



Submission by ARTICLE 19 to the Foreign, Commonwealth and  
Development Office on the situation of freedom expression and access to  
information online in the Islamic Republic of Iran

**27 September 2023**

In this briefing, ARTICLE 19 provides an overview of recommendations and areas we believe the Foreign, Commonwealth and Development Office (FCDO) of His Majesty's (HM) government should pursue in aid of human rights in the Islamic Republic of Iran. Since the start of the nationwide Mahsa Jhina Amini protests in mid-September 2022 we have appreciated His Majesty's government placing the issue of human rights in Iran on its agenda. We welcomed the time and enthusiasm during the Monday 25 September 2023 meeting with the Foreign Secretary and Lord Ahmad, facilitated by Amnesty UK. We urge the offices of both Lord Ahmad and the Foreign Secretary to facilitate these meetings on a quarterly basis and follow through on our dialogue and recommendations.

ARTICLE 19 has been monitoring [the abuses against freedom of expression both online and offline](#) in Iran. Particularly alarming has been the Iranian authorities' imposition of internet shutdowns and disruptions during the protests. They have used these and other measures to prevent people from exercising their right to freedom of expression and assembly; to conceal the scale and severity of their deadly crackdown on protests; and to in turn facilitate the commission of possible crimes against humanity.

The following briefing looks at three areas which we would like the UK to focus its efforts on, namely: internet shutdowns and disruptions; ways to stop the transnational flows of censorship and surveillance equipment to the Islamic Republic of Iran; and lastly, work with social media companies to ensure their platforms help empower users to access their rights to freedom of expression in a context where they face increasing harms from the state.

What follows are detailed requests for focused work under each area:

## 1. Internet shutdowns and disruptions

1.1: Exercising UK leadership through the Freedom Online Coalition and Task Force on Internet Shutdowns (TFIS): We urge the FCDO to continue placing the issue of shutdowns on the TFIS' agenda, with regular announcements and events to ensure this remains in the headlines. Reference here should be made to the Joint statement from 2022 on Iran, which was most welcome:

[https://freedomonlinecoalition.com/wp-content/uploads/2022/10/FOC-Joint-Statement-on-Internet-Shutdowns-in-Iran\\_October-2022.pdf](https://freedomonlinecoalition.com/wp-content/uploads/2022/10/FOC-Joint-Statement-on-Internet-Shutdowns-in-Iran_October-2022.pdf).

1.2: Exercising UK leadership through the International Telecommunication Union (ITU), we urge the UK to push the ITU to issue a warning on internet shutdowns and disruptions, and clarify the abuse of the ITU constitution's articles 34 and 35 by human rights-abusing states. See <https://www.article19.org/wp-content/uploads/2020/09/TTN-report-2020.pdf>.

1.3: We also urge you to look at the precedent for warnings issued by the ITU previously, such as this: <https://www.itu.int/hub/2022/08/warning-harmful-interference-rnss/>.

1.4: Consider investment in projects and platforms to help facilitate access to the internet (VPNs, satellite internet, etc). Encourage cloud providers such as Google Cloud Platforms, Amazon Web Services (AWS), and Cloudflare to provide internet freedom access for VPN/proxy providers for Iranians to use their servers at free or discounted prices, and create pressure for them to do so.

1.5: Consider investment and research in how to support underserved and vulnerable populations such as internet users in Sistan and Baluchistan. Internet shutdowns and disruptions have continued every Friday in this region, which has faced the highest numbers of deaths caused by authorities' repression. Specifically, invest in satellite internet projects for Sistan and Baluchistan, and work with partner countries such as Pakistan on improving internet infrastructure in the region.

## 2. Prevent censorship and surveillance equipment from entering the Islamic Republic of Iran

2.1: ARTICLE 19 reasserts that a moratorium is needed on the development of facial recognition and biometric technologies given their fundamental inconsistencies with international human rights standards. The most pressing and troubling examples have been its use to police women and protesters in the Islamic Republic of Iran to deny them basic human rights.

See our briefing here:

<https://www.article19.org/resources/iran-tech-enabled-hijab-and-chastity-law-will-further-punish-women/>

2.2: Companies involved in the development of this technology and sales to the Islamic Republic must be held accountable by states and international bodies. The UK must work internationally to ensure companies, such as China's Tiandy and Huawei, or Germany's Bosch, are not selling this technology to Iran.

2.3: Work with partners to penalise and sanction companies that sell dual use technologies to the Islamic Republic of Iran.

2.4: The United Kingdom must uphold its commitments to ensuring secure and encrypted technologies are safeguarded. The development of 'backdoors' will pose a significant danger to users in vulnerable contexts like in Iran, where people rely on secure and encrypted messengers for their activism.

### 3. Ensuring human rights remains a priority with social media companies

3.1: We urge the government to work with social media companies to ensure they are enforcing policies that abide by international standards, such as the six-part test of the [Rabat Plan of Action](#), regarding the threshold for content removals or allowances. In particular, we ask companies not to over-enforce and remove content related to protests and the expression of activists in Iran; and ask for enforcement of takedowns related to human rights abuses, hate speech and disinformation promoted by institutions and supporters of the Islamic Republic of Iran. See ARTICLE 19's previous work in this regard here:

<https://www.article19.org/resources/iran-meta-persian-language-content-moderation-instagram/>

3.2: We ask the UK government to work with Telegram, a registered entity within the United Arab Emirates, to ensure it removes harmful and criminal content posted by institutions of the Islamic Republic of Iran, such as the Ministry of Intelligence and the Revolutionary Guards (IRGC).

3.3: We ask the UK government to work with X, or the platform formerly known as Twitter, to ensure it abides by standards of human rights and allocates appropriate resources to work with civil society.

For further enquiries about this work please contact ARTICLE 19's Senior Programme Officer leading this work, Mahsa Alimardani: [mahsa@article19.org](mailto:mahsa@article19.org).