

**GREAT LAKES INITIATIVE FOR HUMAN RIGHTS
AND DEVELOPMENT (GLIHD)**

**ALTERNATIVE REPORT TO THE UNITED NATIONS
HUMAN RIGHTS COMMITTEE**

**International Covenant on Civil and
Political Rights in Rwanda (ICCPR)**

Covenant Articles Addressed

2 · 7 · 9 · 10 · 14 · 18 · 19 · 21 · 22 · 24 · 26 · 27

KIGALI, RWANDA | SEPTEMBER 2026

C O N T A C T

Ms. Vestine Umulisa

Executive Director, GLIHD

T: +250 788 559 021

E: glihd.org@gmail.com

GLIHD is a Rwandan non-governmental organization working on human rights monitoring and reporting, access to justice, civic space and the rights of marginalised communities in the Great Lakes region.

Contents

1. Introduction and Methodology	3
2. Executive Summary	4
3. Legal and Policy Framework.....	4
3.1 Constitutional framework and the status of the Covenant in domestic law	5
3.2 International and regional obligations	5
3.3 Institutional architecture	6
4. Positive Developments.....	6
4.1 Engagement with international human rights mechanisms	7
4.2 Abolition of the death penalty.....	7
4.3 Ratification of the Optional Protocol to the Convention against Torture and designation of a national preventive mechanism	7
4.4 The 2026 law on the National Commission for Human Rights	8
4.5 Constitutional litigation and the narrowing of speech offences	8
4.6 Women’s political participation and gender equality	9
4.7 Access-to-justice infrastructure	9
4.8 Refugee protection	9
4.9 Access to information and digital public services	9
5. Constitutional and Institutional Framework (Article 2)	10
6. Liberty, Humane Treatment in Detention and Fair-Trial Guarantees (Articles 7, 9, 10 and 14)	11
6.1 Pre-charge detention and the 48-hour rule.....	11
6.2 Allegations of torture and ill-treatment.....	11
6.3 Access to legal aid	12
6.4 Prison and detention conditions.....	13
7. Detention on grounds of “Deviant Behaviour” and Vagrancy, including of Children (Articles 2, 7, 9, 10, 14 and 24)	14
8. Freedom of Thought, Conscience and Religion (Articles 2, 18, 23, 24, 26 and 27)	15
9. Freedom of Expression and Access to Information (Articles 9, 14 and 19)	17
10. Freedom of Peaceful Assembly and Association (Articles 19, 21 and 22)	18
10.1 The 2024 NGO Law	18
10.2 Freedom of peaceful assembly.....	20
10.3 Freedom of association in the labour sector	20
11. Summary of Recommendations to the Human Rights Committee	20

1. Introduction and Methodology

This alternative report is submitted to the United Nations Human Rights Committee to inform its constructive dialogue with the Government of Rwanda on the implementation of the International Covenant on Civil and Political Rights. Rwanda ratified the Covenant in 1975 and last appeared before the Committee in 2016, when its fourth periodic report was examined. The State party's fifth periodic report was submitted in June 2025,¹ following the Committee's adoption of a List of Issues Prior to Reporting (LOIPR) at its 144th session.²

This report has been compiled through desk review of primary legal instruments, government policy documents, Universal Periodic Review (UPR) records, treaty body observations, and consultations with civil society organizations (CSOs), human rights defenders (HRDs), journalists, and community representatives who work on civic space, freedom of expression, and the rights of detained and marginalized persons in Rwanda. It is organized thematically, tracking the substantive articles of the Covenant and the specific issues flagged in the LOIPR, rather than reproducing the State party's own narrative.

GLIHD recognizes that Rwanda has made genuine and, in several respects, internationally recognized progress: a modernized constitutional and legislative architecture, gender parity in political representation, expanding digital public services, and sustained macroeconomic and security stability following the 1994 genocide against the Tutsi. This report does not dispute that progress. Its purpose is narrower and more specific: to document, with the best available evidence, the areas in which the practical enjoyment of civil and political rights continues to fall short of Covenant standards, and to propose concrete, implementable recommendations that the Committee may wish to put to the State party.

Rwanda's institutional capacity to legislate is strong; the space of independent scrutiny of how those laws are applied in practice remains low. Big part of this report, looks at the substantive clusters of issues identified in the Committee's List of Issues Prior to Reporting: the constitutional and institutional framework; liberty, detention, torture, and fair-trial guarantees; the administrative detention of persons on grounds of "deviant behaviour" or vagrancy, including children; the situation of asylum-seekers and persons in immigration detention; prison conditions and the Legal Aid Policy; freedom of thought, conscience and religion; freedom of expression, including the pending revision of the national Media Policy; and freedom of peaceful assembly and association, including the 2024 Law Governing Non-Governmental Organisations. A final section addresses civic space and human rights defenders more broadly, and the situation of Historically Marginalised Peoples, as cross-cutting concerns that inform the Committee's understanding of several of the specific issues above.

GLIHD is conscious that the Committee's dialogue with Rwanda takes place against a backdrop in which the State party has, in other multilateral fora, demonstrated a willingness to engage substantively with recommendations. Rwanda's Universal Periodic Review record shows a pattern of accepting the majority of recommendations it receives, even where subsequent implementation has been partial. This report is offered in that same spirit: not as an indictment, but as a technical and evidentiary contribution intended to help the Committee

¹ UN Human Rights Committee, *fifth periodic report submitted by Rwanda under article 40 of the Covenant, due in 2019*, CCPR/C/RWA/5, received 10 June 2025, issued 31 July 2025 (reissued 15 August 2025).

² UN Human Rights Committee, List of Issues Prior to Reporting in relation to the fifth periodic report of Rwanda, adopted at the Committee's 144th session, Geneva, 23 June–25 July 2025.

formulate precise, actionable, and monitorable recommendations that can be tracked in subsequent reporting cycles.

2. Executive Summary

GLIHD's principal concerns, elaborated below, are that:

- The legal and institutional framework, while reformed, continues to concentrate wide discretionary power in executive and quasi-executive bodies (notably the Rwanda Governance Board, "RGB") over the registration, governance, and continued operation of non-governmental organizations, media houses, and faith-based organizations, with limited independent or judicial checks (Articles 19, 21, 22).
- Pre-trial and administrative detention practices, including a permissive 48-hour rule that is not consistently respected, prolonged remand detention, and the continued operation of "transit" or "rehabilitation" centres holding people accused of vaguely defined "deviant behaviours" such as vagrancy, informal street vending, and begging, raise concerns under Articles 7, 9, 10, 14 and 24.
- Prison and detention conditions, particularly overcrowding and uneven access to health care, sanitation, and rehabilitation programming, require sustained attention under Article 10, with specific vulnerabilities for women, children, and persons with disabilities.
- Access to justice remains limited for indigent litigants despite a Legal Aid Policy, owing to funding gaps, an uneven network of legal aid providers, and unclear eligibility administration.
- Restrictions on freedom of thought, conscience, and religion, most visibly the 2018 Law on Faith-Based Organisations and its 2024–2025 enforcement wave that closed thousands of places of worship, have not been matched by transparent, individualized, and appealable administrative process (Articles 2, 18, 26, 27).
- Limited freedom of expression and media freedom due to the unrevised 2011 Media Policy, cybercrime legislation with broad and imprecise offences, and a climate of self-censorship documented in successive Rwanda Media Barometer assessments (Articles 9, 14, 19).
- The 2024 Law Governing Non-Governmental Organisations (Law No. 058/2024) significantly expands RGB's discretion to approve or reject leadership changes, request wide-ranging information, suspend registration, and revoke legal personality, on grounds that are not always precisely defined, without a clear, expeditious, and independent avenue of appeal (Articles 19, 21, 22).

Each theme is discussed below with reference to the relevant Covenant articles, the LOIPR questions to which it corresponds, and recommendations for the Committee's consideration.

3. Legal and Policy Framework

This chapter sets out the legal and policy architecture through which Rwanda gives effect to the Covenant. It is descriptive rather than critical: its purpose is to establish an agreed baseline, so that the concerns raised later in this report can be read as concerns about the operation of a framework rather than about its absence. GLIHD's view, developed in the chapters that follow, is that Rwanda's difficulty under the Covenant is rarely a shortage of law. It is more often the breadth of the discretion that the law confers, the limited availability of independent review of

how that discretion is exercised, and the gap between the standard set out in an instrument and the experience of the person to whom it is applied.

3.1 Constitutional framework and the status of the Covenant in domestic law

The Constitution of the Republic of Rwanda contains an extensive bill of rights.³ It guarantees, among others, the right to life, physical and mental integrity, equality before the law and non-discrimination, liberty and security of the person, the presumption of innocence and fair-trial guarantees, privacy, freedom of thought, conscience and religion, freedom of expression and access to information, and freedom of peaceful assembly and association. It further assigns to the State the responsibility of promoting human rights and entrusts that responsibility to the National Commission for Human Rights.

Rwanda follows a broadly monist approach. International agreements that have been duly ratified and published form part of domestic law and, under the constitutional hierarchy of norms, rank above ordinary legislation, though below the Constitution and organic laws. The Covenant was ratified by Decree-Law No. 8/75 of 12 February 1975, and the instrument of accession was deposited on 16 April 1975.⁴ It follows that the Covenant is in principle directly invocable before Rwandan courts, and that an ordinary law inconsistent with it should yield. As noted in Chapter 5, GLIHD is not aware of a developed body of jurisprudence in which that hierarchy has been used to expand protection beyond what domestic statute already provides.

Two features of Rwanda's engagement with individual complaint mechanisms are relevant to the Committee's assessment of remedies under article 2(3). First, Rwanda has not ratified the Optional Protocol to the Covenant; individuals in Rwanda therefore have no access to the individual communications procedures of the Covenant. Second, on 29 February 2016 Rwanda deposited the withdrawal of its declaration under article 34(6) of the Protocol establishing the African Court on Human and Peoples' Rights, ending the ability of individuals and non-governmental organisations to bring cases against Rwanda directly before that Court.⁵ The combined effect is that a person in Rwanda who has exhausted domestic remedies has no international or regional forum in which to bring an individual complaint against the State party.

3.2 International and regional obligations

Rwanda is a party to most of the core United Nations human rights treaties, including the International Covenant on Economic, Social and Cultural Rights and the International Convention on the Elimination of All Forms of Racial Discrimination (both 1975), the Convention on the Elimination of All Forms of Discrimination against Women (1981) and its Optional Protocol, the Convention on the Rights of the Child (1991) and its Optional Protocols, and the Convention against Torture, the Convention on the Rights of Persons with Disabilities and the Second Optional Protocol to the Covenant aiming at the abolition of the death penalty (all 2008). Rwanda ratified the Optional Protocol to the Convention against Torture in June

³ Constitution of the Republic of Rwanda

⁴ International Covenant on Civil and Political Rights, ratified by Decree-Law no. 8/75 of 12 February 1975; instrument of accession deposited with the Secretary-General on 16 April 1975. Rwanda has not signed or ratified the Optional Protocol to the Covenant.

⁵ Withdrawal of the declaration made under article 34(6) of the Protocol to the African Charter on Human and Peoples' Rights on the Establishment of an African Court on Human and Peoples' Rights, deposited 29 February 2016; see Joint Civil Society Statement on Rwanda's Withdrawal of its Article 34(6) Declaration, 17 March 2016.

2015 and designated the National Commission for Human Rights as its national preventive mechanism by a law that entered into force on 17 September 2018.⁶

At the regional level Rwanda is a party to the African Charter on Human and Peoples' Rights, the Protocol to the African Charter on the Rights of Women in Africa, and the African Charter on the Rights and Welfare of the Child, and it participates actively in the Universal Periodic Review. Reporting to the treaty bodies is coordinated through a standing National Mechanism for Implementation, Reporting and Follow-up, which brings together the Ministry of Justice and the line institutions responsible for implementation. GLIHD regards that mechanism as a constructive feature of the State party's practice and returns to it in Chapter 4.

3.3 Institutional architecture

The institutions most relevant to this report are: the National Commission for Human Rights, which holds "A status" accreditation, serves as the national preventive mechanism, and now operates under a law promulgated on 11 June 2026;⁷ the Office of the Ombudsman, which handles maladministration and corruption complaints; the Rwanda Investigation Bureau and the National Public Prosecution Authority; the Rwanda Correctional Service and the National Rehabilitation Service, which between them operate the custodial and administrative-detention estate; the Rwanda Governance Board, which registers and supervises non-governmental organisations, faith-based organisations and political-party-adjacent civic structures; the Rwanda Media Commission, the statutory self-regulatory body for the media; and the judiciary, including the Supreme Court, which exercises constitutional review of legislation.

Two observations about this architecture recur throughout the report. The first is that several of these bodies combine regulatory, supervisory and sanctioning functions in relation to the same organisations, without an intervening independent decision-maker. The second is that the administrative decisions with the greatest practical effect on Covenant rights, refusal of registration, suspension of legal personality, closure of a place of worship, or placement in a rehabilitation centre, are in several instances taken by an executive or quasi-executive body and are not subject to an expeditious, suspensive and independent route of appeal. These are questions of institutional design rather than of intent, and they are, for that reason, amenable to the kind of concrete remedial recommendation set out in Chapter 11.

4. Positive Developments

GLIHD considers that an alternative report is more useful to the Committee when it records progress accurately. This chapter sets out developments that GLIHD regards as genuine improvements in the protection of civil and political rights in Rwanda during the reporting period. Several of them are directly responsive to recommendations made by this Committee, by other treaty bodies, or through the Universal Periodic Review, and they demonstrate that the State party is capable of legislative and institutional change when it decides that change is

⁶ Optional Protocol to the Convention against Torture, instrument of ratification deposited June 2015; Law no. 61/2018 of 24/08/2018 determining missions, organisation and functioning of the National Commission for Human Rights, in force 17 September 2018, conferring the national preventive mechanism mandate; Association for the Prevention of Torture, country information on Rwanda.

⁷ Law governing the National Commission for Human Rights, promulgated and published in the Official Gazette on 11 June 2026, repealing Law no. 19/2013 of 25/03/2013 as amended by Law no. 61/2018 of 24/08/2018.

warranted. That capability is the premise of the recommendations in the remainder of this report.

4.1 Engagement with international human rights mechanisms

The State party submitted its fifth periodic report under the simplified reporting procedure in June 2025, following the Committee's adoption of a List of Issues Prior to Reporting. Rwanda also completed the fourth cycle of its Universal Periodic Review, concluding the interactive dialogue on 21 January 2026; the Human Rights Council adopted the outcome on 30 June 2026, with Rwanda accepting 249 of the 286 recommendations it received.⁸ Reporting is coordinated through a standing national mechanism, and the State party has, in successive cycles, engaged substantively rather than defensively with the recommendations addressed to it.

GLIHD notes this record without qualification and observes that a high acceptance rate creates its own measurement problem: what matters to rights-holders is implementation. GLIHD accordingly encourages the Committee to frame its concluding observations in terms that can be verified against published data in the next cycle, which is the approach taken in the recommendations throughout this report.

4.2 Abolition of the death penalty

Rwanda abolished the death penalty in 2007, commuting existing sentences, and acceded to the Second Optional Protocol to the Covenant, aiming at the abolition of the death penalty, in December 2008.⁹ This remains one of the most significant and irreversible advances in the protection of the right to life in the region, and it was achieved in the immediate aftermath of the 1994 genocide against the Tutsi, when the domestic pressure to retain capital punishment was considerable. GLIHD invites the Committee to acknowledge this explicitly.

4.3 Ratification of the Optional Protocol to the Convention against Torture and designation of a national preventive mechanism

Rwanda deposited its instrument of ratification of the Optional Protocol to the Convention against Torture in June 2015 and, by a law in force since 17 September 2018, conferred the mandate of national preventive mechanism on the National Commission for Human Rights, empowering it to visit any place of deprivation of liberty with or without notice.¹⁰ The existence of a standing domestic monitoring mandate is a material advance on the position at the time of the Committee's previous review.

GLIHD records, for completeness and because the Committee will wish to have the full picture, that the Subcommittee on Prevention of Torture suspended its visit to Rwanda in October 2017, citing restrictions on access to certain places of detention, difficulties in conducting

⁸ Universal Periodic Review of Rwanda, fourth cycle: interactive dialogue concluded 21 January 2026; outcome adopted by the Human Rights Council on 30 June 2026, with 249 of 286 recommendations accepted.

⁹ Organic Law no. 31/2007 of 25/07/2007 relating to the abolition of the death penalty; Second Optional Protocol to the International Covenant on Civil and Political Rights, aiming at the abolition of the death penalty, acceded to on 15 December 2008.

¹⁰ Optional Protocol to the Convention against Torture, instrument of ratification deposited June 2015; Law no. 61/2018 of 24/08/2018 determining missions, organisation and functioning of the National Commission for Human Rights, in force 17 September 2018, conferring the national preventive mechanism mandate; Association for the Prevention of Torture, country information on Rwanda.

confidential interviews, and fears of reprisals expressed by persons interviewed.¹¹ The Committee may wish to ask the State party what has changed in the intervening period, and whether it would now welcome a resumed visit. A positive answer would consolidate the advance represented by the 2015 ratification.

4.4 The 2026 law on the National Commission for Human Rights

A new law governing the National Commission for Human Rights was promulgated and published in the Official Gazette on 11 June 2026, repealing the 2013 legislation as amended.¹² The law sets out the Commission's responsibilities in greater detail, places additional emphasis on preventive work including human rights education, training, outreach and advice on draft laws and policies, and extends legal protection to Commission staff for opinions expressed and acts performed in the exercise of their functions. The Commission was also re-accredited with "A status" by the Global Alliance of National Human Rights Institutions.

GLIHD welcomes both developments. Their value will depend on two things that the Committee is well placed to probe: whether the Commission receives resourcing commensurate with its expanded mandate, and whether the appointment process and budget line give it independence that is visible to complainants as well as formally secured. Those questions are taken up in Chapter 5.

4.5 Constitutional litigation and the narrowing of speech offences

The 2018 Penal Code decriminalised ordinary defamation and removed vagrancy and begging from the list of criminal offences. In a judgment of 24 April 2019 on a constitutional petition brought by a private lawyer, the Supreme Court struck down the provision criminalising the humiliation of national authorities and persons in charge of public service, together with the provision on public defamation of religious rituals, holding them incompatible with the Constitution.¹³ The case is significant beyond its outcome: it shows that constitutional review of legislation is available in practice, that a petition may be brought by a citizen without a direct personal grievance, and that the State accepted the result.

GLIHD notes two qualifications that the Committee will wish to weigh. The offence of insulting or defaming the President was retained, and in June 2025 the Supreme Court rejected a constitutional challenge to article 39 of the 2018 cybercrime law.¹⁴ The concerns set out in Chapter 9 therefore persist. But the 2019 judgment establishes that the domestic route for narrowing over-broad speech offences is real, and GLIHD considers that the Committee can properly encourage the State party to complete that process legislatively rather than case by case.

¹¹ UN Subcommittee on Prevention of Torture, "Prevention of Torture: UN human rights body suspends Rwanda visit citing obstructions," press release, 20 October 2017.

¹² Law governing the National Commission for Human Rights, promulgated and published in the Official Gazette on 11 June 2026, repealing Law no. 19/2013 of 25/03/2013 as amended by Law no. 61/2018 of 24/08/2018.

¹³ Supreme Court of Rwanda, judgment of 24 April 2019 on the constitutional petition of Richard Mugisha, invalidating article 233 (humiliation of national authorities and persons in charge of public service) and article 154 (public defamation of religious rituals) of Law no. 68/2018 of 30/08/2018.

¹⁴ Supreme Court of Rwanda, judgment of June 2025 rejecting the constitutional challenge to article 39 of Law no. 60/2018 of 22/08/2018 on the prevention and punishment of cybercrimes; see International Center for Not-for-Profit Law, Civic Freedom Monitor, Rwanda.

4.6 Women's political participation and gender equality

Following the July 2024 elections, women hold 51 of the 80 seats in the Chamber of Deputies, or 63.8 per cent, against a constitutional minimum of 30 per cent, and are substantially represented in the Senate and Cabinet.¹⁵ Rwanda continues to lead globally on this indicator. The supporting framework, including the Gender Monitoring Office, the gender-based violence legislation and the Isange One Stop Centres, which provide integrated medical, psychosocial, police and legal services to survivors of gender-based violence, represents a serious institutional commitment rather than a formal one.

GLIHD raises specific concerns about the treatment of women in detention in Chapter 6, and considers these compatible with, rather than contradictory to, the recognition above. Descriptive representation in the legislature and the conditions experienced by an indigent woman on remand are distinct questions, and progress on the first does not answer the second.

4.7 Access-to-justice infrastructure

Rwanda has built an access-to-justice architecture that is unusual in the region for its reach: elected Abunzi mediation committees at cell and sector level, which resolve a substantial proportion of civil disputes before they reach the courts; Access to Justice Bureaus in the districts providing legal information and assistance; an accredited legal aid sector coordinated with the Bar Association and the Legal Aid Forum; and an integrated electronic case management system that has reduced file loss and shortened some procedural timelines. Criminal procedure now provides for plea agreements, and community service is available as an alternative to short custodial sentences.

These are real institutional assets. GLIHD's concerns in Chapter 6 concern the funding, geographic distribution and eligibility administration of legal aid, and the under-use of non-custodial alternatives in practice, rather than the design of the system itself.

4.8 Refugee protection

Rwanda hosts a substantial refugee population, principally from the Democratic Republic of the Congo and Burundi, under a legal framework that affords refugees freedom of movement and the right to work, and progressively includes them in the national health insurance scheme and the national education system rather than maintaining parallel services. Rwanda also established, with the United Nations High Commissioner for Refugees and the African Union, an emergency transit mechanism for evacuees from Libya. These are meaningful commitments with real fiscal cost, and they distinguish Rwanda from a number of States in the region.

4.9 Access to information and digital public services

The 2013 Access to Information Law establishes a right of access to information held by public organs and certain private bodies, and the migration of public services to digital platforms has reduced the discretion of individual officials over routine administrative decisions, which is itself a rule-of-law gain. The periodic Rwanda Media Barometer assessment, conducted through a multi-stakeholder process involving media practitioners, regulators and civil society, provides a shared evidentiary basis for discussing media freedom, and GLIHD relies on it in Chapter 9.

¹⁵ National Electoral Commission results, July 2024; Inter-Parliamentary Union, Parline database, Rwanda Chamber of Deputies (51 women of 80 members).

GLIHD invites the Committee to reflect these developments in its concluding observations. The chapters that follow identify areas in which the practical enjoyment of Covenant rights continues to fall short, and they are offered in the knowledge that the State party has repeatedly shown itself able to legislate and to build institutions at speed. The question this report puts before the Committee is not whether Rwanda can act, but whether the specific discretionary powers, detention practices and review mechanisms described below can be brought into conformity with the Covenant within the next reporting cycle.

5. Constitutional and Institutional Framework (Article 2)

The Constitution of the Republic of Rwanda and a dense body of implementing legislation formally guarantee the rights protected by the Covenant, and Rwandan courts may in principle apply the Covenant directly. In practice, civil society is not aware of a body of jurisprudence in which ordinary courts have invoked the Covenant to expand protection beyond what domestic statute already provides, and legal practitioners report that judicial and prosecutorial training on the Covenant's provisions is inconsistent. Rwanda has not ratified the Optional Protocol to the ICCPR, and individuals in Rwanda therefore have no access to the Committee's individual communications procedure, a gap civil society has consistently urged the State party to close.

The National Commission for Human Rights (NCHR), now governed by the law promulgated on 11 June 2026 which repealed Law No. 19/2013, retains "A status" accreditation from the Global Alliance of National Human Rights Institutions, but its practical independence is constrained by a selection process in which the executive retains substantial influence, by a headquarters-only physical presence that limits its capacity to receive complaints from rural and border communities, and by budgetary dependence on the State. Civil society supports the recommendation, raised repeatedly in UPR cycles, that the NCHR establish regional or provincial offices and receive a budget line commensurate with an expanded field presence. Civil society is also concerned that the Commission has, in several documented instances, reached conclusions regarding allegations of ill-treatment by law-enforcement that diverge from independent findings by international human rights organizations, without the Commission publishing the underlying evidentiary basis for its conclusions. The Committee may wish to ask the State party to clarify the Commission's investigative methodology, its powers to compel testimony and access places of detention unannounced, and the process by which its findings on individual complaints against public officials are made public and subject to independent review.

GLIHD also draws the Committee's attention to the pace and consultative quality of law reform generally. Several of the laws discussed in this report, the 2018 Law on Faith-Based Organisations, the 2018 Cybercrime Law, and the 2024 NGO Law, were each adopted following formal parliamentary process, including committee review, but civil society organizations report that the period available for external stakeholder input before adoption was, in each case, compressed relative to the complexity and rights-sensitivity of the subject matter, and that draft texts were not always made available sufficiently far in advance of adoption to allow for substantive technical comment to be meaningfully incorporated. Civil society recommends that the Committee ask the State party to describe its standard practice for public consultation on draft legislation affecting Covenant rights, including minimum comment periods and mechanisms for incorporating stakeholder feedback into final texts.

Recommended questions to the State party: What concrete measures are planned to establish NCHR regional offices, and on what timeline? What percentage of NCHR's budget is subject

to parliamentary rather than executive approval? How many complaints against law-enforcement or security personnel has the Commission received, investigated, and substantiated in the reporting period, disaggregated by outcome? What is the State party's standard minimum consultation period for legislation materially affecting the rights protected by Articles 18, 19, 21 and 22 of the Covenant, and how is stakeholder input documented and addressed in the final adopted text?

Recommendations to the State party:

- Establish NCHR offices in at least four provinces, each staffed with dedicated complaint-intake personnel, and report on their caseload in the Commission's next annual report.
- Transfer NCHR's core budget allocation from executive discretion to a ring-fenced line requiring parliamentary approval and publish the approved figure alongside the national budget.
- Publish an annual, disaggregated report on complaints received against public officials showing numbers investigated, substantiated, and referred for prosecution or discipline.
- Adopt and publish a standing rule requiring a minimum 30-day public comment period, with draft texts posted online, for any legislation materially affecting rights under Articles 18, 19, 21 or 22.

6. Liberty, Humane Treatment in Detention and Fair-Trial Guarantees (Articles 7, 9, 10 and 14)

6.1 Pre-charge detention and the 48-hour rule

Rwandan criminal procedure formally limits police custody before a suspect must appear before a judicial authority to 48 hours (extendable in narrowly defined circumstances). Civil society organizations working with detainees and their families report that this limit is not uniformly observed, particularly in cases characterized by the authorities as touching on state security, genocide ideology, or "public order," where individuals have reportedly been held for longer periods. In some instances, family members and lawyers have reported difficulty establishing the whereabouts of a detained relative within the initial 48-hour window, which in practice can nullify the protective purpose of the rule even where the formal deadline for judicial appearance is eventually met. Civil society asks the Committee to request disaggregated statistics on the average duration of police custody prior to judicial appearance, by category of offence, and information on any administrative or disciplinary consequences for non-compliance with statutory custody limits.

Recommendation: Roll out a centralized, time-stamped electronic custody-registration system covering all police and RIB detention points, generating automatic alerts when the 48-hour threshold is approaching, and publish quarterly aggregate compliance statistics disaggregated by district and offence category.

6.2 Allegations of torture and ill-treatment

Reports consulted continue to document allegations of ill-treatment in relation to street-connected people and informal traders, of local security structures such as District Administration Security Support Organs (DASSO). Allegations concentrate around the period immediately following arrest and before formal registration, and include beatings, prolonged stress positions, and the withholding of food, water, or medical attention. The State party's

public position is that such allegations are isolated and are investigated when reported. Civil society's concern is less about the existence of an investigative framework on paper than about its independence and transparency in practice: complaints against security personnel are frequently investigated by bodies institutionally linked to those personnel, outcomes are rarely published in a form that allows external verification, and complainants.

GLIHD recommends that the Committee ask the State party to describe the institutional independence of bodies mandated to investigate torture allegations against RIB, police, and DASSO; to provide statistics on complaints received, investigated, and prosecuted in the reporting period.

GLIHD further notes that Rwanda's domestic definition of torture and the penalties attached to it in the Penal Code should, in the Committee's assessment, be benchmarked explicitly against the definition in Article 1 of the Convention against Torture, to which Rwanda is also a party, to confirm that all elements, including the involvement or acquiescence of a public official, and the absence of a statute of limitations for the gravest cases, are fully captured.

Recommendations to the State party:

- Transfer investigation of torture and ill-treatment complaints
- Establish a confidential, non-retaliatory complaint channel for detainees and their families, accessible without requiring in-person attendance at the implicated facility.

6.3 Access to legal aid

Rwanda's Legal Aid Policy and the network of accredited legal aid providers, including the Legal Aid Forum and paralegal structures at sector level, represent a genuine institutional achievement relative to many countries in the region. Nonetheless, civil society organizations providing legal aid report that the promised Legal Aid Fund remains under-capitalized relative to demonstrated need, that geographic coverage is uneven, concentrated in Kigali and provincial capitals, and that eligibility screening for free legal assistance is applied inconsistently across sectors, sometimes based on informal assessments of indigence rather than clear published criteria. This matters directly for the effective exercise of fair-trial guarantees under Article 14, since defendants unable to secure funded counsel, particularly outside Kigali, may face trial or plea decisions without adequate legal advice.

GLIHD notes in particular that the categories of case for which legal aid is prioritized, historically weighted toward matters connected to the justice sector's genocide-related caseload and toward specified categories of vulnerable litigant such as women in gender-based violence cases and children, while reflecting legitimate policy priorities, have left comparatively thin coverage for ordinary criminal defendants facing non-capital, non-genocide-related charges, who form the large majority of the current remand and sentenced prison population discussed in the preceding subsection. GLIHD considers that strengthening legal aid coverage for this broader defendant population would have a direct and measurable effect on both the fairness of individual proceedings and, over time, on remand overcrowding, since access to competent counsel at the earliest stage of proceedings is strongly correlated with the effective use of bail and other alternatives to pre-trial detention.

GLIHD recommends that the Committee ask the State party for the current capitalization and disbursement figures of the Legal Aid Fund, the geographic distribution of accredited legal aid providers relative to case load, the published eligibility criteria applied for the appointment of

funded counsel, and the proportion of criminal defendants who are represented by counsel at the point of first judicial appearance, disaggregated by province.

Recommendations to the State party:

- Capitalize the Legal Aid Fund to a level sufficient to guarantee at least one accredited legal aid provider per district, with progress published annually against a fixed funding target.
- Publish uniform, written indigence-eligibility criteria for funded counsel, replacing informal case-by-case assessment, and train all accredited providers and court registrars on the published criteria.
- Extend funded legal representation at first judicial appearance to all non-capital criminal defendants, prioritizing the two provinces with the lowest current provider-to-caseload ratio.

6.4 Prison and detention conditions

Rwanda's prison population has grown substantially over the past decade, driven in part by the scale of genocide-related prosecutions historically and, more recently, by remand populations awaiting trial. Civil society organizations that have visited or received first-hand accounts from correctional facilities report continuing overcrowding in several facilities, with cell occupancy above design capacity, and uneven access to potable water, adequate bedding, and sanitation, particularly in older facilities. Health care provision, while present, is reported to be under-resourced relative to caseload, with delays in referral for conditions requiring specialist or hospital-level care. Programming for rehabilitation and reintegration is described as inconsistent across facilities, and women prisoners and prisoners with disabilities in several facilities reportedly lack access to gender and disability-appropriate sanitary and medical provision. GLIHD welcomes any use of alternatives to pre-trial detention, such as bail and community-based supervision, but reports that such alternatives remain the exception rather than the rule in practice, contributing to remand overcrowding.

GLIHD recommends that the Committee request current, facility-disaggregated occupancy data against design capacity; information on steps taken to expand the use of alternatives to detention consistent with the presumption of liberty; and details of independent, unannounced monitoring visits to places of detention, including whether civil society or the NCHR retain unimpeded access.

Civil society also highlights the specific situation of women and girls in detention. Reports gathered from paralegals and family members indicate that women's wings in correctional facilities are smaller and older than the male sections of the same institution, resulting in comparatively higher effective occupancy density; that access to gender-appropriate hygiene items is inconsistent and sometimes dependent on family provision rather than guaranteed State supply; and that arrangements for women detained with infant children, while formally provided for, vary in the adequacy of paediatric care and nutrition across facilities. Persons with physical, sensory, or psychosocial disabilities in detention reportedly face difficulty accessing facilities that are not physically adapted, and mental-health support within correctional facilities is described by civil society interlocutors as significantly under-resourced relative to documented need.

GLIHD recommends that the Committee additionally request disaggregated data on the proportion of women, children accompanying detained mothers, and persons with disabilities across correctional facilities, together with facility-specific information on gender- and

disability-appropriate infrastructure and services; and information on the availability, staffing, and resourcing of mental-health and psychosocial support services within the correctional system.

Recommendations to the State party:

- Bring the most overcrowded correctional facilities below 110% of design capacity, through a combination of expanded bail, non-custodial sentencing, and, where necessary, capital investment, with progress reported annually.
- Adopt a presumption in favour of bail or non-custodial supervision for defendants charged with non-violent offences and publish the resulting change in the remand-to-sentenced population ratio after one year.
- Guarantee a minimum standard package of gender-appropriate hygiene supplies, free of charge, in every woman's wing, and complete a disability-accessibility audit of all correctional facilities, publishing a costed remediation plan.
- Establish at least one qualified mental-health/psychosocial support post per correctional facility, prioritizing facilities with documented genocide-related trauma caseloads.

7. Detention on grounds of “Deviant Behaviour” and Vagrancy, including of Children (Articles 2, 7, 9, 10, 14 and 24)

A distinct and long-standing concern relates to the administrative detention of persons, adults and children, characterized under Rwandan policy as exhibiting “deviant behaviours,” a category that has been defined in implementing instruments to include street vending without authorization, begging, vagrancy, and, for adults, sex work and drug use. Although “vagrancy” and “begging” were removed as criminal offences from the 2018 Penal Code, subsequent legislation establishing the National Rehabilitation Service preserved the underlying practice through an administrative, rather than criminal, detention track. Under this framework, individuals, including children, may be picked up by local security personnel and held at “transit” or “rehabilitation” centres, without an arrest warrant, without prompt appearance before a judge, and without access to a lawyer or guardian at the point of detention.¹⁶

The United Nations Committee on the Rights of the Child has previously called on Rwanda to take urgent measures to end arbitrary detention of children in transit centres and to investigate allegations of ill-treatment.¹⁷ In late 2019, the African Court on Human and Peoples' Rights issued an advisory opinion, in response to a request concerning laws permitting the detention of persons on grounds of “vagrancy,” finding that laws enabling the summary or warrantless detention of persons for reasons connected to poverty or homelessness are incompatible with the African Charter on Human and Peoples' Rights and related instruments.¹⁸ GLIHD considers that the same reasoning applies with equal force to Article 9 of the Covenant, which requires that any deprivation of liberty be on grounds and in accordance with procedures established by

¹⁶ African Court on Human and Peoples' Rights, Advisory Opinion on laws permitting detention on grounds of vagrancy, requested by the Pan African Lawyers Union, delivered 4 December 2019; see also Human Rights Watch, “Rwanda Should Stop Locking Up the Poor,” 21 December 2020.

¹⁷ UN Committee on the Rights of the Child, Concluding Observations on Rwanda, February 2020, calling for urgent measures to end arbitrary detention of children in transit centres.

¹⁸ African Court on Human and Peoples' Rights, Advisory Opinion on laws permitting detention on grounds of vagrancy, requested by the Pan African Lawyers Union, delivered 4 December 2019; see also Human Rights Watch, “Rwanda Should Stop Locking Up the Poor,” 21 December 2020.

law, that it not be arbitrary, and that anyone detained be promptly informed of the reasons and brought promptly before a judicial officer; and to Article 24, which requires special measures of protection for children.

GLIHD urges the Committee to press the State party on: the current legal basis and average and maximum duration of detention at transit and rehabilitation centres; whether any judicial or independent administrative body reviews individual detention decisions before or during detention; the total number of children detained in such centres in the reporting period and their average length of stay; the outcome of any investigations into allegations of ill-treatment at these facilities; and concrete plans, if any, to close or fundamentally reform the transit-centre system in line with the African Court's advisory opinion and Article 9 and 24 of the Covenant.

Recommendations to the State party:

- Amen the legal framework establishing the National Rehabilitation Service to remove “vagrancy,” begging, and informal street vending from the list of “deviant behaviours” triggering administrative detention, in line with the African Court’s 2019 advisory opinion.
- Immediately end the detention of children and transition child protection responses for street-connected children to voluntary, community- and family-based services delivered in partnership with child-focused NGOs, with no child held without individualized judicial authorization.
- Cap any permissible administrative detention pending rehabilitation intake at a fixed short maximum (e.g., 72 hours) subject to mandatory judicial review before any further detention and publish the resulting average detention duration quarterly.
- Commission an independent investigation, with published findings and terms of reference agreed with civil society, into historical allegations of ill-treatment in transit centres, and report on any resulting accountability measures.

8. Freedom of Thought, Conscience and Religion (Articles 2, 18, 23, 24, 26 and 27)

Rwanda’s 2018 Law Determining the Organisation and Functioning of Faith-Based Organisations introduced a comprehensive regulatory regime for churches, mosques, and other places of worship, including requirements that clergy hold accredited theological qualifications, that buildings meet specified safety, hygiene, soundproofing, and parking standards, and that religious organizations register formally and disclose their sources of funding.¹⁹ A five-year compliance period, originally intended to allow existing congregations to meet these standards, lapsed in 2023, and the Rwanda Governance Board thereafter intensified enforcement. Government figures indicate that inspections of more than 13,000 places of worship conducted between July and August 2024 resulted in the closure of approximately 7,700 to nearly 10,000 churches, alongside roughly 100 mosques, for non-compliance, with Pentecostal congregations disproportionately affected.²⁰ Amendments to the regulatory framework followed in 2025.²¹

¹⁹ Law Determining the Organisation and Functioning of Faith-Based Organisations, Official Gazette, 2018.

²⁰ World Evangelical Alliance, *Rwanda: Freedom of Religion or Belief — Report to the UPR 51st Session*, submitted 16 July 2025; Religion News Service, “Members of shuttered Rwandan churches gather in homes as leaders quietly protest,” 5 September 2024.

²¹ Civil society monitoring of 2025 amendments to faith-based organisation regulations, RGB administrative practice.

The State party has justified these closures on public-safety grounds, citing risks from inadequate building infrastructure and past incidents in which structurally unsound places of worship caused injury or death. GLIHD does not dispute that legitimate safety regulation of places of public assembly falls within the State's authority and may constitute a permissible limitation on the manifestation of religion or belief under Article 18(3), provided such limitations are prescribed by law, necessary, and proportionate. GLIHD's concern is that the scale and pace of closures, several thousand within a matter of weeks, combined with reported inconsistency in the application of standards, the absence in many cases of a graduated response (such as a warning or a defined remediation period before closure), and the qualification requirement that clergy hold specific theological degrees, together raise questions about whether the measures as implemented meet the necessity and proportionality tests under Article 18(3), and whether affected congregations have access to a prompt, independent, and effective avenue to contest an individual closure decision. Congregants from several closed churches report continuing to worship informally in private homes for fear of legal consequence, which itself indicates a chilling effect on the practical enjoyment of the right to manifest religion in community with others, protected under Articles 18 and, in conjunction, 21 and 22.²²

Smaller and minority religious communities report that the qualification and infrastructure requirements, designed with larger, better-resourced congregations in mind, are particularly difficult for small rural congregations to meet, raising a distinct concern about indirect discrimination in the practical effect of a facially neutral regulatory regime, relevant to Article 26 read together with Article 18.

GLIHD recommends that the Committee ask the State party to: provide the current, updated total number and denominational breakdown of places of worship closed since 2023 and the number subsequently reopened after remediation; describe the appeal mechanism available to an individual congregation contesting a closure decision, clarify the evidentiary and procedural basis for the requirement that clergy hold specific academic qualifications, and how this requirement is applied to smaller, community-based, and minority religious traditions; and indicate what graduated enforcement measures, short of closure, are available and how frequently they are used in practice.

Recommendations to the State party:

- Adopt a mandatory graduated-enforcement protocol requiring a written warning and a minimum 90-day remediation period before any place of worship is closed for non-safety-critical infractions, reserving immediate closure for facilities posing an imminent, demonstrable danger to life.
- Establish an appeals body independent of the RGB, with a 30-day statutory decision deadline, to hear challenges to individual closure decisions, and publish its decisions.
- Review the clergy theological-qualification requirement to permit equivalent, experience- or apprenticeship-based accreditation pathways for leaders of small, rural, or minority congregations who lack access to accredited institutions.
- Publish and update quarterly, a denomination-disaggregated public registry of closed and reopened places of worship, including the stated grounds for each closure.

²² Religion News Service, 5 September 2024, op. cit.

9. Freedom of Expression and Access to Information (Articles 9, 14 and 19)

Rwanda's Media Law and Access to Information Law provide a formal legislative architecture broadly consistent with international standards on paper, and Rwanda has taken steps toward media self-regulation through bodies such as the Rwanda Media Commission. However, successive assessments, including the Rwanda Media Barometer 2024, produced with the participation of Rwandan media stakeholders²³, and civil society monitoring converge on a consistent finding: the enabling environment for independent, critical journalism remains narrow, characterized by financial precarity of independent outlets, limited institutional capacity for investigative reporting, and a persistent climate of self-censorship among journalists reporting on matters perceived as politically sensitive.

A central, long-pending reform is the revision of the 2011 Media Policy, which stakeholders across government, media, and civil society agree is overdue and which is intended to provide updated strategic direction on digital transformation, platform regulation, media sustainability, and professional standards. GLIHD urges the Committee to press for a firm timeline for the adoption of the revised Media Policy and for its periodic review thereafter, and for the meaningful participation of independent media associations, not only state-affiliated bodies, in its finalization.

Separately, Law No. 60/2018 on the Prevention and Punishment of Cybercrimes contains offences, including provisions addressing the publication of information deemed harmful to public order or the reputation of others online, that civil society and media associations consider are drafted in terms broad and imprecise enough to create legal uncertainty for journalists, bloggers, and ordinary social-media users, and to invite self-censorship. GLIHD is also concerned about the situation of citizen journalists and online commentators, and bloggers.

GLIHD recommends that the Committee ask the State party to: provide a specific timeline for the adoption and operationalization of the revised national Media Policy and describe the consultative process, including the participation of independent media associations; provide the text and any judicial interpretation of the cybercrime and public-order provisions cited above, together with prosecution statistics disaggregated by offence and outcome; and describe measures in place to protect journalists and human rights defenders.

Recommendations to the State party:

- Adopt the revised national Media Policy through a published consultative process that includes at least the principal independent media associations and self-regulatory bodies, with draft text circulated at least 60 days before finalization.
- Amend Law No. 60/2018 on Cybercrimes and related public-order provisions to define offences affecting online expression with the precision required by Article 19(3), narrowing terms such as “harmful to public order or reputation” to align with the necessity and proportionality test, informed by comparative guidance from UN and African human rights mechanisms.
- Establish a dedicated, publicly known focal point for journalists and human rights defenders to report surveillance, harassment, or reprisal, and commit to an annual transparency report on cases received and their resolution.

²³ Rwanda Media Barometer 2024, produced through a multi-stakeholder assessment process involving Rwandan media practitioners, regulators, and civil society.

- Commission an independent, methodologically credible survey of journalists' perceptions of safety and editorial independence, to be repeated every two years to track trends in self-censorship over time.

10. Freedom of Peaceful Assembly and Association (Articles 19, 21 and 22)

10.1 The 2024 NGO Law

Law No. 058/2024 of 20 June 2024, Governing Non-Governmental Organisations, entered into force in July 2024, repealing and consolidating prior legislation governing national and international NGOs.²⁴ The Government presented the reform as a measure to streamline registration and strengthen accountability, transparency, and good governance in the sector, and civil society acknowledges that a single, modernized regulatory framework can, in principle, serve legitimate objectives, including preventing misuse of the sector for money-laundering or terrorist financing, consistent with permissible limitations under Article 22(2). The draft law passed its first parliamentary reading in April 2024, shortly before the July 2024 general elections, a timing that some civil society representatives at the time noted with concern given the scale of the reform and the compressed legislative calendar.²⁵

Civil society's substantive concerns relate to specific powers the Law confers on the Rwanda Governance Board. RGB is empowered to register and monitor both national and international NGOs; to request explanations and additional information from organizations on a broad and not exhaustively defined range of matters; to approve, or in practice require notice and non-objection regarding, changes to an NGO's leadership and governing structures; to suspend an organization's registration certificate; and to revoke or terminate the legal personality or operating authorization of a national or international NGO respectively.²⁶ Civil society organizations report that these powers are exercised through administrative processes that in practice can determine an organization's continued existence, without a mandatory, time-bound, independent appeal to a court or tribunal preceding the taking effect of a suspension or revocation decision, and that the statutory grounds for such measures, including references to "public order," "national interests," or "unauthorized activities", are not always defined with the precision necessary to allow organizations to foresee, with reasonable certainty, what conduct might trigger sanction.

Since the Law's entry into force, civil society organizations have reported: delays in the issuance of implementing guidelines necessary to operationalize registration and compliance procedures, which have created a prolonged period of legal uncertainty during the transitional compliance process; inconsistent interpretation of specific statutory provisions by different RGB offices or officials, particularly regarding permissible sources and use of foreign funding, reporting formats, and governance-change notification requirements; and a general increase in the administrative burden associated with compliance, which smaller, community-based, and rights-focused organizations, as distinct from larger service-delivery NGOs, report finding disproportionately difficult to absorb. These implementation concerns do not, in civil society's

²⁴ Law No. 058/2024 of 20/06/2024 Governing Non-Governmental Organisations, Official Gazette No. Special of 19/07/2024.

²⁵ Voice of America, "Rwanda legislature considers strict rules on NGOs," April 2024; International Center for Not-for-Profit Law (ICNL), Civic Freedom Monitor, Rwanda country update, 2024.

²⁶ DefendDefenders (East and Horn of Africa Human Rights Defenders Project) and Observatoire des Droits de l'Homme au Rwanda, joint submission to the Universal Periodic Review of Rwanda, 51st session, 2025; CIVICUS and CEMIRIDE, joint UPR submission on Rwanda, 51st session, 2025.

assessment, amount to a rejection of the legitimacy of State oversight of the sector as such; rather, they underscore the need for legal certainty, proportionality, procedural fairness, and genuine, ongoing consultation between regulators and civil society in both the drafting of implementing guidelines and their application.

GLIHD notes that Rwanda's most recent Universal Periodic Review generated multiple recommendations, clustering around UPR reference numbers 134.102, 134.105, 134.108, 134.109, and 134.112 through 134.119, encouraging the State party to continue strengthening civic space, to support an enabling environment for civil society organizations and human rights defenders, to safeguard freedom of expression and peaceful assembly, and to review the 2024 NGO Law and associated legal and policy frameworks to ensure full consistency with international human rights standards, including by removing unduly stringent registration conditions and addressing operational barriers identified by civil society.²⁷ A related cluster of recommendations, numbered approximately 134.122 through 134.131, called for revision of media laws and policy to guarantee freedom of expression, press freedom, access to information, and the rights of human rights defenders, digital media actors, and citizen journalists.²⁸ Civil society urges the Committee to reinforce these recommendations directly under Article 22 of the Covenant, and specifically to ask the State party to bring the 2024 NGO Law into compliance with the Covenant, including by introducing a clear possibility of judicial appeal against a refusal to register an NGO or against suspension or revocation decisions, with suspensive effect pending appeal where feasible, and by safeguarding organizations' operational independence, including their ability to manage their own assets and to decide upon their own leadership without prior State approval.

Recommendations to the State party:

- Amend Law No. 058/2024 to insert an explicit right of judicial appeal, with suspensive effect pending final determination, against refusal to register an NGO and against any decision to suspend or revoke legal personality, with a statutory maximum timeline for the court to rule.
- Publish all outstanding implement guidelines for registration and compliance procedures, together with a defined, published transition timeline for organizations still completing compliance.
- Establish a standing, quarterly RGB–civil society dialogue platform, with rotating representation from national, community-based, and rights-focused organizations, to resolve inconsistent interpretation of registration, funding, and governance-notification requirements.
- Narrow the statutory grounds for suspension or revocation (currently including broad terms such as “public order” or “national interests”) to precisely defined, exhaustively listed criteria, consistent with the permissible-limitations test in Article 22(2).
- Publish annual statistics on NGO registration applications, approvals, suspensions, and revocations, disaggregated by organization type, size, and thematic focus.

²⁷ Universal Periodic Review of Rwanda, 3rd/4th cycle recommendations on civic space, freedom of association, and the NGO regulatory framework, as compiled in the UPR outcome documentation.

²⁸ Universal Periodic Review of Rwanda, recommendations on media law and policy reform, freedom of expression, and the rights of human rights defenders and digital/citizen journalists, as compiled in the UPR outcome documentation.

10.2 Freedom of peaceful assembly

Civil society organizations report that public demonstrations and assemblies on matters of political or governance sensitivity remain rare in practice, reflecting both a formal permit-based system for public gatherings and a broader climate in which organizers describe informal discouragement or the practical difficulty of obtaining authorization for gatherings perceived as critical of government policy. By contrast, assemblies organized by or aligned with government-affiliated structures, including community service (umuganda) mobilization and government-sponsored commemorations, proceed routinely and without comparable friction, a disparity civil society considers relevant to the Committee's assessment of whether the permit system is applied in a content-neutral manner as required by Article 21's permissible-limitations test, which confines restrictions to those necessary in a democratic society in the interests of national security, public safety, public order, public health or morals, or the rights and freedoms of others.

GLIHD recommends that the Committee ask the State party to clarify the legal criteria governing approval or denial of applications to hold public assemblies, the average processing time for such applications, the number of applications denied in the reporting period and the stated grounds for denial, and the avenues of appeal available to organizers. Civil society further recommends that the Committee ask whether the State party collects and could make available comparative data on the approval rate for assemblies organized by government-affiliated bodies as against those organized by independent civil society or opposition-aligned groups, as a means of assessing content-neutrality in practice.

Recommendation: Publish a single, plain-language checklist of the criteria for approving public assembly applications, commit to a maximum 7-working-day response time, and establish an appeal route to a body independent of the authority that issued the denial; report annually on approval and denial rates disaggregated by organizing entity type.

10.3 Freedom of association in the labour sector

GLIHD recognizes as a positive development that trade unions in Rwanda operate under a functioning legal framework and engage actively in social dialogue, including ongoing discussions concerning the establishment of a national minimum wage. We encourage the Committee to note this progress while continuing to monitor whether trade union associational rights extend in practice to sectors, including the informal economy, where the large majority of Rwandan workers are engaged.

11. Summary of Recommendations to the Human Rights Committee

GLIHD respectfully requests that the Committee consider incorporating the following recommendations, organized by theme, into its Concluding Observations:

Institutional framework (Article 2)

1. Request a concrete timeline for establishing NCHR regional offices and increasing its budgetary and operational independence.
2. Request statistics on NCHR investigations into complaints against public officials, disaggregated by outcome, and information on the transparency of its investigative methodology.
3. Encourage Rwanda to accede to the Optional Protocol to the ICCPR.

Liberty, detention, and fair trial (Articles 7, 9, 10, 14, 24)

4. Request disaggregated data on compliance with the 48-hour pre-charge detention limit and consequences for non-compliance.
5. Request capitalization, disbursement, and geographic-coverage data for the Legal Aid Fund and published eligibility criteria for funded legal assistance.
6. Request facility-level prison-occupancy data against design capacity and information on the expanded use of alternatives to pre-trial detention.
7. Call on the State party to end the administrative detention of children and adults on grounds of “deviant behaviour,” vagrancy, or informal street activity absent individualized judicial authorization, and to close or fundamentally reform transit/rehabilitation centres in line with the African Court’s advisory opinion on vagrancy laws.

Freedom of religion (Articles 2, 18, 23, 24, 26, 27)

8. Request updated, disaggregated data on places of worship closed and reopened since 2023, and a description of the appeal mechanism available to affected congregations.
9. Request a proportionality and necessity assessment of the pace and scale of closures under Article 18(3), and of the clergy-qualification requirement as applied to smaller and minority traditions.

Freedom of expression and media (Articles 9, 14, 19)

10. Request a firm timeline for adoption of the revised national Media Policy, with meaningful participation of independent media associations.
11. Request the text, judicial interpretation, and prosecution statistics for cybercrime and public-order provisions affecting online expression, and measures to prevent their over-broad application to legitimate journalism and commentary.

Freedom of association and assembly (Articles 19, 21, 22)

12. Call on the State party to review Law No. 058/2024 to introduce a clear, time-bound, and suspensive right of judicial appeal against refusal to register an NGO and against suspension or revocation of legal personality.
13. Call on the State party to narrow and clarify the statutory grounds for RGB intervention in NGO governance and to safeguard organizational independence, including control over assets and leadership selection.
14. Request data on the number and outcome of NGO registration applications, suspensions, and revocations since the Law’s entry into force, disaggregated by organization type and size.