

Strengthening NHRI action online and offline through ROAM-X and Human Rights Impact Assessments in the digital age

A Brief for National Human Rights Institutions

Executive summary

Digital technologies increasingly shape how people enjoy their human rights. The rights protected under the [Universal Declaration of Human Rights](#) and international human rights law apply online and offline. As digital technologies become integral to public life, National Human Rights Institutions (NHRIs) are progressively called on to monitor and address online threats against journalists and human rights defenders, surveillance, discrimination, exclusion from digital services and restrictions on civic space.

Two complementary frameworks support this work. [UNESCO's Internet Universality ROAM-X Indicators](#) assess whether national Internet environments are grounded in human rights, openness, accessibility, multistakeholder participation, and cross-cutting themes such as gender equality, safety online and environment. The [UNESCO/OHCHR Guidance for Human Rights Impact Assessment on Digital Platforms](#) ("the Guidance") provides a practical framework for assessing how digital platforms¹ identify and address human rights risks. Both frameworks can support NHRIs in monitoring human rights in digital environments at the national and international levels, identifying risks and gaps, and informing recommendations to States and digital platforms.

Developed jointly by UNESCO and GANHRI, this briefer explains how they can support NHRIs in protecting and promoting human rights in the digital environment and strengthen monitoring, policy advice, engagement with digital platforms and international reporting.

1. Why are human rights in the digital environment central to NHRI mandates?

Digital technologies increasingly affect all areas of NHRI work, including monitoring, complaints handling, investigations, policy advice, engagement with rights holders and reporting to regional and international mechanisms.

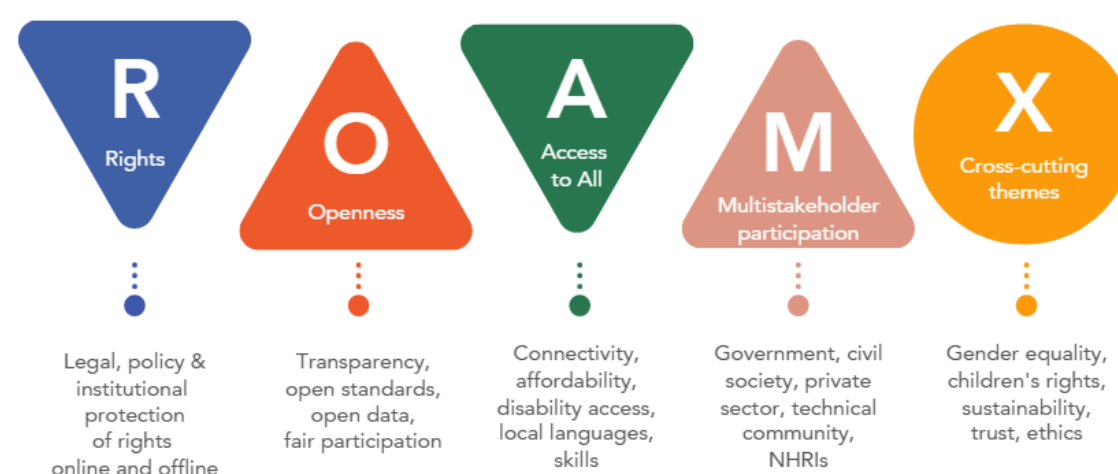
Complaints and investigations increasingly involve surveillance, unlawful disclosure of personal data, online harassment, restrictions on freedom of expression, discrimination in automated systems, or threats against journalists and human rights defenders. NHRIs are also increasingly called upon to provide legislative and policy advice on issues such as data protection, artificial intelligence, cybersecurity, digital identity systems, and platform content governance.

These are not a separate category of rights, but existing human rights standards applied to new forms of communication, governance, service delivery and civic participation. Restrictions on online expression affect freedom of expression and public participation; unlawful surveillance undermines privacy and civic space; and exclusion from digital services reinforces inequalities.

Digital risks are not experienced equally. [Women journalists and human rights defenders](#) face gender-based abuse; [minority groups](#) experience hate speech or exclusion; persons with disabilities face barriers to accessible services; and Indigenous, rural and linguistic communities encounter challenges related to connectivity, affordability and representation. An **intersectional approach is essential**, and ROAM-X and the Guidance support NHRIs in assessing digital environments and platform-related risks through practical, standards-based methodologies.

2. What UNESCO's Internet Universality ROAM-X indicators offers to NHRIs?

UNESCO's Internet Universality ROAM-X Indicators provide a framework for assessing the extent to which a country's Internet environment supports human rights and inclusive, open and accessible digital development. The framework uses evidence, data and stakeholder input to identify strengths, gaps and areas for improvement in laws, policies, institutions and practices. It is structured around five mutually reinforcing dimensions:



¹ A 'digital platform' refers to a provider of software for an information-sharing service that connects users to facilitate the dissemination of information and content, such as social media, search engines or creative content outlets, with a relevant presence, size, reach and market share in a specific jurisdiction, as outlined in the UNESCO Guidelines for the Governance of Digital Platforms.

For NHRIs, ROAM-X can support **three key areas of work**.

A. Supporting evidence-generation, monitoring and reporting

NHRIs often identify individual cases of online harm but need frameworks to connect them to broader systemic patterns across the online and offline environments. ROAM-X indicators help NHRIs organise evidence on laws, policies, institutions, access gaps, complaints, court decisions, public practices and the experiences of affected groups. This can support baseline assessments, thematic reports, inquiries and follow-up monitoring.

For example, rather than focusing only on individual complaints, an NHRI examining barriers to accessing digital public services could use ROAM-X to assess whether digitalisation policies adequately address affordability, accessibility, language barriers, digital literacy and the needs of rural or marginalised communities.



Country example: ETHIOPIA
Using NHRI evidence to assess digital rights challenges

In Ethiopia, [the ROAM-X assessment](#) incorporated findings from **the Ethiopian Human Rights Commission** on online harassment and abuse. The evidence helped inform the assessment of challenges related to safety, freedom of expression, equality and participation in digital spaces. Building on this experience, the Commission could use the ROAM-X Indicators to structure its own monitoring of human rights in the digital environment, connect individual cases to broader systemic patterns, and identify gaps across the “Rights” and “Accessibility to all” dimensions.

B. Connecting human rights standards with digital policy discussions

Digital policy debates are often framed in technical, economic or security languages. ROAM-X translates human rights standards into practical questions for policymakers. It enables assessment on whether laws and policies on cybersecurity, data protection, artificial intelligence, platform regulation, digital identity or connectivity are consistent with human rights obligations.

When reviewing a cybersecurity law, an NHRI can use ROAM-X to ask whether the law contains safeguards against overbroad surveillance, protects privacy, respects freedom of expression, provides independent oversight and ensures access to effective remedies.



Country example: GEORGIA
Assessing human rights risks in AI governance

The **Public Defender of Georgia** has examined the use of artificial intelligence across public institutions. In its [2025 special report](#), the Public Defender analysed information from 77 public institutions and identified potential risks to privacy, freedom of expression and other rights arising from the use of AI in public administration. It subsequently called for a clearer regulatory framework and safeguards. Building on this approach, the ROAM-X Indicators could help structure a broader assessment of AI governance within the national digital environment, including relevant laws, policies, safeguards and institutional practices under the “Rights” and “Cross-cutting issues” dimensions.

C. Facilitating dialogue among stakeholders

Because ROAM-X is grounded in multistakeholder participation, it can help NHRIs convene actors that do not regularly collaborate, including ministries, regulators, data protection authorities, electoral bodies, digital platforms, civil society organizations, journalists, technical experts, academia, equality bodies and affected communities.



Country example: COLOMBIA
Building multi-stakeholder approaches to protect democratic participation

The **Ombudsman’s Office of Colombia** launched the [“Commitment to a Free and Peaceful Electoral Process”](#) initiative to promote non-violence, democratic dialogue and access to truthful information during elections. Developed in cooperation with the Electoral Observation Mission and supported by public institutions, civil society, media and international actors, the initiative brought together political actors around shared principles and used a monitoring system combining online and offline media analysis, keyword identification in social media, candidate self-assessments and a compliance matrix. Building on this approach, the Ombudsman’s Office could use the ROAM-X Indicators to structure and expand its assessment of the digital dimensions of electoral participation, including online access to information, digital civic space, multi-stakeholder participation, trust and security.

3. What the Guidance for Human Rights Impact Assessment on Digital Platforms offers to NHRIs

The Guidance is addressed primarily to companies and digital platforms, but it also gives NHRIs a framework for assessing whether platforms are identifying and addressing their human rights responsibilities. The Guidance proposes a four-stage process that platforms can use to assess and address their human rights impacts:



Digital platforms enable access to information, freedom of expression, and civic participation. Yet, their policies, products and design choices can also generate or reinforce risks: arbitrary content removal, account restrictions, online harassment, opaque moderation practices, algorithmic amplification of harmful content, limited access to remedy and insufficient safeguards against undue pressure. These risks fall hardest on journalists and human rights defenders who rely on digital platforms to communicate, document abuses and engage with the public.

NHRIs can use the Guidance as a reference point when engaging with platforms, regulators and civil society on how such risks are being identified, prevented and addressed in ways that reflect national contexts and the experiences of affected groups.

4. Using ROAM-X and the Guidance together: a complementary approach for NHRIs

ROAM-X and the Guidance serve different but complementary purposes.



The table illustrates how NHRIs can use both frameworks in a complementary manner.

NHRI function		ROAM-X contribution	Guidance contribution
	Monitoring	Identifies systemic gaps affecting human rights in the digital environment	Examines risks linked to platform policies, products and services
	Complaints & investigations	Connects individual cases to broader legal, policy and institutional patterns	Assesses whether platform practices contributed to harm and whether remedies are available
	Legal & policy advice	Supports assessment of laws and policies against human rights-based Internet principles	Examines whether regulatory frameworks address platform responsibility, transparency, due diligence and remedy
	Public reporting	Provides evidence and indicators for national assessments and thematic reports	Adds analysis of platform accountability and risks affecting critical voices
	International reporting	Supports evidence and supports measurable recommendations on digital rights	Supports recommendations related to platform accountability, protection of journalists and defenders, and access to remedy
	Civil society engagement	Supports consultation with affected groups and stakeholders	Informs engagement with journalists, defenders and communities facing heightened risks
	Dialogue with regulators and platforms	Creates a shared evidence base on national digital challenges	Provides concrete questions on platform policies and accountability measures

Using both frameworks for international reporting

NHRIs can use ROAM-X Indicators to build evidence on the national digital environment and the Guidance to analyse platform-related impacts and corporate responsibility. They do not replace existing human rights monitoring mechanisms but provide additional evidence on digital dimensions of rights.

Together, the frameworks can strengthen submissions to the Universal Periodic Review (UPR), treaty bodies and Special Procedures, linking individual experiences, systemic challenges and recommendations to international standards.²

After the UPR, NHRIs can use both frameworks to monitor implementation of accepted recommendations. For example:

- On strengthening privacy protections, NHRIs can track whether data protection laws, oversight bodies, remedies and surveillance safeguards improve in practice (ROAM-X).
- On protecting journalists, NHRIs can assess whether platforms and public authorities have improved prevention, mitigation and remedy for online attacks (the Guidance).

5. Practical use cases

CASE 1

Protecting journalists and human rights defenders during elections

Relevant ROAM-X dimensions:

R

M

X

Elections are high-risk periods for freedom of expression, participation and access to information. Journalists and human rights defenders may face online harassment, disinformation campaigns, threats, arbitrary content removal or account restrictions. Public authorities may also seek the removal of content or access to user data.

ROAM-X can help an NHRI assess whether the broader legal and institutional environment protects expression, privacy, association and participation during elections.

The Guidance can support engagement with platforms on election-related risk assessments, transparency around government requests, emergency response mechanisms, appeals processes and protections for critical voices.

CASE 2

Responding to online gender-based violence

Relevant ROAM-X dimensions:

R

A

X

Women journalists and women human rights defenders may face online gender-based attacks intended to silence them, including threats of sexual violence, image-based abuse, smear campaigns and harassment.

ROAM-X can help an NHRI examine how these harms relate to equality, non-discrimination, freedom of expression, privacy and participation.

The Guidance can support assessment of whether platforms provide gender-responsive reporting channels, local-language support, effective remedies, safeguards against repeated abuse and meaningful engagement with women’s rights organizations.

CASE 3

Addressing exclusion from the digital environment

Relevant ROAM-X dimensions:

R

A

X

Access to the Internet and digital services is increasingly connected to access to education, work, health, public information, social protection and participation. Exclusion from the digital environment can therefore deepen existing inequalities.

ROAM-X can help NHRIs identify barriers affecting rural communities, women, persons with disabilities, linguistic minorities, low-income groups and other communities facing exclusion. This analysis can inform recommendations on affordability, accessibility, local language content, digital skills and inclusive public services.

The Guidance can complement this work by supporting assessment of whether platform tools, reporting systems and safety mechanisms are accessible and responsive to different communities.

CASE 4

Reviewing platform regulation or online safety laws

Relevant ROAM-X dimensions:

R

O

M

Governments are increasingly adopting laws on online safety, disinformation, hate speech, cybersecurity and platform accountability. While some measures aim to protect users, others may create risks of censorship, surveillance or excessive restrictions on lawful expression.

ROAM-X can help NHRIs assess whether proposed legislation aligns with human rights, openness, accessibility and participation principles.

The Guidance can inform recommendations on platform responsibilities, including human rights due diligence, transparency reporting, independent oversight, effective remedies and safeguards for journalists, defenders and civil society.

NHRIs can use ROAM-X as a backbone for UPR reporting. A strong NHRI UPR submission could include:

☒ A short assessment of the national Internet environment.

☒ Evidence on key rights gaps.

☒ Examples of affected groups.

☒ Analysis of laws and policies.

☒ Platform-related risks drawn from the Guidance.

☒ Measurable recommendations.

☒ Suggested indicators for follow-up.

² See UNESCO, *The Universal Periodic Review (UPR) and its potential to foster freedom of expression, access to information and safety of journalists: Guidelines for National Human Rights Institutions (NHRIs)*, which provides guidance on how NHRIs can engage with the UPR on these themes.

6. Recommended actions for NHRIs

The following seven actions can help NHRIs integrate human rights in the digital environment into their existing mandates and make practical use of ROAM-X and the Guidance.



7. Practical next steps

The following roadmap can be adapted to each national context and NHRI mandate.

First 3 months	3-9 months	9-15 months
☐ Appoint a focal point or working group	☐ Hold consultations with journalists, defenders and affected communities	☐ Publish a baseline or thematic report
☐ Map existing complaints and public concerns	☐ Engage regulators, public authorities and platforms	☐ Issue recommendations to government, regulators and platforms
☐ Identify priority ROAM-X indicators	☐ Gather evidence for policy advice, reporting or UPR submissions	☐ Include evidence in international reporting
☐ Review the Guidance and prepare platform accountability questions	☐ Identify priority legal or policy reforms	☐ Follow-up on implementation
☐ Identify civil society, journalists, academics and technical partners	☐ Develop intake questions, investigation protocols or monitoring checklists	☐ Update findings as technologies and risks evolve

8. Key resources

- [UNESCO, Internet Universality: Advancing Inclusive Digital Transformation with ROAM-X Indicators \(2024\).](#)
- [UNESCO, ROAM-X National Assessment Reports.](#)
- [UNESCO and OHCHR, Protecting Critical Voices: Guidance for Human Rights Impact Assessment on Digital Platforms.](#)
- [UNESCO, Guidelines for the Governance of Digital Platforms: Safeguarding Freedom of Expression and Access to Information through a Multistakeholder Approach.](#)
- [UNESCO, The Universal Periodic Review \(UPR\) and its potential to foster freedom of expression, access to information and safety of journalists: Guidelines for National Human Rights Institutions \(NHRIs\).](#)
- [Ethiopian Human Rights Commission / UNESCO, Assessing Internet Development in Ethiopia.](#)
- [Public Defender of Georgia, Artificial Intelligence as a Threat of Negative Impact on the Protection of Human Rights.](#)
- [Defensoría del Pueblo de Colombia, materials on the Commitment to a Free and Peaceful Electoral Process and related monitoring.](#)

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