%85%D8%AF%D8%A7%D8%B1%D8%B3-%D8%A7%D9%84%D8%B3%D9%88%D8%AF%D8%A7%D9%86%D9%8A%D8%A9-%D9%81%D9%8A-%D9%85%D8%B5%D8%B1-%D8%A8%D8%A7%D9%86%D8%AA%D8%B8%D8%A7%D8%B1-%D8%A7%D9%86%D9%81%D8%B1%D8%A7%D8%AC%D8%A9-%D8%A8%D8%B9%D8%AF-3-%D8%B4%D9%87%D9%88%D8%B1-%D9%85%D9%86-%D8%A5%D8%BA%D9%84%D8%A7%D9%82%D9%87%D8%A7>, (accessed on 8 January 2025)
- 1317 NIC, “يحصل ماظنل يمحورل لوجنل عورشم يل ع فارشال قمنادل قنجلال امع قاطن”, [Launch of the Permanent Committee for Supervising the Digital Transformation Project of the Health System], <https://www.nic.gov.sd/public/news>, (accessed on 9 November 2024)
- 1318 NIC, “يموكح تاسسوم تسيل يكبشال طبرل لامتكاف”, [Networking of six government institutions completed], <https://www.nic.gov.sd/news/details/9>, (accessed on 9 November 2024)
- 1319 PARADIGM INITIATIVE, “Londa 23 Sudan”, https://paradigmhq.org/sdm_downloads/londa-23-sudan-en/, (accessed 9 January 2025)
- 1320 TPRA, “Universal Service Fund”, <https://web.archive.org/web/20190422055334/https://tpa.gov.sd/wp-content/uploads/2018/06/Universal-Service-Fund.pdf>, (accessed on 10 November 2024).
- 1321 TPRA, “Universal Service Fund”, <https://web.archive.org/web/20220625164326/https://tpa.gov.sd/regulation-issues/%d8%a7%d9%84%d9%85%d8%b4%d8%a7%d8%b1%d9%8a%d8%b9/universal-service/>, (accessed on 10 November 2023).
- 1322 Paradigm Initiative, “Londa Sudan 2023”, https://paradigmhq.org/sdm_downloads/londa-23-sudan-en/, (accessed on 10 November 2024)

The Score Index

Londa 2025 Key Indicators	ACHPR Declaration (<i>P stands for Principle</i>)	Score	Justification
Internet Shutdowns	P38(2)	2	The government shut down the internet in specific areas during some military operations.
Inexistent laws, policies and other measures to promote universal, equitable, affordable and meaningful access to the internet	P37	2	There is a Universal Service Fund but the government did not support it this year.
False News Criminalisation	P22(2)	2	The Cybercrimes law criminalised false news.
Sedition Legislation	P22(2)	2	The Cybercrimes law criminalised Sedition.
Arbitrary Arrests and Harassments of the Media, HRDs and Citizens	P20(1) & (2)	1	Several arrests and media harassment cases by the authorities have been reported.
Data Protection Legislation.	P42	2	While some laws have articles related to data protection, there is no data protection legislation
States interfere and require the removal of online content by internet intermediaries	P38 and P39(4)	2	While there is no information for this year, last year witnessed numerous cases of governmental interference.
Invasion of Privacy of Communications	P41	1	The government, represented in SAF, performed electronic devices inspection campaigns. Also, there are indicators of surveillance using telecommunication infrastructure.
Failure by the government to proactively disclose and disseminate information digital technologies.	P29(3)	2	While the government used to announce information using the official news agency and the Spokesperson platform, there is missing information that it couldn't be found without media reports. Sudan passed the 'Right to Access Act' in 2015. The law contains a list of 12 types of classified information that are restricted from citizens, using vague terms in describing these categories which are used as a justification for non-disclosure.

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AI and Emerging Technologies national strategies	P39(6)	1	No strategy related to AI and emerging technologies
Adoption of specific child laws, policies and measures promoting children's digital safety and privacy online	P37(5)	2	Article 35 of the Cybercrimes Law punished the criminals who threaten or deceit a child. However, there is no on-ground pro-active application.
Digital Inclusion	P37(3)	2	There is no public information about the USF. However, there are some reports on governmental efforts for digital inclusion and e-government.
TOTAL (up to 60)		21	Mildly Compliant

Conclusion

Internet freedom in Sudan has declined significantly in 2024 due to the ongoing conflict. The RSF taking over ISPs' infrastructure and imposing a nationwide internet shutdown was a turning point in the country's digital landscape. While the ISPs restored service, large parts of the country, especially conflict zones such as Darfur, are still out of coverage. The appearance of alternative means of access such as Starlink shows the need for reliable communication channels in Sudan, but the government's attempt to regulate these services shows the conflict between internet freedom and state control. Moreover, the high cost of internet access makes life harder for the Sudanese people.

Furthermore, internet-related laws are still in need of reform, and this year saw a continuation in censorship, arrests, and surveillance. Journalists and activists were repressed for expressing political views or challenging state narratives. The absence of data protection laws reflects the vulnerability of the digital nature in Sudan. The government's effort around digital transformation in sectors like health and education offers some hope, but it is restricted by instability and a lack of resources. However, the ongoing conflict complicates the future of the digital landscape in Sudan.

Recommendations

To the government:

- The government should stop issuing network disruption orders, even during military operations.
- The Sudanese government should amend the laws of Combating Cybercrimes, Press and Press Publications of 2009, Telecommunication and Post Regulation Authority, 2018 and National Security of 2010, which contain vague terms and impose harsh and disproportionate punishments on the state workers to discard vague provisions and criminalisation of false news and sedition.
- The government should enact a data protection law.
- The government should establish a committee to prepare a national strategy for AI and emerging technologies.
- The government should implement the Access to Information Act to increase access to information, which will reduce the spread and impact of disinformation and empower citizens to access the right information from their sources.
- The government should reduce the telecommunications tax to ensure affordable internet access.
- The government should support the operationalisation of the Universal Service Fund and proactively disclose the use of the funds.
- The government should not target citizens, journalists, and activists based on their online activities.
- The government should stop arbitrarily seizing and inspecting citizens' phones and other electronic devices, violating encryption, and breaching the right to privacy.
- The government should activate the Sudan Computer Emergency Response Team (CERT) and offer communication channels with the citizens to reduce the impact of the cyber attacks.

To the Rapid Support Forces (RSF):

- RSF should stop targeting telecommunications infrastructure in conflict times.
- RSF should not target citizens, journalists, and activists based on their online activities.
- RSF should not use the citizens' need for the Internet to finance armed conflict by stopping offering satellite connectivity in the out-of-coverage areas for an expensive

cost.

- RSF should stop illegally seizing and inspecting or stealing citizens' phones and other electronic devices.

To the Civil Society:

- Civil society in Sudan should establish advocacy campaigns toward legal reforms, focusing on enacting data protection laws.
- Civil society should fight against internet shutdowns in conflict zones.
- Civil society must raise the digital rights awareness of the Sudanese people through training and media campaigns.
- Civil society should provide digital safety training to the targeted people with spyware or other forms of digital surveillance.

To the Media:

- The media houses should enhance their capacity in fact-checking and anti-disinformation skills.
- The Syndicate of Journalists should provide digital safety training to its members.

To the private sector:

- Meta, X, and TikTok should update their transparency reports periodically, and Google should add Sudan to their report.

