Sudan

Country Focus Report

2025

EU SEE

SUPPORTING
AN ENABLING ENVIRONMENT
FOR CIVIL SOCIETY

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A) An Introduction to the Enabling Environment

What we understand by an Enabling Environment is the combination of laws, rules and social attitudes that support and promote the work of civil society. Within such an environment, civil society can engage in political and public life without fear of reprisals, openly express its views, and actively participate in shaping its context. This includes a supportive legal and regulatory framework for civil society, ensuring access to information and resources that are sustainable and flexible to pursue their goals unhindered, in safe physical and digital spaces. In an enabling environment, the state demonstrates openness and responsiveness in governance, promoting transparency, accountability, and inclusive decision-making. Positive values, norms, attitudes, and practices towards civil society from state and non-state actors further underscore the supportive environment.

To capture the state of the Enabling Environment, we use the following six principles:

SIX ENABLING PRINCIPLES

- Respect and Protection of Fundamental Freedoms
- Supportive Legal and Regulatory Framework
- Accessible and Sustainable Resources
- Open and Responsive State
- Supportive Public Culture and Discourses on Civil Society
- Access to a Secure Digital Environment

In this Country Focus Report, each enabling principle is assessed with a quantitative score and complemented by an analysis and recommendations written by our Network Members. Rather than offering a singular index to rank countries, the report aims to measure the enabling environment for civil society across the six principles, discerning dimensions of strength and those requiring attention.

The findings presented in this report are grounded in the insights and diverse perspectives of civil society actors who came together in a dedicated panel with representatives from civil society to discuss and evaluate the state of the Enabling Environment. Their collective input enriches the report with a grounded, participatory assessment. This primary input is further supported by secondary sources of information, which provide additional context and strengthen the analysis.

Research period covered: January 2025 to September 2025

Brief Overview of the Country Context

This report covers enabling-environment developments from January to September 2025, with occasional references to key events that occurred prior to January 2025 where relevant. Throughout 2025, Sudan remained engulfed in a nationwide armed conflict involving the Sudanese Armed Forces (SAF), the Rapid Support Forces (RSF), and aligned militias. The war continued to erode the country's political and social foundations, severely undermining fundamental freedoms and restricting the ability of civil society to operate.

In February 2025, Sudan's SAF-aligned government unilaterally amended the 2019 Constitutional Document, extending the transitional period by 39 months, removing references to both the SAF and RSF, increasing military representation and powers within the Sovereign Council, expanding its authority over key appointments and policy decisions, and abolishing the committee investigating the SAF-perpetrated 2019 massacre, thereby entrenching SAF control over the transition. In a parallel move on 23 February 2025, the RSF and allied groups signed a Charter in Nairobi to establish a parallel government, a move experts warned would deepen Sudan's de facto partition and intensify an already devastating conflict marked by atrocities. This was followed by the signing of a transitional constitution on 3 March outlining a secular, decentralised governance system, and ultimately by the formal announcement on 26 July of a parallel government headed by RSF commander Mohamed Hamdan Dagalo through a newly formed Presidential Council. By late 2025, analysts described a near-total collapse of the enabling environment for civic actors, marked by the fragmentation of state authority and the spread of "governance through violence" across large parts of the country. As a result, Sudan's civic space was rated "closed" in the 2025 CIVICUC Monitor.

Civil society organisations faced a de facto territorial division: SAF-held areas in the east and north, and RSF-controlled zones across central and western regions. Operating in any part of the country required navigating complex and often arbitrary "triple approval" processes involving bodies such as the Humanitarian Aid Commission, the General Intelligence Service, SARHO and Military Intelligence. These procedures routinely resulted in delays, denials, or intrusive monitoring, creating an environment of acute insecurity for national civil society actors. Conditions further deteriorated following the United States' January 2025 suspension of key funding streams and the collapse of banking systems, which left many organisations unable to pay staff or maintain even minimal operations.

Despite these pressures, local mutual-aid structures—particularly the Emergency Response Rooms—remained the primary source of humanitarian assistance for millions of Sudanese. However, as the conflict deepened, both warring parties increasingly portrayed civic actors as foreign agents or political adversaries, contributing to a sharp rise in arbitrary detention, enforced disappearance, and targeted killings. Monitoring by OHCHR and independent observers confirmed the deliberate use of bureaucratic obstacles, movement restrictions, and internet shutdowns to constrict independent civic space throughout 2025.

Although international frameworks such as the 2025 Sudan Humanitarian Needs and Response Plan sought to sustain support, the reality on the ground remained one of extreme repression and operational fragility. The continued survival of civil society depended largely on informal local negotiations, community solidarity networks, and the contributions of a dispersed but resilient Sudanese expert and activist diaspora.
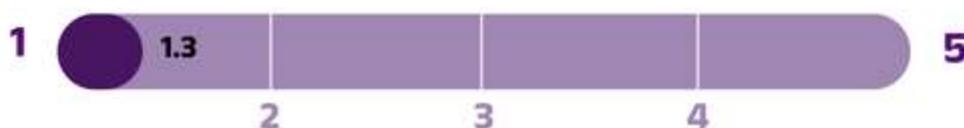
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B) Assessment of the Enabling Environment

PRINCIPLE SCORE

1. Respect and Protection of Fundamental Freedoms

Score: [1]

Although Sudan's 2019 Constitutional Charter nominally protected association, assembly and expression, emergency rule, fragmented territorial control and expansive security powers rendered these guarantees ineffective. Civil society organisations faced restrictive legacy laws and parallel control systems imposed by both SAF and RSF—most notably SARHO in RSF-held areas—resulting in heavy bureaucratic interference and shrinking operational space. Peaceful assembly was effectively impossible in many regions as emergency statutes, militarised urban environments, and widespread violence made public gatherings unsafe or subject to immediate repression. Freedom of expression suffered the most acute decline, with authorities and armed groups using criminal, media, and cybercrime laws to silence critics, detain journalists and dismantle independent media, while network shutdowns further entrenched information control. Collectively, these dynamics reflect a significant and continuing contraction of civic freedoms nationwide.

1.1 | Freedom of Association

Sudan's 2019 Draft Constitutional Charter remains, in law, the supreme normative framework, with its Rights and Freedoms Chapter guaranteeing core civil liberties and placing all authorities under the rule of law; yet, in practice during 2025, those guarantees were largely inoperative because emergency rule, fragmented territorial control and the absence of functioning judicial oversight allowed security and military actors to trump rights protections. The Charter repealed the 2005 constitution while preserving pre-existing laws unless

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amended, a design choice that left a dense thicket of older security and association controls available to authorities throughout 2025. These dynamics were documented throughout 2025 by UN human rights reporting and independent analysis, which converged on the assessment that the civic environment had further collapsed under the weight of the war.

The core statute governing civil society organisations, the Voluntary and Humanitarian Work (Organisation) Act, 2006, entrenches administrative controls over association. The Act requires at least 30 founders for domestic NGOs, empowers the Registrar to refuse or strike off registration, and conditions foreign funding on prior governmental approval, thereby creating multiple veto points over organisational life cycles and resource flows (sections 7, 9, 13–14, 18–22). Human rights organisations have long argued that these provisions are incompatible with constitutional and regional standards and are routinely weaponised to constrain independent association; that reading remained accurate in 2025 as security bodies and de facto authorities applied identical tools across a fractured territory.

A distinct and increasingly decisive 2025 development was the rise of SARHO—the Sudanese Agency for Relief and Humanitarian Operations—in RSF-controlled areas. OCHA's access snapshots and public statements by the UN Humanitarian Coordinator recorded a pattern of co-operation agreements, travel authorisations, convoy escorts, and material interference imposed by SARHO that delayed or prevented delivery, restricted operations to RSF-held localities, and chilled the work of national NGOs. The April 2025 snapshot describe these impediments and the temporary, partial easing of some restrictions, while contemporaneous public appeals highlighted "persistent restrictions" and called on SARHO to comply with the Jeddah Declaration's humanitarian access commitments. In parallel, HAC and state authorities in SAF-held areas continued to impose visa denials, travel permit delays and financial exactions that likewise obstructed CSO operations, demonstrating that both sides of the conflict relied on bureaucratic tools to shrink civic space.

The AU Peace and Security Council (PSC), in its 14 February 2025 communiqué, registered deep concern over the conflict's humanitarian consequences and civic-space implications, aligning with UN human rights reporting that documented enforced disappearances, killings of defenders, and systematic intimidation of organisers across battleground states. At the same time, macro-financing shocks intensified operational fragility: the US foreign-assistance pause announced in late January 2025 and subsequent cuts undermined flexible funding streams on which local associations depended, with UN agencies, ACAPS and global media warning of cascading programme suspensions and staff lay-offs in Sudan and beyond.

Overall, association remained nominally protected but practically disabled in 2025: legacy laws and security frameworks provided legal cover for prior authorisation and intrusive oversight, newer RSF-area mechanisms (SARHO) instituted parallel conditionality regimes, and warring parties instrumentalised access and surveillance to punish perceived critics. The cumulative evidence—Constitutional Charter on paper, association statute in force, SARHO and HAC practices in the field, and UN/AU findings—supports a clear trend of continued decline rather than improvement.

1.2 | Freedom of Peaceful Assembly

The constitutional framework purports to protect peaceful assembly, but its application was systematically displaced in 2025 by emergency and security statutes and by the militarisation of public space. The Emergency and Protection of Public Safety Act, 1997 empowers the executive to declare emergencies and to prohibit or restrict movement and activities, to search and seize, and to arrest for emergency offences (notably Article 5), while the National Security

Act, 2010 authorises security services to detain, search and seize with limited judicial oversight and functional immunity (e.g., section 50), conditions that together convert assembly into a permission-dependent activity that can be dissolved on public-order grounds at short notice. Civil society monitors and legal commentaries have shown that these texts were repeatedly used to ban, disperse and prosecute gatherings, a practice that resumed and intensified with the return to wartime emergency rule.

The operational context made safe gatherings effectively impossible in many locations in 2025. In Port Sudan, the de facto administrative hub under SAF, a six-day RSF drone campaign (4–9 May 2025) struck the air base, airport, fuel depots, and city centre, triggering blackouts and expansive security deployments that erased any practical space for assembly; the UN temporarily suspended humanitarian flights, and risk to civilians escalated. In Khartoum and Khartoum North, as SAF retook ground in January–March 2025, OHCHR recorded summary executions and arbitrary detentions of civilians in newly seized areas—conditions incompatible with freedom of peaceful assembly and consistent with the use of emergency and security frameworks to control movement and suppress public gatherings. In North Darfur, the siege and eventual fall of El-Fasher deepened a humanitarian crisis marked by shelling and starvation; UN experts and protection agencies warned of ethnically targeted attacks and forced displacement, circumstances that extinguish any practical capacity for civic assembly.

The net effect in 2025 was that assembly shifted from a right to a hazard, conditioned by local military control, emergency decrees and the practical realities of urban warfare. Independent tallies of assemblies held, denied, or dispersed could not be generated due to media closures and blackouts, but triangulated evidence from UN human rights mechanisms, legal monitors and network-freedom assessments supports the conclusion that peaceful assembly was largely curtailed or deterred by credible fear of reprisal across both SAF- and RSF-controlled zones.

1.3 | Freedom of Expression

On paper, Article 57 of the 2019 Constitutional Charter guarantees freedom of expression and access to information; in practice throughout 2025, a stacked legal arsenal and conflict-driven controls enabled authorities and armed groups to criminalise speech, suspend media, and detain journalists with impunity. The toolkit includes Criminal Code 1991 Article 66 on "false news"; the Press and Publications Act 2009, which vests the National Council for Press and Publications (NCPP) with licensing and suspension powers and, in Article 25, it safeguards journalists' right to protect their sources; the Cybercrimes and Information Technology Crimes Act 2018, tightened in 2020 to increase penalties for online "fake news"; and the National Security Act 2010, providing arrest, search and seizure authorities backed by immunities. In addition, chapter 26 of the 2003 Penal Code makes defamation a criminal offence punished with prison terms not exceeding two years, as well as fines.

2025 practice bore out the chilling effect of these provisions. In September 2025, the Ministry of Culture, Information and Tourism suspended Al Arabiya/Al Hadath bureau chief Lina Yaqoub and revoked her press accreditation on "national security" grounds, a decision denounced by the Sudanese Journalists Syndicate as a grave blow to press freedom and the public's right to know; the episode exemplified the use of vague security rationales to sanction critical reporting. In Darfur, the RSF detained journalist El-Rashid Mohamed Haroun in late July 2025, subsequently transferring him to Dagris/Djeris Prison (Nyala) without charge and denying family access, prompting the Committee to Protect Journalists (CPJ) and independent

outlets to call for his release as part of a wider pattern of journalist detentions in RSF-held areas.

Since the war erupted on 15 April 2023, both the SAF and the RSF have systematically targeted journalists and activists, treating criticism as grounds for persecution, including arbitrary arrest, torture, and enforced disappearance. The collapse of independent newspapers and radio stations has produced a de-facto media blackout, while warring parties have created partisan media outlets that spread propaganda, false information, and hate speech amid the destruction of up to 90% of Sudan's media infrastructure. Remaining journalists operate in an extremely unsafe environment marked by killings, beatings, threats, and detention by both factions, with authorities also withholding or refusing to renew short-term work permits to silence critical reporting. In regions controlled by the RSF, including Darfur and much of Kordofan, most journalists have been targeted and thus fled, leaving a few trapped in besieged areas such as El Fasher, where they face shelling and imminent danger due to RSF military operations.

International indices mirrored these realities. Reporters Without Borders ranked Sudan 156th of 180 in the 2025 World Press Freedom Index, citing targeted attacks by both warring parties, regulatory capture and the spread of disinformation by state and paramilitary media. UN human rights reporting during February 2025 documented killings of journalists, arbitrary detentions, and intimidation campaigns, indicating that criminalisation of expression was embedded in broader patterns of abuse against civilians and civic actors.

The overall assessment is that Sudan's 2025 expression climate was one of extreme repression and systemic precarity. Legal frameworks—criminal, media and cyber—were deployed alongside administrative suspension powers and emergency/security statutes, while network shutdowns and direct violence against media workers dismantled independent expression both offline and online. The cumulative weight of domestic law, cases such as the Yaqoub suspension and Haroun detention, and international monitoring data support a clear downward trajectory across the year, with little evidence of countervailing judicial or policy safeguards.

PRINCIPLE SCORE

2. Supportive Legal and Regulatory Framework

Score:

1	1.3			5
	2	3	4	
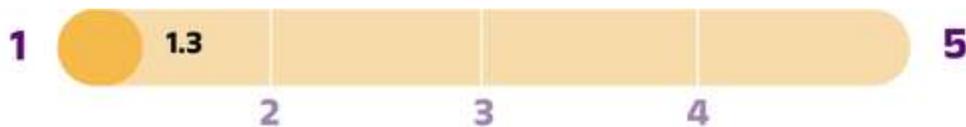
Across 2025, the regulatory and operational conditions for CSOs in Sudan deteriorated markedly: registration remained governed by the highly discretionary Voluntary and Humanitarian Work Act of 2006, whose provisions empower the Registrar and Humanitarian Aid Commission to refuse, delay, or cancel registration, while new HAC directives in Khartoum forced grassroots relief initiatives—especially Emergency Response Rooms—to register, pay fees, and submit personnel lists under threat of criminalisation, and RSF-controlled areas introduced their own parallel system through SARHO, requiring cooperation agreements and imposing movement controls. At the same time, the day-to-day operational environment narrowed due to escalating bureaucratic obstacles—most visibly visa backlogs that surged to 299 pending applications by April and NGO suspensions by state authorities—and by direct interference from both HAC and SARHO, which restricted travel, denied permits, and dictated operational terms. In addition, lethal attacks such as the April killing of 11 Relief International staff in Zamzam underscored the collapse of meaningful protection for humanitarian actors.

2.1 | Registration

Sudan's core CSO law—the Voluntary and Humanitarian Work (Organisation) Act, 2006 (hereafter referred to as the 2006 Act)—remains the principal gateway for legal personality, and its architecture supports state discretion at every stage of the registration life-cycle. *Chapter II* on registration empowers the Registrar to refuse or cancel registration and conditions recognition on compliance with implementing rules; the Act also creates the Voluntary and Humanitarian Aid Commission (HAC) and vests it with supervisory and registration functions (*ss.* 18–22), while appeal against refusal/cancellation is routed through administrative channels (*s.* 14). These clauses—together with the Act's "country agreement" device for foreign NGOs and prior approvals—create multiple veto points, particularly salient in conflict-affected or opposition-held areas.

In practice, 2025 saw registration tighten rather than loosen. In Khartoum State, SAF-aligned authorities ordered all relief initiatives—including Emergency Response Rooms (ERRs) running communal kitchens—to register with HAC, with officials confirming fees and personnel lists as pre-conditions; local volunteers described the move as a crackdown that risked arrests of unregistered aid workers. The directive's terms were publicised in late May 2025, with named HAC officials confirming the requirement and approximate fee. In parallel, the RSF consolidated a rival administrative order in areas it controls: after signing a Founding Charter in February–March 2025, the RSF-aligned Sudan Founding Alliance endorsed a "transitional constitution" to structure a parallel government, with attendant law-and-policy effects on civil administration (including NGO authorisations) in Darfur/Kordofan.

Clarity and affordability remain problematic. The 2006 Act's implementing practice is opaque (for instance, demanding *ad hoc* documentation, security vetting and country agreements), and 2025 added extra-statutory filters: visas and travel permits for staff became a de facto registration throttle, with OCHA recording that in February 2025 only 66 of 113 INGO visa applications were approved and a large share left pending beyond four weeks; the backlog further surged to 299 pending cases in April, hampering scale-up and staff rotation. Appeals exist on paper (*s.* 14), but there is no evidence of a transparent or timely remedy in 2025: administrative processing delays and overlapping security approvals largely neutralised formal avenues.

Marginalised groups were disproportionately affected. ERRs and neighbourhood mutual-aid collectives—typically unregistered, volunteer-led—faced HAC registration demands they could neither afford nor safely comply with amid surveillance and reprisals, while in RSF-held areas the SARHO system conditioned movement on co-operation agreements and imposed armed escorts, effectively screening which local actors could operate. Human-rights monitors and access indices converged on deterioration, not improvement: ACAPS assessed extreme access constraints into early 2025 and documented administrative blockages alongside active hostilities.

Overall, the legal framework nominally allows anyone to found an organisation, but the 2006 Act's broad registrar powers and layered approvals, compounded in 2025 by HAC orders in SAF areas and SARHO controls in RSF areas, made registration unclear, costly and contingent. The existence of an appeal clause did not translate into an effective remedy.

2.2 | Operational Environment

By design, the 2006 Act subjects CSO governance and field operations to continuous administrative oversight—through licensing, re-registration, reporting, and the Commission/Registrar's powers to review projects and funding—limiting meaningful autonomy without prior state engagement. The Act also ties the entry and operations of foreign NGOs to a "country agreement" regime and empowers authorities to suspend or cancel operations. Funding is governed both by the 2006 Act's prior-approval culture and by Anti-Money Laundering and Combatting of Terrorism Financing (AML/CFT) controls: Sudan's 2014 AML/CFT Law criminalises money-laundering and terrorism financing and mandates robust KYC/monitoring by banks and institutions, practices that—absent risk-based proportionality—translate into de-risking and delays for CSO transfers.

Operationally, 2025 was defined by dual administrative gatekeepers. In RSF-held zones, SARHO increasingly required co-operation agreements, travel authorisations and even armed convoy escorts, with OCHA's February 2025 Access Snapshot explicitly recording SARHO restrictions on organisations that refused to sign, and interference that curtailed access outside RSF areas (though a temporary easing was reported until April). In SAF-held areas, state bodies (including HAC and line ministries) imposed visa denials, permit delays, and

financial exactions (e.g., recruitment fees, slow technical agreement signatures), directly constraining programme delivery in Gedaref/Kassala. By April 2025, OCHA documented a surge to 299 pending visas and the suspension of 30 national and three international NGOs by South Kordofan authorities—clear instances of administrative levers being used to throttle operations.

Access risks intersected with lethal violence. In April 2025, Relief International reported 11 staff killed during the RSF assault on Zamzam IDP camp, while the same episode appears in the OCHA April Snapshot, which also noted broader attacks on compounds in El-Fasher. The UN Humanitarian Coordinator publicly appealed on 10 February 2025 for SARHO to lift persistent restrictions and comply with Jeddah Declaration access obligations, underscoring how bureaucratic interference, not only fighting, was disabling operations.

CSO testimonies and sector indices echoed these realities. ACAPS' thematic analysis through October 2024–March 2025 tracked "extreme" access constraints driven by both conflict and administrative measures; the pattern deepened over Q1–Q2 2025. Meanwhile, in May 2025 Khartoum State moved to force-register grassroots ERRs with HAC, with an official confirming fees and full personnel rosters—an action widely read by local volunteers as a tool of monitoring and co-optation.

Therefore, the overall assessment is that the law does not allow CSOs to freely set objectives and activities without approval: pre-approvals, travel/visa controls, funding vetting, and reporting burdens combined to raise transaction costs and strategic risk. 2025 incidents— SARHO's conditionality, state-level suspensions, visa backlogs, and forced registration orders—shaped an operational environment that moved from difficult to prohibitively restrictive. Trend: continued decline.

2.3 | Protection from Interference

On paper, the 2006 Act defines grounds and procedures for cancellation or strike-off, with a formal right of appeal (*s.* 14). In substance, the law's open-textured clauses—combined with the Commission's powers—leave CSOs thinly protected against politically-motivated dissolution or disabling conditions, particularly when emergency and security statutes are layered on top. The 1997 Emergency and Protection of Public Safety Act equips executives with wide emergency powers—bans on movement and activities, seizures, arrests—that readily spill into civic-space control (*Art.* 5). The 2010 National Security Act compounds this with detention, search and seizure powers and functional immunities that weaken judicial redress and enable interference under security pretexts, conditions long criticised by rights groups.

The 2025 fact pattern shows how these frameworks translated into practice. In RSF areas, SARHO functioned as a parallel regulator and operational gatekeeper, interfering in targeting and movement and restricting assistance to RSF-held localities; OCHA documented the requirement for co-operation agreements, escorts and the chilling effect on independent national actors. In SAF-controlled zones, authorities turned to suspensions and administrative coercion: South Kordofan's decision to suspend 33 NGOs and Khartoum's order that ERRs register with HAC (with fees and lists of volunteers) exemplify instruments of control that fall short of formal dissolution yet disable operations. The net effect was to erode any effective protection from arbitrary interference; appeals existed, but did not operate as a fast, independent check in 2025.

The protection deficit was inseparable from physical risk. The April 2025 killings of Relief International staff in Zamzam, recorded by the organisation and by OCHA, illustrate how interference and violence converged—first through administrative restrictions that narrowed

safe corridors, then through direct attacks that destroyed the operational footprint. The UN Resident/Humanitarian Coordinator's public appeal on 10 February 2025 to end SARHO's interference and restore safe access further underscored that state/para-state bodies were instrumentalising oversight to obstruct aid. Separately, the SAF-aligned authorities' February 2025 amendment of the 2019 Constitutional Document (as tracked above) entrenched military control of public authority—hardly a backdrop conducive to independent CSO remedies.

The overall assessment is that the legal order offers formal protections against dissolution and interference, but their practical value was largely negated in 2025 by emergency/security powers and by de facto regulators (HAC/SARHO). Inspections and interventions were used not as neutral compliance tools but as levers of control and surveillance, with no reliable judicial brake.

PRINCIPLE SCORE

3. Accessible and Sustainable Resources

Score:

1		2.0			5
	2		3	4	
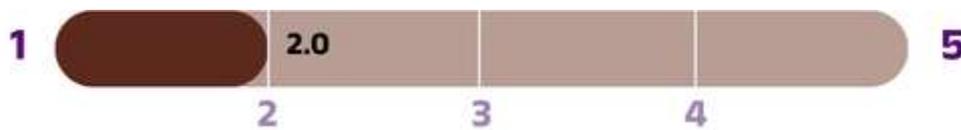
Across 2025, Sudanese civil society faced a steadily deteriorating resource environment defined by shrinking accessibility, weakening effectiveness, and declining sustainability of funding. Accessibility was constrained by shrinking of international support, the collapse of the banking system, extreme inflation driven by multiple exchange rates, black-market currency dependence linked to external transfers, and growing administrative interference from authorities, all of which limited organisations' ability to obtain or deploy funds in line with their programme needs. Effectiveness was similarly undermined: donor conditionalities tightened, government bodies in both SAF- and RSF-controlled areas redirected or constrained humanitarian activities, and operational conditions—marked by insecurity, movement restrictions and communications disruptions—reduced the impact of the resources that did reach organisations. Sustainability suffered from heavy reliance on a small set of unpredictable funding sources, widening gaps between funding cycles, and the absence of dedicated support for long-term institutional resilience, leaving CSO operations increasingly short-term, risk-laden, and dependent on fragile community-based coping mechanisms.

3.1 | Accessibility of Resources

Funding is available for local and national organisations, particularly those involved in humanitarian efforts in Sudan across various controlling groups, including the Armed Forces, Rapid Support Forces, Sudan Liberation Army Movement, Abdul Wahid, and the Sudan People's Liberation Movement, Al-Hilu. Support is provided through the Sudan Humanitarian Fund (SHF), Country-Based Systems (CCS), and international humanitarian aid institutions such as the European Union, and foundations such as the Clinton Foundation and global corporations with social responsibility, such as Veetol and Microsoft.

The availability of resources for Sudanese civil society in 2025 was shaped by three interacting forces: global funding shocks, conflict-era gatekeeping by authorities, and structural constraints in Sudan's finance and communications infrastructure. First, the U.S. foreign-assistance pause announced on 24–26 January 2025 imposed stop-work orders on

existing awards with only narrow humanitarian waivers issued days later, triggering programme suspensions and layoffs across multiple contexts, including Sudan; UN and NGO interlocutors warned that the pause placed "millions in jeopardy", with sector surveys documenting widespread liquidity crunches among grantees dependent on U.S. flows. Conversely, the presence of grassroots organisations in nearby exile (Kenya, Uganda) provided an opportunity for relative continuity, albeit with limited resources and a heavy reliance on community solidarity networks.

Secondly, access to in-country resources—grants, cash, in-kind stock, and information—was narrowed by administrative veto points. In RSF-held areas, SARHO conditioned movement and delivery on co-operation agreements and escorts, restricting aid to RSF-controlled localities; in SAF-held zones, HAC and state bodies imposed visa/travel permit delays and "exorbitant financial demands", with visa backlogs surging to 299 pending cases in April 2025, materially constraining staff deployment and proposal delivery.

Thirdly, financial-system frictions grew. Under the Anti-Money Laundering and Counter-Terrorism Financing Act (2014), stringent due-diligence duties (including on civil-society recipients) and broad offences in s.35 (money-laundering) and s.36 (terrorism financing) encouraged bank de-risking, delaying transfers and account opening. In addition, the collapse of Sudan's banking system, soaring inflation driven by multiple exchange rates, reliance on black-market currency channels linked to UAE transfers, and intrusive official interference in defining acceptable humanitarian activities collectively prevented civil society organisations from accessing and using funds in ways aligned with their programme priorities. Connectivity interruptions—exam-period shutdowns and voice-call blocks—added transactional costs for local actors trying to access calls for proposals or submit digital documentation.

Despite these headwinds, pooled mechanisms such as the Sudan Humanitarian Fund (SHF) remained formally open and explicitly localisation-oriented, but could only partially offset the shock and access barriers. In addition, the European Union (EU) remained a major donor in Sudan, providing over €273 million in humanitarian aid in 2025 to address the catastrophic, conflict-driven crisis. The net picture from 2025 reporting—OCHA access snapshots, UN statements, and global NGO surveys—is one of declining accessibility, with the steepest drop for civil society actors working on sensitive protection issues and for volunteer-led mutual-aid groups attempting to navigate parallel regulatory orders.

3.2 | Effectiveness of Resources

Even where funds were nominally available, their effective use was repeatedly undermined by donor conditionalities interacting with conflict-era restrictions. Donor safeguards (counter-terrorism clauses, sanctions screening and AML/KYC) are routine, but in 2025 the U.S. foreign-aid stop-work orders froze drawdowns mid-performance, with limited waivers that were narrowly defined as "life-saving", disrupting multi-sector portfolios and leaving implementers with unreimbursed costs. On the SAF-linked government side, authorities constrained the use of resources by re-prioritising or redirecting assistance: SARHO interfered with targeting, limited operations to RSF-held areas, and mandated escorts; conversely, in Gedaref/Kassala, state authorities delayed technical agreements, denied travel permits, and imposed fees, all of which altered programme designs and cash-flow profiles. Legal frameworks reinforced these patterns. The 2006 Voluntary and Humanitarian Work Act centralises oversight in the Commission/Registrar (e.g., ss.18–22), enabling intrusive review of projects and funding; while framed as accountability, in practice it was frequently coupled with emergency-law powers to restrict movement and seize assets under Art. 5 of the 1997 Emergency and Public Safety Act, undercutting grantee autonomy.

Donor flexibility varied: the SHF and EU retained reserve/emergency allocations and localisation aims that allowed some rapid pivots, but these were insufficient against the scale of interference and the loss of U.S. streams. Security responsiveness was uneven; emblematic was April 2025, when Relief International lost 11 staff in Zamzam during RSF attacks, illustrating how resource effectiveness collapses when convoy deconfliction and duty-of-care fail—despite pooled-fund agility or donor waivers. Testimonies compiled by ACAPS, UN briefings and CSO networks converged on a decline in resource effectiveness, driven less by classical compliance burdens than by stop-start funding, movement interdictions, and acute security risks.

3.3 | Sustainability of Resources

Sustainability in 2025 hinged on diversification and predictability—both in short supply. Aggregate flows remained far below needs. The 2025 Humanitarian Needs and Response Plan (HNRP) sought US$ 4.16 bn, but by year's end had received about US$ 1.63 bn (≈ 39% coverage), with funding concentrated in a few large UN recipients and donor governments, magnifying vulnerability to single-donor policy shocks. The U.S. pause exposed those risks: the combination of stop-work orders and delayed reimbursements pushed organisations to mothball programmes, shed staff and burn reserves, with sector analyses warning of lasting damage to response capacity even if partial waivers resumed cash-flow for narrowly defined life-saving lines.

Pooled funds (notably the SHF), CERF allocations and EU funding mitigated some gaps and signalled support for localisation, including prospective windows for Mutual Aid Groups/Emergency Response Rooms, but remained finite relative to escalating need and access constraints. Structural stressors—bank de-risking under AML/CFT 2014 (ss. 35–36) and recurrent connectivity shutdowns that disrupted digital banking and grant administration—further eroded organisational staying power, particularly for national CSOs outside established UN/INGO consortia. In this context, self-reliance strategies (diaspora fundraising, volunteer mobilisation, micro-income activities) helped sustain small operations in exile hubs and within Sudan, but lacked scale and were repeatedly disrupted by movement and communications controls (see OCHA on visa backlogs and administrative interference).

Across reviewed 2025 sources—FTS data, pooled-fund briefs, UN/NGO analyses, panel discussions—the documented trend is downward: a narrowing and more volatile funding base, longer gaps between cycles, greater reliance on short-term instruments, and deteriorating staff conditions that collectively impair long-term planning and impact.

PRINCIPLE SCORE

4. Open and Responsive State

Score:

1 — **1.4** — 2 — 3 — 4 — 5
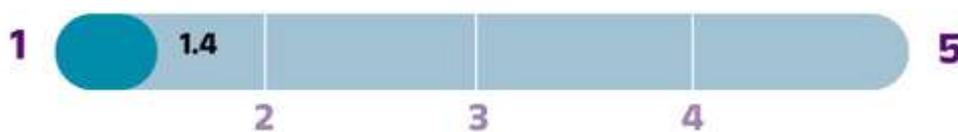
Across 2025, the principles of transparency, participation and accountability in Sudan deteriorated sharply as the administrative fragmentation between SAF and RSF rendered previously existing legal guarantees largely nominal. Although the Right to Access Information Act 2015—supplemented by Article 57 of the 2019 Interim Constitution—formally provide for public access to information, the state's routine use of security-based secrecy and the sweeping exemptions contained in Article 12 of the Act severely curtailed disclosure in practice. At the same time, meaningful participation by civil society collapsed as both authorities increasingly criminalised independent organising and restricted digital and physical spaces for engagement, a trend compounded by the widespread internet shutdowns documented in 2025 that impeded even minimal consultation mechanisms. Parallel to this, accountability structures all but disintegrated: the judiciary ceased to function across large parts of the country, executive decisions were issued without justification or avenues for review, and neither SAF nor RSF authorities provided explanations for policies or allowed follow-up on civil society input. Taken together, the developments of 2025 reflect not mere stagnation but a profound regression, with civil society denied the information, access, and institutional recourse necessary to monitor public power or influence decision-making in any meaningful way.

4.1 | Transparency

The right to access information in Sudan is formally recognised within the country's legal framework, including Article 57 of the 2019 Interim Constitution, which guarantees the freedom "to receive and publish information" and affirms the right to access the internet, as well as the Right to Access Information Act 2015, whose section 9 establishes the public's entitlement to obtain information from state bodies and section 8 provides for judicial review and the right to appeal to court where a request for information is not granted, although failing to designate

the competent court. This nominally progressive framework is [critically undermined](#) by its lack of provision for the obligation of proactive disclosure by information holders. It excludes private bodies from its scope, and Article 12 of this 2015 Act sets out a strikingly broad array of exemptions—spanning national security, foreign affairs, pre-decisional analyses and consultations, ongoing negotiations, judicial and administrative investigations, commercially sensitive material, personal data, confidential inter-institutional communications, and even information scheduled for future publication. The breadth and elasticity of these carve-outs effectively create a presumption of secrecy rather than openness, enabling authorities to reject requests on almost any discretionary basis. In practical terms, this severely constrains civil society organisations' capacity to secure timely, policy-relevant state information, thereby weakening their ability to monitor public power, scrutinise decision-making, and perform accountability functions that depend upon access to complete and contemporaneous records.

In addition, the collapse of formal governance structures has rendered these statutory guarantees largely inoperative. The war-induced administrative bifurcation between the SAF and the RSF produced not simply weak transparency, but what civil society actors describe as a sustained *information blackout*. In SAF-held areas, information was securitised and centralised, and military expenditure was shielded under broad interpretations of "national security"—a practice facilitated by vague security exemptions in the Access to Information Act itself, which permit non-disclosure on security grounds. Meanwhile, RSF-controlled territories lacked functioning administrative structures altogether, and public communication was reduced to digital propaganda disseminated through social-media channels rather than formal disclosures.

Events in 2025 illustrate the depth of this collapse. Internet shutdowns—[including exam-period shutdowns in July 2025](#), and the nationwide Starlink blackout of 8–9 November 2025—disrupted digital access to public records and official communication, further eroding transparency and public oversight. Freedom House's [Freedom on the Net 2025 report](#) confirms that intentional disruptions, destruction of telecommunications infrastructure, and widespread arrests for online activity severely restricted the public's ability to obtain or circulate information independently of state narratives. These conditions violate basic transparency principles: public institutions no longer publish draft policies, budgets, audits, or expenditure data, and where SAF-linked agencies publish decrees, these are rarely accessible online or accompanied by justification. In RSF zones, no equivalent documentation mechanisms exist at all.

Procedures for filing access-to-information requests, although clearly provided for in the 2015 Act, have therefore become wholly ineffectual. Although the 2015 law formally establishes statutory deadlines and appeal mechanisms, these are inaccessible in practice due to the non-functioning of ministries, the fragmentation of the judiciary, the absence of administrative focal points, and the ubiquitous communications disruptions. Civil society actors reported systematic deterioration, not merely stagnation, with transparency mechanisms collapsing under both deliberate state repression and physical infrastructure degradation. The overall trend is therefore one of decisive decline, marked by legal guarantees that exist only on paper and parallel authorities that neither recognise nor attempt to implement transparency norms.

4.2 | Participation

Participation in public decision-making, once sporadically enabled by Article 59 of the 2019 Constitution and through national dialogues and CSO consultations, has disintegrated under wartime governance. There is no operative legal framework guaranteeing CSO participation, and although Sudan's pre-war constitutional commitments—including consultative provisions

in the 2019 Constitutional Document—nominally recognised civic engagement, these were nullified first by the October 2021 coup and then by the SAF-RSF split. As of 2025, both de facto authorities employ security-centred governance that treats participation as a threat rather than a democratic norm.

Across SAF-held territories, civil society actors are viewed with suspicion, frequently accused of collaboration with the RSF or foreign agendas. RSF authorities adopt an equivalent stance, framing independent CSOs as aligned with the SAF or external hostile actors. Human rights testimonies throughout 2025 record the criminalisation of civic actors, with HRDs, women's groups, resistance committees and community organisers subjected to arbitrary detention, intimidation or forced displacement. These patterns mirror the broader digital repression seen in 2025, including the shutdowns that restricted online town halls and consultations. Where SAF-aligned administrative bodies function, civil society actors are not invited early into policy processes, nor provided material to comment on; in RSF areas, no formal avenues for consultation exist at all.

Participation opportunities—whether online or in person—are therefore unavailable or coercive in nature. Internet disruptions in January, July and November 2025 impeded remote engagement and destroyed the possibility of open digital forums, while insecurity rendered in-person meetings impossible in most regions. The U.S. foreign-assistance pause in January 2025, which triggered widespread shutdowns of humanitarian programmes across conflict zones, further removed one of the last domains in which CSOs were routinely consulted: humanitarian cluster coordination. With coordination platforms paralysed by staff suspensions, stop-work orders, and communications failures, civil society voices were excluded from strategic planning, resource prioritisation and needs assessments.

Evidence from 2025 and CSO testimonies reflect an unmistakable downward trajectory. Civil society has transitioned from partial interlocutor to an actor operating under acute threat, with policymakers—where they exist—neither soliciting input nor permitting independent expression. In both SAF- and RSF-held areas, participation is not merely inaccessible; it is actively dangerous.

4.3 | Accountability

Accountability mechanisms in Sudan during 2024–2025 have undergone near-total institutional collapse. Under normal conditions, the right to seek review of governmental decisions is grounded in Sudan's administrative law system, while judicial accountability is guaranteed by the Criminal Code, the Civil Procedure Act, and constitutional provisions for judicial independence. However, these mechanisms presuppose a functional judiciary, independent prosecutorial structures and a unified state, none of which exist under the SAF–RSF bifurcation.

By 2025, the judiciary had effectively ceased to operate in large parts of the country. Both de facto authorities replaced legal process with ad hoc security governance: in RSF areas, "field justice" determined by commanders superseded courts; in SAF-controlled zones, emergency decrees and military directives dominated regulatory and administrative decisions. This environment removed any meaningful avenue through which CS actors could follow up on how their input was used or seek explanations when their recommendations were disregarded.

The absence of accountability was starkly reflected in 2025 events. Internet shutdowns, notably the WhatsApp call suspension of 25 July 2025 and the Starlink blackout of 8–9 November 2025, were imposed without public notice, justification, or independent review—

contrary to global human-rights norms. Humanitarian access restrictions, visa backlogs and suspensions of NGO operations across SAF-held states likewise occurred without published decisions, explanations or appeals processes, directly contradicting rule-of-law principles evidenced in OCHA's 2025 reporting. In RSF areas, the imposition of cooperation agreements by SARHO similarly lacked transparency, review or safeguards.

Overall, the 2025 accountability landscape was characterised by profound regression. Civil society actors could not obtain explanations, pursue complaints, or track compliance with public commitments; no formal spaces existed for follow-up; and the conditions necessary for independent oversight had been disintegrated. The overall trend is one of marked decline, driven by institutional collapse, securitisation, and the deliberate dismantling of accountability norms by all parties to the conflict.

PRINCIPLE SCORE

5. Supportive Public Culture and Discourses on Civil Society

Score:

1   1.7   5

2   3   4
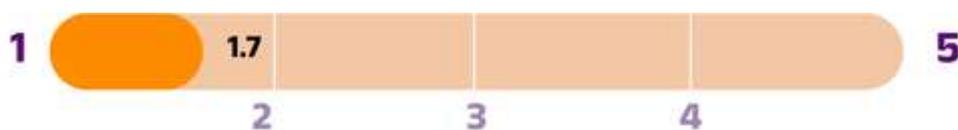
5.1 | Public Discourse and Constructive Dialogue

Public discourse concerning civil society actors in Sudan during 2025 was shaped by securitised narratives propagated by both the SAF and the RSF. Government-aligned voices routinely framed independent organisations as politically suspect, foreign-influenced or subversive, a trend reinforced by the broader climate of emergency rule documented by the [CIVICUS Monitor](#), which downgraded Sudan's civic space to its lowest "Closed" rating in December 2025, citing widespread threats, arrests and killings of activists and journalists by both parties. Media discourse played a central role in amplifying these delegitimising frames. The collapse of Sudan's media ecosystem—[over 90% of media infrastructure destroyed](#) and at least nine journalists killed by May 2025, according to UNESCO—produced an information vacuum in which [unchecked propaganda](#), hate speech and partisan narratives proliferated. Both SAF and RSF expanded their own partisan media outlets, while independent journalists fled or worked clandestinely, resulting in an environment where evidence-based dialogue became virtually impossible.

The climate of dialogue in 2025 thus became polarised, exclusionary and dominated by militarised rhetoric. The widespread weaponisation of digital platforms including deliberate internet shutdowns, cyberattacks on independent media and orchestrated disinformation campaigns by both forces—further eroded opportunities for constructive engagement. Within this hostile discursive landscape, civil society organisations' ability to contribute meaningfully became severely restricted; their interventions were increasingly drowned out or actively targeted through defamation, arrests or digital surveillance.

Key incidents in 2025—including the May *World Press Freedom Index*, which ranked Sudan 156th of 180 countries due to intensified threats and attacks on journalists—illustrate the

severity of this decline. The escalation of hate speech identified in late-2025 by civil society actors underscores further erosion of civic discourse. CSO testimonies gathered through the panel of experts stressed that while their expertise informed some operational response, it was consistently excluded from political processes. Overall, the trajectory of 2025 indicates steep deterioration: public discourse became more hostile, less pluralistic and structurally incompatible with civil society's monitoring, advocacy and peacebuilding roles.

5.2 | Perception of Civil Society and Civic Engagement

Public perceptions of civil society and civic engagement in 2025 were profoundly shaped by the wartime environment, institutional collapse and the predominance of militarised narratives. While communities generally viewed grassroots civic initiatives—such as Emergency Response Rooms (ERRs)—as vital lifelines, state and de facto authorities frequently portrayed them as illegitimate, foreign-influenced or politically partial. Civil society actors highlighted that the SAF and RSF forces repeatedly targeted local volunteers, accusing them of collaboration with the opposing side and subjecting them to harassment, abductions and extrajudicial killings. This dynamic created a stark divide between community trust and official hostility.

Citizen belief in their capacity to influence political decision-making, already fragile before the war, deteriorated even further as political processes became fully militarised and international mediation frameworks excluded civil society participation. Civil society actors' assessment concluded that civilian participation had been "crushed," with curfews, displacement and insecurity all but eliminating avenues for peaceful engagement. Simultaneously, civic education suffered a near-total collapse as more than 17 million children were out of school due to conflict, displacing the principal channels through which civic literacy and democratic engagement could develop.

Despite this repression, civil society retained significant social legitimacy among communities. Local mutual-aid networks, women's collectives, youth groups and diaspora-led documentation efforts expanded rapidly as state institutions disintegrated. International humanitarian actors consistently emphasised the centrality of Sudanese CSOs, even while acknowledging fragmentation and severe constraints. Public perceptions were further shaped by emblematic incidents such as the April 2025 killing of 11 humanitarian workers in Zamzam camp, which reinforced the narrative of CSOs as both indispensable and at extreme risk.

Accounts from Sudanese journalists and activists highlighted the extraordinary resilience of civic actors operating under threats of violence, detention and exile. The overall trend reflects this paradox: formal civic engagement declined drastically, yet public appreciation for local civil society grew, driven by the visibility of grassroots humanitarian solidarity amid state collapse.

5.3 | Civic Equality and Inclusion

Civic equality and inclusion in Sudan during 2025 were deeply eroded by the interaction of legal failure, social fragmentation and wartime violence. Constitutional protections guaranteeing equality—particularly Articles 44 and 48 of the 2019 Interim Constitution— became non-operative under fragmented military rule. SAF- and RSF-controlled authorities replaced legal safeguards with arbitrary enforcement, emergency decrees and movement restrictions. Civil society actors reported systematic curfews, checkpoints, arbitrary detentions and targeted attacks on activists, illustrating how fundamental civil and political rights became inaccessible to most Sudanese citizens.

Social and economic inequalities intensified as widespread displacement—over [10.8 million internally displaced persons](#) and [25.6 million people experiencing acute food insecurity](#)—severely limited the capacity of marginalised groups to participate in public life. Women, ethnic minorities and persons with disabilities faced particularly acute risks.

Inequalities in access to information deepened as well. Internet disruptions—including the January 2025 end of a year-long blackout in Wad Madani and repeated battle-related shutdowns—disproportionately hindered participation for rural communities, women and displaced people. The proliferation of hate speech and propagandistic narratives, widely analysed in late-2025 conflict assessments, further marginalised minority groups and eroded social cohesion.

CSO testimonies throughout 2025 reported that women, minority communities and youth were systematically excluded from political negotiation forums, including ceasefire discussions and regional diplomatic processes. The absence of mechanisms through which these groups could monitor decision-making or challenge discriminatory practices escalated the situation. The overall pattern is one of pronounced regression: constitutional protections ceased to function, structural inequalities widened and wartime governance entrenched civic exclusion across both SAF- and RSF-controlled territories.

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PRINCIPLE SCORE

6. Access to a Secure Digital Environment

Score:

1 —————— 2 —————— 3 —————— 4 —————— 5
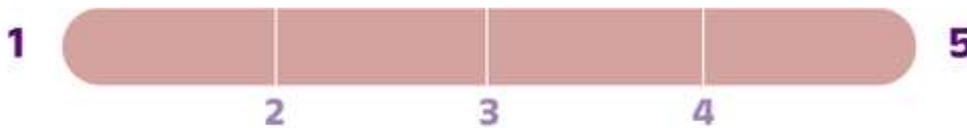
Across 2025, Sudan's digital environment for civil society experienced a marked and interlinked deterioration across rights, security and accessibility. Internet and platform shutdowns—including the January restoration of Wad Madani after a year-long blackout, the 25 July suspension of WhatsApp calls, repeated exam-related outages, and the 8–9 November nationwide Starlink blackout—became routine tools of wartime information control deployed by both SAF and RSF, severely constraining online expression and civic coordination. These disruptions unfolded alongside escalating censorship and surveillance, underpinned by the October 2025 Cybercrime Law amendments, which introduced 10-year prison sentences and warrantless digital searches for broadly defined offences such as "insulting the prestige of the state," enabling intensified targeting of activists, journalists and CSOs. At the same time, cyberattacks, coordinated disinformation, mass-reporting campaigns, and content deletions eroded digital security, while the absence of data-protection laws or functioning judicial mechanisms left CSOs without any recourse against breaches or surveillance. Digital accessibility deteriorated as fighting destroyed telecom infrastructure, ISPs struggled to operate, and civilians increasingly relied on prohibitively expensive and intermittently blocked Starlink connections; meanwhile, widespread digital illiteracy left populations more vulnerable to propaganda and AI-driven manipulation. Collectively, these developments demonstrate a sharply declining trajectory, with Sudan's digital sphere becoming more repressive, insecure and structurally exclusionary for civil society actors.

6.1 | Digital Rights and Freedoms

Digital rights and freedoms in Sudan deteriorated significantly throughout 2025 as the country became one of the most disrupted digital environments on the continent. Internet and social-media shutdowns occurred with increasing frequency and severity, forming a deliberate wartime strategy for both the SAF and RSF. Major incidents included the January 2025 lifting of the year-long blackout in Wad Madani, continued intermittent disruption due to RSF control,

the 25 July national suspension of WhatsApp calls, and a two-day nationwide Starlink blackout from 8–9 November 2025, imposed during intensified fighting in Kordofan and El-Fasher. These events followed repeated tactical outages linked to university examinations, military offensives, and territorial power shifts. Freedom House's *Freedom on the Net 2025* report similarly noted that deliberate disruptions—including shutdowns in Khartoum during active clashes—systematically obstructed documentation of crimes and delivery of humanitarian aid.

The legal framework underpinning digital rights was further weakened by the 2025 amendments to the Cybercrime Law, approved by the military-controlled cabinet in October 2025. These amendments impose penalties of up to 10 years' imprisonment and fines of up to 10 million Sudanese pounds for vaguely defined offences such as "insulting the prestige of the state" and "threatening social peace," and authorise warrantless digital searches and device confiscation. Such provisions directly contradict Article 57 of the 2019 Constitutional Declaration, which protects freedom of expression and access to information. Enforcement has been aggressive: security forces have used the law to silence journalists and critics, as documented by multiple rulings criminalising online expression.

Government censorship and surveillance of CSOs were pervasive. Both SAF and RSF used social-media platforms to spread disinformation while simultaneously targeting independent accounts with mass-reporting campaigns and cyberattacks designed to delete content. Private platforms such as Facebook and X became sites of orchestrated harassment, with bot networks amplifying propaganda or labelling activists as "traitors." Internews' 2025 media-ecosystem mapping similarly found coordinated digital manipulation shaping online narratives in ways that systematically marginalised civil society voices.

Persecution for online activity intensified. Journalists and activists were detained or disappeared for digital reporting, while several were killed in the line of duty, adding to the ≥9 journalist deaths recorded by UNESCO by mid-2025. In July 2025, SLM–TC members affiliated with SAF arrested freelance journalists Nasr Yaqoub and Mohamed Ahmed Nazar in El-Fasher for using a Starlink device to report online, demonstrating the ongoing arrest, detention, and prosecution of journalists in Sudan for their digital activities. The overall trend for 2025 was one of rapid decline: shutdowns expanded, censorship became systematic, and the legal environment shifted decisively toward criminalising civil society's online presence.

6.2 | Digital Security and Privacy

The digital security environment for civil society actors in Sudan during 2025 was characterised by pervasive surveillance, cyberattacks, arbitrary enforcement of cybercrime legislation, and the near-total absence of privacy protections. Both Freedom House and Internews documented repeated cyberattacks—including hacking, account takeovers and targeted deletion of content—aimed at silencing independent reporting. These attacks were often accompanied by mass-reporting campaigns orchestrated by coordinated networks seeking to trigger account suspensions. While specific technical attributions remain difficult due to the collapse of judicial oversight, the targeting pattern strongly suggested involvement by armed groups and affiliated security agencies.

Sudan lacks a dedicated data-protection law, leaving digital privacy almost entirely unregulated. The only partial protections are embedded in the Electronic Transactions Act 2007, which criminalises forged electronic documents but does not establish privacy safeguards, oversight bodies or redress mechanisms. The absence of statutory protection leaves CSOs with no formal avenue to report surveillance, data breaches or digital violations—

an issue compounded by the collapse of the judiciary and the use of emergency security structures in lieu of courts.

The 2025 Cybercrime Law amendments further intensified digital insecurity. They permit warrantless searches and device confiscation, and empower the Public Prosecution to investigate so-called "information crimes" without judicial approval, creating an environment ripe for abuse. Human-rights bodies have documented the use of this law to criminalise online speech, including cases such as the January 2026 sentencing of activist Ayman Hariri under Cybercrime Act Articles 24–25 for a Facebook post. Such cases demonstrate a pattern of punitive digital policing targeting civic voices.

Disinformation and digital manipulation were also widespread. Late-2025 conflict analyses highlighted extensive networks spreading hate speech and inflammatory narratives, often aligned with military actors. Freedom House similarly documented that both SAF and RSF used online propaganda to steer narratives and justify violence. The RSF has reportedly deployed Predator spyware to infiltrate the phones of key activists. Meanwhile, SAF intelligence units monitor social media to track and arrest volunteers associated with the ERRs. Combined with surveillance and harassment, these tactics created an exceedingly hostile online environment in which CSOs could neither communicate securely nor advocate without significant risk.

The overall trajectory for 2025 shows continued decline. Cyberattacks intensified, surveillance expanded, and punitive cybercrime enforcement further narrowed the space for digital dissent, leaving CSOs with almost no meaningful digital security or privacy protections.

6.3 | Digital Accessibility

In 2025, Datareportal reveals that digital access in Sudan remained severely limited, with only 42.4% of the population holding mobile connections, 28.7% using the internet, and just 7.2% active on social media, highlighting deep structural barriers to meaningful connectivity. Digital accessibility collapsed further in 2025 as the civil war devastated telecommunications infrastructure, accelerated shutdown patterns, and made basic connectivity prohibitively expensive or entirely unattainable for many communities. Intense fighting in Khartoum and Darfur has physically destroyed data centres and cell towers. Major ISPs (Zain, Sudani, MTN) struggled to keep networks online without fuel or safety for technicians.

Internet shutdowns and disruptions were frequent and severe: the year-long blackout in Wad Madani, lifted only in January 2025, was followed by intermittent outages; WhatsApp voice and video calls were blocked nationwide on 25 July 2025; repeated exam-related shutdowns occurred from 7–10 July 2025; and the 8–9 November 2025 nationwide Starlink blackout cut off a critical humanitarian lifeline. Freedom House emphasised that the destruction of telecom infrastructure and the occupation of data centres by armed groups continued to impede access across large parts of the country.

Infrastructure destruction also shaped accessibility: fighting in Khartoum and Darfur repeatedly damaged fibre cables, telecom towers and ISP facilities, as documented in shutdown chronologies. As a result, network quality deteriorated sharply, and mobile and fixed-line services became unreliable or unavailable. Starlink emerged as a crucial alternative for humanitarian actors and Emergency Response Rooms (ERRs). However, Freedom House noted that Starlink remained prohibitively expensive, with RSF-controlled areas charging exorbitant prices due to black-market distribution.

Digital literacy among the general population remains low, worsening vulnerability to disinformation and AI-generated propaganda. Internews' 2025 media-ecosystem mapping found that the online information space was dominated by manipulated content, propaganda and AI-assisted campaigns, while the collapse of media institutions eliminated the traditional gatekeepers that could counter misinformation. Freedom House highlighted the spread of hate speech and false narratives as a driving factor in undermining public understanding and civic engagement. This environment requires advanced digital literacy to navigate, yet CSOs and communities lack the tools, training or stable connectivity necessary to do so effectively.

Exam-related shutdowns, city-wide telecom blackouts, and platform-level restrictions—documented across technical analyses and Freedom House reporting—further hindered CSOs' ability to share content, coordinate activities or mobilise communities. These constraints compounded physical insecurity, limiting real-world assembly and communication.

The overall trend for 2025 is continued decline. Connectivity became less available, less affordable and less reliable, while the digital-skills gap widened. CSOs increasingly relied on fragile, expensive or clandestine networks, undermining their ability to operate, coordinate or engage meaningfully in the digital sphere.

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C) Recommendations

I. Recommendations to the SAF and RSF (De Facto Authorities)

1. Cease attacks on civilians and critical infrastructure, including telecommunications facilities, humanitarian convoys, media institutions and civilian shelters, in line with obligations under international humanitarian law (IHL).

2. Lift all internet shutdowns, platform restrictions, and communication blockages, including exam-related and wartime outages, and refrain from imposing new ones. Internet access is essential for humanitarian coordination, civilian safety, and freedom of expression.

3. Suspend enforcement of the 2025 Cybercrime Law amendments that criminalise dissent through vague offences such as "insulting the prestige of the state" and enable warrantless searches, and begin revising the law to align with Article 19 ICCPR on freedom of expression.

4. End surveillance, intimidation, arbitrary arrests, and enforced disappearances of journalists, digital activists, volunteers, and civil society members, including those engaged in documentation work.

5. Guarantee safe and unhindered access for humanitarian organisations, including local CSOs, ERRs, women's groups and community networks, across all controlled areas without coercive registration requirements or politicised travel-permit systems.

6. Publicly commit to allowing independent media to operate safely, including through protection of journalists, non-interference with reporting, and prosecution of personnel engaged in attacks against media workers.

7. Restore administrative transparency, including by publishing decisions affecting civil society, humanitarian access and digital controls, so that civilians and organisations can plan and operate independently.

8. Ensure equitable access to telecommunications, including by permitting the lawful use of satellite internet devices and preventing confiscation of connectivity tools used for humanitarian purposes.

9. Facilitate independent investigations into allegations of war crimes, media killings, digital targeting and obstruction of aid, by granting secure access to investigators and ensuring non-retaliation against witnesses.

II. Recommendations to Sudanese Civil Society

1. Strengthen coordination between in-country and diaspora-based CSOs, ensuring continuity of documentation, advocacy, and service delivery even when domestic conditions deteriorate.

2. Develop secure digital-security practices, including encrypted communication channels, VPN use, password management, device-hardening and training members to avoid surveillance and phishing risks.

3. Form thematic coalitions (e.g., women's rights, humanitarian response, atrocity-documentation, digital rights) to unify advocacy messages and minimise duplication in a fragmented civic environment.

4. Diversify funding streams, including partnerships with diaspora communities, regional networks, and pooled-fund mechanisms, to reduce dependency on a single donor and maintain operational resilience.

5. Invest in training for conflict-sensitive communication and digital verification, enabling volunteers to counter disinformation and produce trustworthy, locally grounded reporting.

6. Use exile-based platforms, research centres, and international media outlets to amplify evidence of violations, in anticipation of future transitional justice or accountability mechanisms.

7. Support community-level civic education, including basic digital literacy, rights awareness, and counter-hate-speech initiatives, delivered through informal networks or remote learning where possible.

8. Develop humanitarian early-warning networks using available connectivity tools (e.g., Starlink, diaspora-supported relays), ensuring that local populations receive timely alerts even during shutdowns.

9. Continue documenting violations systematically, maintaining secure, backed-up, chain-of-custody-compliant records for future accountability processes.

III. Recommendations to Donors and the International Community

1. Apply coordinated diplomatic pressure on both SAF and RSF to end attacks on civilians, halt obstruction of humanitarian assistance, cease internet shutdowns and comply with IHL and international human rights law.

2. Provide urgent protection mechanisms for journalists and human rights defenders, including emergency relocation, digital-security support, and funding for legal assistance.

3. Support safe evacuation corridors for journalists and civil society members at acute risk, whether within Sudan or across borders, ensuring confidential referral channels.

4. Finance independent Sudanese media platforms, both domestic and diaspora-based, to rebuild a pluralistic information ecosystem capable of countering propaganda and documenting abuses.

5. Increase multi-year, flexible funding to local CSOs, enabling them to sustain operations despite displacement, banking collapse, or digital repression. This includes direct funding rather than channeling predominantly through international intermediaries.

6. Invest in digital-rights protection, including tools to circumvent shutdowns, secure communications technology, satellite internet subsidies, and training in cyber-protection.

7. Support accountability mechanisms, such as the UN Fact-Finding Mission, ICC processes, and regional human-rights bodies, through evidence preservation, forensic analysis, and witness-protection programmes.

8. Expand capacity-building programmes for civil society, including training on conflict-sensitive reporting, organisational governance, digital security, humanitarian negotiation, and community mediation.

9. Ensure all diplomatic, humanitarian and development engagements include structured consultation with Sudanese CSOs—including women, youth, and marginalised groups—rather than limiting participation to political elites or armed actors.

D) Research Process

Each principle encompasses various dimensions which are assessed and aggregated to provide quantitative scores per principle. These scores reflect the degree to which the environment within the country enables or disables the work of civil society. Scores are on a five-category scale defined as: fully disabling (1), disabling (2), partially enabling (3), enabling (4), and fully enabling (5). To complement the scores, this report provides a narrative analysis of the enabling or disabling environment for civil society, identifying strengths and weaknesses as well as offering recommendations. The process of drafting the analysis is led by Network Members; the consortium provides quality control and editorial oversight before publication.

For Principle 1 - which evaluates respect for and protection of freedom of association and peaceful assembly - the score integrates data from the CIVICUS Monitor. However, for Principles 2–6, the availability of yearly updated external quantitative indicators for the 86 countries part of the EUSEE programme are either limited or non-existent. To address this, Network Members convene a panel of representatives of civil society and experts once a year. This panel uses a set of guiding questions to assess the status of each principle and its dimensions within the country. **The panel for this report was convened in September 2025.** The discussions are supported by secondary sources, such as V-Dem, the Bertelsmann Stiftung Governance Index, the RTI Rating from the Centre for Law and Democracy, and other trusted resources. These sources provide benchmarks for measuring similar dimensions and are complemented by primary data collection and other secondary sources of information available for the country. Guided by these deliberations, the panel assigns scores for each dimension, which the Network Members submit to the Consortium, accompanied by detailed justifications that reflect the country's specific context. To determine a single score per principle, the scores assigned to each dimension are aggregated using a weighted average, reflecting the relative importance of each dimension within the principle. This approach balances diverse perspectives while maintaining a structured and objective evaluation framework.