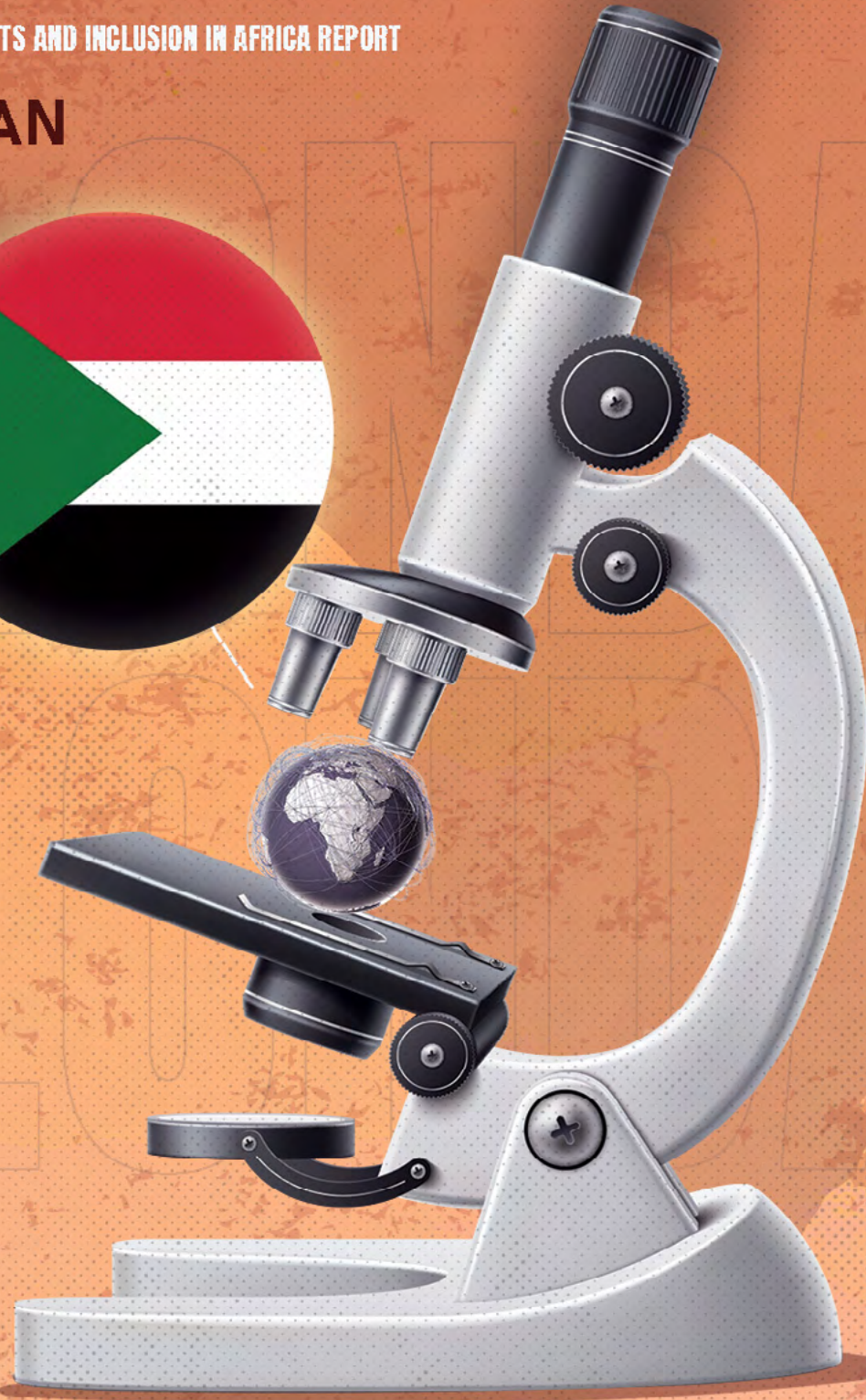
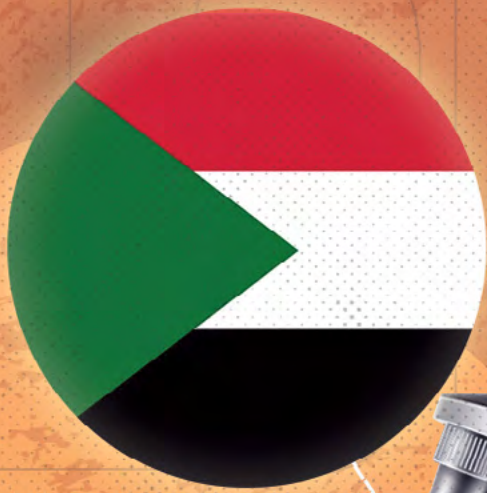


LONDA

DIGITAL RIGHTS AND INCLUSION IN AFRICA REPORT

SUDAN



2022

LONDA

Digital Rights and Inclusion in Africa Report 2022

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Sudan



▶ Executive Summary

This report discusses the digital rights issues and digital inclusion progress in Sudan. The report provides recommendations to the government, civil society and the media. 2022 is considered one of the worst years for digital rights in Sudan. The authorities practised several digital authoritarianism features such as network disruption, censorship, information manipulation and legal abuse. The report shows that there are institutional disinformation campaigns. Despite that, the government established a centre to combat the rumours.

The Sudanese government shut down the internet several times, during many events, justifying this practice with many excuses. It also imported Israeli spyware and produced several disinformation campaigns using state resources. Moreover, the Sudanese government abused the laws with vague terms, which normalise digital repression and make it lawful. Despite these violations, the authorities have made some efforts to provide telecommunication access to the people through the Universal Service Fund. To facilitate telecommunication access to the people, the Universal Service Fund signed agreements with some telecommunications companies to expand the coverage, but it faces some obstacles which impeded the development efforts.



Introduction

Sudan lies at the crossroads of Sub-Saharan Africa and the Middle East, located in northeastern Africa. It is 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.¹ Since the ousting of Sudan's authoritarian leader Omar al-Bashir in 2019 who ruled for three decades, the Sudanese people gained hope to build a democratic country after the last revolution.² However, the military did not let this hope move forward as Sudan is now ruled by a military regime that has ruled since October 25, 2021, when Lt Gen Burhan led a military coup against his partners in the transitional government which came after the Sudan uprising.

As of January 2022, Sudan's total population was 45.45 million. Some 14.03 million of the citizens use the internet, which leads the internet penetration to stand at 30.9 per cent.³ According to data from GSMA Intelligence, there were 35.76 million cellular mobile connections in Sudan at the start of 2022.⁴ 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 – the Head of State – and the Minister of Finance.⁵ To demonstrate some of the key developments, this report predominantly relies on desktop research as well as insights from the practical experience of working on digital rights in Sudan. This report focuses on key developments related to Internet freedom, data governance, developments in ICT and emerging technologies, and a review of the Universal Service Fund.

1 Britannica, "Sudan", <https://www.britannica.com/place/Sudan>, (accessed on December 8, 2022)

2 BBC, "Omar al-Bashir: Sudan's ousted president", <https://www.bbc.com/news/world-africa-16010445>, (accessed on December 8, 2022)

3 Data Portal, "DIGITAL 2022: SUDAN", <https://datareportal.com/reports/digital-2022-sudan>, (accessed on December 12, 2022)

4 Data Portal, "DIGITAL 2022: SUDAN", <https://datareportal.com/reports/digital-2022-sudan>, (accessed on December 12, 2022)

5 EMIS, Sudatel Telecom Group, https://www.emis.com/php/company-profile/SD/Sudatel_Telecommunications_Group_Ltd_Sudatel_Telecommunications_Group_Ltd_en_2134991.html, (accessed on December 12, 2022)

Country Analysis

INTERNET FREEDOM

The internet space in Sudan is under the State's control as the internet freedom index continues to fall. According to the *Freedom On The Net 2022 report*, Sudan's score for internet freedom is 29 out of 100, which is classified as "Not Free".⁶ This ranking covers the second half of 2021 and the first half of 2022. The first half of 2022 witnessed numerous events that limited Internet Freedom and violated the citizens' digital rights, including network disruptions, content filtering, and state-based disinformation.

NETWORK DISRUPTIONS

In 2022, the authorities shut down the internet four times on different events. On June 11, 2022, the public prosecutor ordered a shutdown of the internet for three hours on a daily basis, and it continued for 12 days.⁷ The reason given was that it was necessary to prevent cheating during the national secondary school exams. Following this, on June 30, 2022, the internet was disrupted during the million-man march in Sudan for 25 hours.⁸ In October 2022, two disruptions occurred, the first incident was on October 18, in synchronisation with tribal conflict in the Blue Nile region,⁹ and the second was on October 25, during the anti-coup march, and it lasted for eight hours.

FREEDOM OF EXPRESSION AND MEDIA FREEDOMS

The Sudanese authorities still blocked news websites and online platforms, as at September 2022, to restrict sharing of opposition information, prevent the protestors from coordinating, and limit sharing of the documentation of human rights violations abroad.

On September 27, the public prosecutor ordered the blocking of the website of the *Al-Sudani* newspaper.¹⁰ The Sudanese Electronic Press Association condemned the order, saying: "We reject prior trials and convictions from any party except the Judiciary". Ultimately, the website was not blocked after the leakage of the prosecutor's order.¹¹ In January, the Sudanese authorities withdrew the licence of *Al Jazeera Mubasher* TV channel and its staff in Sudan, justifying the decision due to "the un-professional coverage of the Sudanese affairs and the reporting of incorrect information that damages the country's interest and social fabric".¹²

In February 2022, security forces arrested Mohanad Hamid, a member of the Central Committee of Sudanese Doctors, because he was calling and mobilising against the coup, online and offline.¹³ Also, the authorities issued an arrest warrant against Abdalrahman Al-

6 Freedom House, "Freedom On The Net 2022, Sudan", <https://freedomhouse.org/country/sudan/freedom-net/2022>, (accessed on December 17, 2022)

7 SMEX, "Cost of Internet Shutdowns", <https://smex.org/the-cost-of-internet-shutdowns/>, (accessed on December 18, 2022)

8 Carter Center, "Carter Center Statement on Internet Shutdown in Sudan", <https://www.cartercenter.org/news/pr/2022/sudan-063022.html>, (accessed on December 18, 2022).

9 Altaghyeer, "[Cut off internet service from areas of tribal tensions in the Blue Nile region]", <https://www.altaghyeer.info/ar/2022/10/18/%D9%82%D8%B7%D8%B9-%D8%AE%D8%AF%D9%85%D8%A9-%D8%A7%D9%84%D8%A7%D9%86%D8%A%D8%B1%D9%86%D8%AA-%D9%85%D9%86-%D9%85%D9%86%D8%A7%D8%B7%D9%82-%D8%A7%D9%84%D8%AA%D9%88%D8%AA%D8%B1%D8%A7%D8%AA-%D8%A7%D9%84/>, (accessed on December 18, 2022).

10 Reuters, "Sudanese authorities launch cases against newspaper, bar association", <https://www.reuters.com/world/africa/sudanese-authorities-launch-cases-against-newspaper-bar-association-2022-09-28/>, (accessed on September 16, 2022).

11 Alsudani, "[For the second time without conducting an investigation with the newspaper]", <https://www.alsudaninews.com/ar/?p=159541>, (accessed on December 27, 2022).

12 Al Jazeera, "Sudan withdraws licence of Al Jazeera Mubasher", <https://www.aljazeera.com/news/2022/1/16/sudan-withdraws-al-jazeera-mubasher-license>, (December 27, 2022).

13 Freedom House, "Freedom on The Net 2022 Sudan", <https://freedomhouse.org/country/sudan/freedom-net/2022>, (accessed on December 17, 2022).

Ajib, a journalist who published an article about corruption at the Ministry of Minerals. The Syndicate of Journalists condemned this practice describing the police as: “they did not respect his most fundamental rights”.¹⁴

PRIVACY AND SURVEILLANCE



The State-based practice of surveillance and privacy violation in Sudan has a bad record as the authorities used different technologies from several vendors during various eras. In May 2022, Light House Reports, a non-profit based

in the Netherlands, published a report claiming that Rapid Support Forces (RSF) – a paramilitary force in Sudan – imported “Predator”, a spyware developed by Intellexa, a cyber firm based in Cyprus, registered in the European Union, and owned by Tal Dilian, a former Israeli intelligence operative.¹⁵ “Predator” is a phone hacking software which once on your phone, can gain complete control over the mobile devices it infects. This includes accessing personal messages and files, recording calls, and monitoring the environment through the camera and microphone.¹⁶ The report on the *State of Internet Freedom in Africa 2022* mentioned that Sudan’s capital, Khartoum, has 4,000 governmental CCTV cameras spread across the city.¹⁷

DISINFORMATION

The Sudanese authority is using the method of spreading disinformation and fake news through social media and online news websites to “crush internet-based dissent” through the Cyber-Jihad Unit.¹⁸ In February 2022, *Beam Reports*, a Sudanese fact-checking platform published a report showing that Rapid Support Forces (RSF) used an “inauthentic” research centre based in Paris to spread its propaganda and wash its reputation and bad history in human rights.¹⁹ Also, they published a report defining how the authorities prefaced the October 2021 coup with a disinformation campaign.²⁰ In December 2022, the government of Khartoum State declared the establishment of the Centre of Combating Rumours.²¹ Citizens

14 Cipesa, “Three Years After Al-Bashir Ouster, Sudan’s Internet Freedom Landscape Remains Precarious”, <https://cipesa.org/2022/12/three-years-after-al-bashir-ouster-sudans-internet-freedom-landscape-remains-precious/>, (accessed on December 22, 2022).

15 Light House Reports, “FLIGHT OF THE PREDATOR”, <https://www.lighthousereports.nl/investigation/flight-of-the-predator/>, (accessed on November 30, 2022).

16 Atlas VPN, “What is Predator spyware? Threat to mobile devices”, <https://atlasvpn.com/blog/what-is-predator-spyware-threat-to-mobile-devices>, (accessed on December 6, 2022)

17 CIPESA, “State of Internet Freedom in Africa 2022: The Rise of Biometric Surveillance”, <https://cipesa.org/2022/09/state-of-internet-freedom-in-africa-2022-the-rise-of-biometric-surveillance/>, (accessed on December 29, 2022)

18 BBC, “Sudan to unleash cyber jihadists”, <https://www.bbc.com/news/technology-12829808>, (accessed on November 23, 2022)

19 Beam Reports, “How RSF seeks to improve its reputation through a foreign interface”, <https://www.beamreports.com/2022/02/14/%D9%83%D9%8A%D9%81-%D9%8A%D8%B3%D8%B9%D9%89-%D8%A7%D9%84%D8%AF%D8%B9%D9%85-%D8%A7%D9%84%D8%B3%D8%B1%D9%8A%D8%B9-%D9%84%D8%AA%D8%AD%D8%B3%D9%8A%D9%86-%D8%B5%D9%88%D8%B1%D8%AA%D9%87-%D8%B9%D8%A8%D8%B1/>, (accessed on December 14, 2022).

20 Beam Reports, “How an organized disinformation campaign paved the way for the October 25 coup”, <https://www.beamreports.com/2022/10/23/%d9%83%d9%8a%d9%81-%d9%85%d9%87%d8%af%d8%aa-%d8%ad%d9%85%d9%84%d8%a9-%d9%85%d9%86%d8%b8%d9%85%d8%a9-%d9%85%d9%86-%d8%a7%d9%84%d9%85%d8%b9%d9%84%d9%88%d9%85%d8%a7%d8%aa-%d8%a7%d9%84%d9%85%d8%b6%d9%84/>, (accessed on December 23, 2022).

21 Spokesperson platform, “Inauguration of the Anti-Rumour Centre in Khartoum next Wednesday”, <https://>

flagged many questions about the mission of this centre because of how the government practises institutional disinformation and at the same time establishes a centre to combat it.

DATA GOVERNANCE

Internet-related legal framework in Sudan has many laws that fully and partially govern data and the internet. Sudan has ratified key international human rights instruments including the International Covenant on Civil and Political Rights (ICCPR), the International Covenant on Economic, Social and Cultural Rights (ICESCR), and the African Charter on Human and Peoples' Rights (ACHPR), which guarantee the right to freedom of assembly, freedom of expression, and the right to receive, impart and disseminate information.

However, the Interim Constitutional Charter of 2019 guarantees the right to access the internet with some limitations as it stipulates: "Every citizen has the right to access the internet, without prejudice to public order, safety, and morals in accordance with what is determined by law."²² Most of Sudan's internet-related laws have terms that are vague, non-defined, and may be misused by the government. The Telecommunication and Postal Regulation Authority Act (TPRA) has mentioned that "anyone may not access telecommunication or eavesdrop on or monitor it without permission from the prosecutor or the competent judge."²³

Furthermore, the Cybercrimes law gives the so-called "competent authority" the right to violate the citizens' privacy. The law imposed a punishment of imprisonment, a fine or both for anyone who violates the privacy of the citizens. However, the same article considered the same actions not a crime if they came under the permission of the public prosecutor,

judicial or competent authority. The term "competent authority" is a broad term, making the law subject to misuse.²⁴

The National security law has some repressed articles. One of them is article 25 because it leaves unlimited power for the staff of the General Intelligence Service (GIS) to violate citizens' privacy. It stipulates: "The security service has the right to request information, data, documents or things from anyone to check it or take it". The law gives the Sudanese GIS full authority to do this without any court order, which exposes citizens to violations under the pretext of security.²⁵

The Sudanese National Council, or Parliament, passed the "Right to Access Information Act" in 2015. This is the first law related to information accessibility in Sudan. Even though the law has been legislated, it remains idle. For example, the law mandates the establishment of "The Commission for the Right to Access Information" as the regulator for accessing information at any public institution but nothing has been done to set up this commission, which means citizens still cannot exercise their right to information.²⁶

The law has many defects that limit the freedom of access to information because it lists 12 types of categorised information that are restricted from citizens, including information related to "national security" and "foreign policy". As mentioned in the above laws, these terms are ambiguous, which allows the authorities to limit the people's ability to fully access information, which restricts the path to transparency and accountability. Article 10(g) further undermines citizens' ability to access information by empowering any public institution to enforce fees on citizens requesting information. The act does not oblige

spokesperson.gov.sd/?p=3668, (accessed on December 24, 2022).

22 Constitute Project, "Sudan's Constitution of 2019", art. 57 (2) https://www.constituteproject.org/constitution/Sudan_2019.pdf?lang=en, (Accessed on December 30, 2022).

23 TPRA law, art 74, <http://tpra.gov.sd/wp-content/uploads/2018/06/Telecommunications-and-Postal-Regulation-Act.pdf>.

24 Combating Cybercrimes law, art 23, <https://moj.gov.sd/files/download/204>.

25 National Security Law, art 25, <https://menarights.org/sites/default/files/2016-11/Sudan%20National%20Security%20Act%202010%20%28AR%29.pdf>.

26 Advox, "Unfreedom Monitor Report: Sudan", <https://advox.globalvoices.org/2022/08/04/unfreedom-monitor-report-sudan/>, (accessed on December 30, 2022).

the information holders any duty to proactively disclose information in their possession.²⁷

The Regulation on Filtering and Blocking Websites and Web Pages on the Internet, for the year 2020, gave the TPRA the right to block websites without judicial order while requiring the affected citizens to go to court to unblock the websites. Broad terms such as “belief” have been mentioned in the regulation to justify website blocking. The regulation didn’t define what “belief” is.²⁸

In addition to internet-related laws, the authorities use other laws and regulations to repress digital rights in Sudan. In October 2022, the Human Aid Commission (HAC), the regulator of non-governmental organisations in Sudan, notified the director of the Sudanese Consumers Protection Society (SCPS) of its decision to cancel SCPS’s registration, seize its assets and properties and suspend its bank accounts inside and outside Sudan. The SCPS has a history of advocating against network disruptions by using the legal path against Internet Service Providers (ISPs).²⁹

However, despite these bad aspects of the legal framework in Sudan, there are some encouraging provisions such as those mentioned in the Regulation of Filtering and Blocking Websites and Web Pages on the Internet, and the Regulation for Licensing and Regulating the Work of Financial Institutions for Mobile Payment.

The first regulation requests that ISPs block all child pornography websites, weapons websites, and all sites that spread hate speech,

racism and religious discrimination. The second regulation requires Mobile Payment service providers to encrypt all transactions with End-to-End Encryption.

DIGITAL ID

Sudan has had no notable Digital ID projects, but authorities have mentioned these as key several times. In April 2021, during the transitional period, the Minister of Telecom and Digital Transformation attended the first workshop on Block Chain technology in Sudan. The ministry mentioned that the workshop dealt with “the most important in Sudan, which is Digital ID”.³⁰

The acting Minister of Telecommunication and Digital Transformation visited the Civil Registry administration in July 2022. The Minister appreciated the Civil Registry’s efforts to keep up with and use digital applications and digital transformation through electronic programs. He also said they are ready to provide support to catch up with Digital ID and Digital Signature.³¹

UNIVERSAL SERVICE FUND

The Universal Service Fund Project started in Sudan in 2003 when the Information Technology Development Council was formed. It was then incorporated into the Information Technology Development Fund in the year 2005, and finally, the Universal Service Fund was established in the year 2018 according to TPRA law.³²

The regulator, TPRA, conducts annual surveys for the comprehensive service project. As of 2018, the survey targeted, for the first phase,

27 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 December 30, 2022)

28 Advox, “How the government in Sudan legalized internet categorizing and content filtering”, <https://advox.globalvoices.org/2022/08/02/how-the-government-in-sudan-legalized-internet-categorizing-and-content-filtering/>, (accessed on December 30, 2022).

29 Cipesa, “Three Years After Al-Bashir Ouster, Sudan’s Internet Freedom Landscape Remains Precarious”, <https://cipesa.org/2022/12/three-years-after-al-bashir-ouster-sudans-internet-freedom-landscape-remains-precarius/>, December 22, 2022.

30 Twitter, @MTDTSudan, <https://twitter.com/MTDTSudan/status/1380615883584901125?s=20&t=6i3JJVYGmwcG8lbdSqi3Bw>, (accessed on December 30, 2022).

31 SUNA, “The Minister of Communications praises the police’s implementation of digital transformation projects with its service transactions”, <https://www.suna-sd.net/read?id=743751>, (accessed on 29 December 2022).

32 TPRA, “Universal Service Fund”, <https://tpra.gov.sd/wp-content/uploads/2018/06/Universal-Service-Fund.pdf>, (accessed on December 14, 2022).



55 areas not covered by communication networks, in order to collect correct data and then classify them in terms of economic feasibility (17 feasible areas and 38 non-feasible areas). Economically unfeasible areas are covered with the support of the Universal Service project. As for the economically feasible areas for the operators, they are covered by the operators by including them in their annual coverage plans.³³

In the second phase, the Universal Service project aimed to survey 505 areas not covered by telecommunications networks to collect data for study and classification in terms of economic feasibility. The survey identified 168 economically non-viable areas the universal service project will cover. Then, the TPRA signed a framework agreement with Zain-SD, to cover 83 uncovered areas, and MTN-Sudan, to cover 10 uncovered areas.³⁴

In 2022, TPRA found that there are some obstacles facing the implementation of the project that could be summarised as below:³⁵

Delaying the implementation of work, which is the responsibility of the operating companies in accordance with the contracts concluded

The delay in importing devices and equipment

Other obstacles (logistical, administrative, environmental conditions, etc.)

The process of companies sharing the communication towers needs specific structural and technical specifications, and therefore the current method allows for companies to develop a design that meets the requirements of operating only one tower

Poor quality and continuity of service have been noticed on the operator's part in the service provision areas.

According to the above information provided by TPRA, the government has a clear plan and effort to expand the telecom service coverage but at the same time, it is clear that the Universal Service project is facing enormous obstacles.

Currency inflation represents the main issue that has prevented ISPs from collaborating in implementing the project, as the operation cost puts high pressure on the ISPs. Also, the Telecommunication tax is another factor. In March 2022, the Sudanese authorities raised the telecommunication Value Added Tax from 35 to 40 per cent.³⁶ This tax added more obstacles for citizens to access internet services, which affected the revenue of the ISPs and subsequently, the development efforts.

Despite these obstacles, Zain reported that it would invest US\$800 million in the next five years to develop and expand its existing network in Sudan, with plans to deploy

33 TPRA, "Universal Service Fund", <https://tpra.gov.sd/regulation-issues/%d8%a7%d9%84%d9%85%d8%b4%d8%a7%d8%b1%d9%8a%d8%b9/universal-service/>, (accessed on December 14, 2022).

34 TPRA, "Definition of Universal Service", <https://tpra.gov.sd/wp-content/uploads/2018/06/Definition-of-universal-service.pdf>, (accessed on 14 December 2022).

35 TPRA, "Consultation for the optimal model for the comprehensive service project", <https://tpra.gov.sd/wp-content/uploads/2022/03/%d8%A7%D8%B3%D8%AA%D8%B4%D8%A7%D8%B1%D8%A9-%D8%A7%D9%84%D9%86%D9%85%D9%88%D8%B0%D8%AC-%D8%A7%D9%84%D8%A7%D9%85%D8%AB%D9%84-%D9%84%D9%85%D8%B4%D8%B1%D9%88%D8%B9-%D8%A7%D9%84%D8%AE%D8%AF%D9%85%D8%A9-%D8%A7%D9%84%D8%B4%D8%A7%D9%85%D9%84%D8%A9.pdf>, (accessed on 14 December 2022).

36 Alnilin, "Increasing the added value of all telecommunications companies services in Sudan", <https://www.alnilin.com/13245648.htm>, (accessed on December 30, 2022).

new and upgraded infrastructure to prevail and fabrication. competitively in the Sudanese market.³⁷ This decision came after its rejection of the offer of Invictus, a holding company in Sudan, to buy Zain Sudan for US\$1.3 billion.³⁸

DEVELOPMENTS IN ICT AND EMERGING TECHNOLOGIES

The Sudanese government is continuing its efforts in digital transformation, but without a clear vision. According to the TPRA website, Sudan has three long-term plans for digital inclusion that include the Quarter-Century National Strategy for Communications Plan, the General National Emergency Plan, and the Broadband Plan.³⁹ The above-mentioned plans were developed early on but as at the end of the year 2022, Sudan did not have a national strategy or plan to develop Artificial Intelligence technology.

However, the Civil Registry administration is working in a continuous rhythm to digitise its services. From June 2022, Sudanese citizens could submit their applications to issue their travel passports from anywhere in Sudan through an online platform.⁴⁰ The platform enables citizens to submit their data and pay online through the E-15 system – the governmental payment system – and then wait for a notification telling them to visit the office to provide their biometric data (face photo and fingerprints). This step has solved the crisis of passports. Previously, citizens would wait for weeks in order to submit their applications, and then wait for more than a month to receive the official travel document. Moreover, in December 2022, the Ministry of Justice declared the start of working through Digital Signatures to authenticate official documents.⁴¹ This will limit document fraud

37 Developing Telecoms, "Zain commits \$800m to Sudan upgrade", <https://developingtelecoms.com/telecom-business/operator-news/14290-zain-commits-us-800m-to-sudan-upgrade.html>, (accessed on December 30, 2022).

38 Mubashir, "Zain decides not to proceed with the sale of its stake in the two companies in Sudan", <https://www.mubasher.info/news/4041783/-%D8%B2%D9%8A%D9%86-%D8%AA%D9%82%D8%B1%D8%B1-%D8%B9%D8%AF%D9%85-%D8%A7%D9%84%D9%85%D8%B6%D9%8A-%D9%82%D8%AF%D9%85%D8%A7-%D9%81%D9%8A-%D8%A8%D9%8A%D8%B9-%D8%AD%D8%B5%D8%AA%D9%87%D8%A7-%D8%A8%D8%B4%D8%B1%D9%83%D8%AA%D9%8A-%D8%A7%D9%84%D8%B3%D9%88%D8%AF%D8%A7%D9%86/>, (accessed December 17, 2022).

39 TPRA, "Plans", <https://tpra.gov.sd/regulation-issues/publications-2/qos-reports-3-2-4/>, (accessed on December 26, 2022).

40 Sudan Police E-services, "Passports services", <https://eservice.passport.gov.sd/passport/>.

41 Suna, "First electronic signature in Sudan launched at Justice Ministry", <https://suna-news.net/read?id=757645>, (accessed on December 28, 2022).

Conclusion and Recommendations

In Sudan, the authorities do not allow citizens to practice their digital rights by tightening the cyberspace using different tools which include enacting bad laws, importing and using censorship technologies, network disruptions, online information manipulation, and web content filtering. The gap in telecommunications service coverage and the reasons for that create a clear digital divide between the people in rural and urban areas, which can be considered a kind of digital repression. The government does not have any plan to keep up with modern technologies such as Artificial Intelligence.

GOVERNMENT	MEDIA	CIVIL SOCIETY
<ul style="list-style-type: none"> ▪ The government should stop network disruptions. ▪ The government should not target its citizens using spyware. ▪ The government should not withdraw media licences. ▪ The Sudanese government should amend the laws of (Combating Cybercrimes, 2018 (amendment of 2020), Press and Press Publications law of 2009, Telecommunication and Post Regulation Authority, 2018 and National Security, 2010 (amendment of 2020) which contain vague terms and imposing harsh and disproportionate punishments on State workers. ▪ The government should implement the Access to Information Act to increase access to information, which will reduce propagation of disinformation. ▪ The government 	<ul style="list-style-type: none"> ▪ The media in Sudan should continue their efforts in detecting and documenting digital authoritarianism events. ▪ Media should work to protect their staff by building strong coalitions and pushing against laws that are used to repress journalists. ▪ The Syndicate of Journalists should provide Digital Safety training to its members. 	<ul style="list-style-type: none"> ▪ Civil Society in Sudan should push forward against digital authoritarianism practices by encouraging regional and international support, mobilising the resources to put pressure on the government to stop repressing the people's rights. ▪ Civil society must raise the awareness of the Sudanese people through training and media campaigns. ▪ Civil Society should provide Digital Safety training to people targeted with spyware.

GOVERNMENT	MEDIA	CIVIL SOCIETY
<p>should reduce the telecommunication tax and ensure affordable data.</p> <ul style="list-style-type: none"> ▪ The government should get benefits from the reduced telecommunication tax by using it to develop the ICT sector. ▪ The government should work to provide the needs which will assist the telecommunication companies to cover the non-economically feasible areas. ▪ The government, using the Telecom Operation License and after providing all needs, must impose penalties on the Telecom companies which make shortcomings in their obligation with the Universal Service Fund. 		



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