SPECIAL PROCEDURES
UNITED NATIONS
HUMAN RIGHTS COUNCIL

Special Rapporteur on the promotion and protection of human rights and fundamental freedoms while countering terrorism, Ben Saul

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Global Counter-Terrorism Ninth Review – Rev.2

Key Human Rights Recommendations, 2 June 2026

1. **Omit references to non-violent "extremism"**, refer instead to "violent extremism conducive to terrorism", and refrain from expanding concepts beyond existing Global Strategy language. (In Rev.2, there are still some references to "extremism" alone.)

2. **Qualify mentions of hate speech by reference to the international legal standards** in articles 19(3) (permissible limitations on freedom of expression) and article 20(2) of the ICCPR (prohibiting "advocacy of national, racial or religious hatred that constitutes incitement to discrimination, hostility or violence") and the principles of legality, necessity, and proportionality. (In Rev. 2 "hate speech" is still used as a broad, standalone concept, and certain forms of intolerance receive selective emphasis (e.g., Islamophobia, antisemitism, Christianophobia; see PP9, O29, OP114), rather than grounding restrictions in universally applicable international legal standards.

3. **Further strengthen human rights safeguards in all provisions on digital technologies and AI**, including by reference to legality, necessity, proportionality, non-discrimination, meaningful human control, transparency and explainability, independent oversight, and effective remedies. (Rev.2 contains stronger references than Rev.1 (PP33, PP34, OP41) to compliance with human rights, including throughout the AI lifecycle, and the risks posed by AI. However, it still lacks the essential explicit safeguards as mentioned above.)

4. ***S*upport the proposed language on civil society engagement and add further language to protect civil society against reprisals** (including for engaging with the UN), intimidation, harassment, unjustified surveillance, and transnational repression. (Rev.2 positively retains existing civil society language and introduces the valuable new OP11, which calls for transparent participation mechanisms, access to information, protection of civil society, and adherence to international human rights principles.)

5. **Endorse systematic human rights due diligence assessments in counter terrorism** Member States, regional organizations, private sector actors (including beyond online platforms (OP22)), and UN technical assistance and capacity-building activities, in order to identify, prevent, and mitigate adverse human rights impacts.

6. **Add more explicit human rights safeguards and humanitarian exemptions in relation to the many paragraphs, new and existing, addressing terrorist financing and new payment technologies,** including due process, access to effective remedies, transparency, judicial safeguards, and measures to mitigate adverse impacts on humanitarian action, civil society and financial inclusion. (In Rev.2, there are many expanded references to virtual assets, cryptocurrencies, crowdfunding, and new payment systems (PP32, PP36). PP37 references the humanitarian exemption in Security Council resolution 2664, but the many financing provisions do not consistently incorporate adequate, explicit safeguards.)

7. **Strengthen PP30 by recognizing and condemning the many human rights violations committed while countering terrorism**, consistent with relevant General Assembly and Human Rights Council resolutions. (Rev.2 merely acknowledges "negative impacts".)

8. **Retain positive references to gender equality and sexual and gender-based violence throughout the text. (**Rev.2 positively preserves and strengthens gender language, including in the new OP58 on trafficking and exploitation affecting women and girls.)

9. **Further strengthen language on children's rights in line with international law**, in particular by: (i) recognizing that children associated with terrorist groups are often victims of recruitment, coercion, trafficking, exploitation and abuse; (ii) affirming that all measures should be guided by the best interests of the child; (iii) emphasizing that detention should be used only as a measure of last resort and for the shortest appropriate period of time; and (iv) strengthening references to family unity, non-discrimination, education, healthcare, psychosocial support, and safe and dignified reintegration. (Rev.2 contains positive new references to children, including protection from recruitment and exploitation (PP26), education (PP27), and rehabilitation and reintegration (OP56).)

10. **Establish an internal, independent oversight mechanism for UN Global Coordination Compact activities** (Rev.1, OP89bis) and ensure it can oversee human rights compliance, gender responsiveness, civil society engagement, transparency and accountability.

11. **In the results-based framework, incorporate more qualitative assessments of the impacts of counter-terrorism measures (including digital technologies),** including on human rights, civic space and civil society participation, gender responsiveness, prevention of violations, remedies and accountability, and balanced implementation across all four pillars of the Strategy.(The strengthened monitoring and evaluation language in OP98 and OP99 is welcome but not sufficient.)

12. **Retain the prohibition on discrimination and profiling in OP85.**

13. **Add stronger language on respect for human rights in the context of migration, refugees, asylum, and internal displacement**, including non-refoulement, family unity, due process, and judicial safeguards. (In Rev.2, OP33 retains some protection language but the text lacks essential specific safeguards.)

14. **Omit references to "behavioural insights/sciences"** given its limited empirical reliability, lack of accepted normative frameworks, and absence of attention to human rights safeguards. (PP18 still references the International Hub on Behavioural Insights.)

15. **References to information-sharing, joint threat assessments, and early warning mechanisms (OP87) must require compliance with international human rights law,** including legality, necessity, proportionality, non-discrimination, and data protection.

16. **Ensure that efforts to coordinate UN entities do not undermine dedicated human rights, gender, protection, criminal justice, and rule of law mandates of entities.**

17. **Consolidate and rationalize repetitive and inconsistent paragraphs,** including on hate speech, digital technologies, AI, terrorist financing, violent extremism, and organized crime, to improve coherence.

Contact the Special Rapporteur: hrc-sr-ct@un.org