

Module 1

**VIOLENCE
AGAINST
WOMEN
JOURNALISTS
IN SUB-
SAHARAN
AFRICA**

*Modules on Online
Violence against
Journalists in Sub-
Saharan Africa*



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MODULE 1

VIOLENCE AGAINST WOMEN JOURNALISTS IN SSA

- Online violence against women journalists not only violates the individual rights to freedom of expression, freedom of the press, the right to privacy, equality and non-discrimination, and the freedom of violence among others but also has widespread societal impacts.
- Violence against women journalists has increased rapidly in recent years, enabled by online tools, and is exacerbated for journalists with multiple intersecting identities.
- Women journalists face different forms of online violence, despite strong legal protections.
- States have both positive and negative obligations to protect women journalists, and various other actors must take urgent steps to play their part in protecting these journalists and reducing systemic online violence.

1. INTRODUCTION

Online assaults targeting women journalists pose one of the gravest contemporary threats to their safety, gender equality, and media freedom. These attacks are often vicious, coordinated, highly sexualized, and malicious, particularly targeting women belonging to religious and ethnic minorities or gender non-conforming individuals.¹ Regrettably, the various manifestations of online violence faced by women journalists with various intersecting identities are the “new frontline in journalism safety.”² There are several distinct characteristics of online violence targeting journalists:

- **Impact:** Online violence targeting women journalists³ aims to belittle and intimidate them, fostering a climate of fear and withdrawal.⁴ It further seeks to tarnish their professional credibility, undermining trust in the media. This “amounts to an attack on democratic deliberation and media freedom, encompassing the public’s right to access information, and it cannot afford to be normalised or tolerated as an inevitable aspect of online discourse, nor contemporary audience-engaged journalism.”⁵

¹ UNHRC, ‘Report of the Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression on reinforcing media freedom and the safety of journalists in the digital age’ (2022) (accessible [here](#)) at para 36 (UNSR on FreeEx Report).

² International Centre for Journalists, ‘Online Attacks on Women Journalists Leading to ‘Real World’ Violence, New Research Shows’ (2020) (accessible [here](#)).

³ For conciseness, we refer hereafter to “women”, however, this does not discount online violence perpetrated against members of the queer community, gender non-conforming persons, sexual and gender minorities, vulnerable members of society, or persons with disabilities. Where specific reference is to women, this should be read as a comment on a descriptive reality, and not be read as a prescriptive or exclusionary statement of which members of society may be victims and survivors of online violence.

⁴ UNESCO ‘The Chilling: Global trends in online violence against women journalists’ (2021) (accessible [here](#)) at 6 (The Chilling).

⁵ Id.

- **Rights implications:** The right to be free from discrimination, threats, and violence applies both off- and online. Countering online violence that targets women journalists is critical to the promotion of, among others, the rights to freedom of expression, media freedom, and privacy. It is not only limited to the digital sphere but frequently spills into physical spaces.⁶
- **Targets:** While any person can be a victim of online violence, women and those with marginalised or ‘at risk’ identities are disproportionately targeted and affected by online violence due to their gender, sexual orientation, identity, and other intersecting factors.⁷ Often targeted as a result of their gender and their work, women journalists are exposed to threatening and intimidating content which has detrimental impacts on not only their personal lives and safety but also their ability to carry out their important work.⁸
- **Digital tools and spaces:** The evolution of new digital technologies and information and communications technology (ICT) tools and services has given rise to different and more pervasive forms of online violence against journalists.⁹ These technologies have enabled coordinated attacks at a previously unprecedented scale and with anonymity that creates challenges for securing accountability for perpetrators. It is anticipated that these will continue to enable more attacks against journalists in the coming years.¹⁰
- **Various forms of harm:** Gendered online violence against women journalists is frequently perpetrated through and linked with other online harms. For example, orchestrated disinformation campaigns,¹¹ and being targeted with deepfakes to create false narratives and artificially generated or edited images to shame and undermine their credibility. Doxxing and cyber-stalking dealt with in greater detail in Module 2 in this series, are also common tools to attack journalists and inhibit reporting.
- **Prevalence:** Although violence against journalists, particularly women, is a widespread and serious issue, even existing estimates of prevalence are likely significantly undercounted. UNESCO reports that journalists, specifically women journalists, often do not lodge complaints or reports with law enforcement agencies, and even fewer pursue legal remedies, signifying the “need for improvement in legal and judicial responses to online violence against women journalists.”¹² In sub-Saharan Africa (SSA), various states have enacted legislative prohibitions against online violence impacting journalists. However, their adequacy to effectively deal with online violence has been called into question, with gendered violence posing a specific challenge.

⁶ Id.

⁷ UN Women, ‘Online and ICT-facilitated violence against women and girls during COVID-19’ (2020) (accessible [here](#)).

⁸ UNHRC, ‘Report of the Special Rapporteur on violence against women, its causes and consequences on online violence against women and girls from a human rights perspective’, 18 June 2018 (accessible [here](#)) (UNSR on VAW Online Violence Report).

⁹ Id.

¹⁰ Centre for International Governance, ‘What Is Online Gender-Based Violence?’ (2021) (accessible [here](#)).

¹¹ Id. See further, Centre for International Governance, ‘Deepfakes and Digital Harms: Emerging Technologies and Gender-Based Violence’, 27 November 2020 (accessible [here](#)).

¹² UNESCO, *The Chilling*, above n 4.

This module provides a high-level overview of this emerging trend and examines the international law framework as it relates to online violence against journalists, with a focus on the gendered impact on women journalists.

2. EMERGING TRENDS IN SUB-SAHARAN AFRICA

2.1. Sharp increases in online violence

UNESCO's 2020 global snapshot of online violence against women journalists found that of the women surveyed—

- 73% had experienced online violence in the course of their work;
- 25% had received threats of physical violence;
- 18% had been threatened with sexual violence; and
- 20% reported being attacked offline in connection with online violence they had experienced.¹³

General trends include:

- The significant increase in incidents of violence against women journalists comes in the wake of **increasing online activity** due to the COVID-19 pandemic as well as the consequences of the global rise of disinformation and the pervasive toxicity of digital platforms.¹⁴
- “Platform capture” — the **weaponisation of social media** by malicious actors, exacerbated by structural failures of the platforms' business models and design, and the increasing dependence of news organisations and journalists on these platforms.¹⁵
- Women journalists who cover **political issues** are increasingly likely to face attacks and threats online.¹⁶ When compounded with entrenched misogyny, discrimination, and hate speech, which have seeped into the online world, women journalists face ongoing threats to their safety.

These global trends are prevalent in Sub-Saharan Africa, with online harassment and violence being a source of significant fear for women journalists in the region.¹⁷ For example:

- A study of five countries in **sub-Saharan Africa** found that “organized trolling has been on the rise, especially against women with public-facing careers such as journalists, media personalities, activists and politicians.”¹⁸ Similar findings were documented in a

¹³ UNESCO 'Online violence against women journalists: a global snapshot of incidence and impacts', 2020 (accessible [here](#)). The research involved over 700 women participants from 125 countries.

¹⁴ UNESCO, *The Chilling*, above n 4.

¹⁵ *Id.*

¹⁶ UNESCO, 'Violence against journalists, the integrity of elections, and the role of public leadership: draft concept note' (2023) (accessible [here](#)).

¹⁷ Fojo Media Institute and Africa Women in Media (AWiM), *Barriers to Women Journalists*, (2020) (accessible [here](#)).

¹⁸ APC, 'Alternate realities, alternate internets: African feminist research for a feminist internet,' (2020) (accessible [here](#)) at 26.

report on eight countries in Southern Africa where women journalists, alongside politicians, are most commonly and severely targeted for online abuse.¹⁹

- In 2018, the Association of Media Women of **Kenya** (AMWIK) found that numerous Kenyan female journalists have been targeted by online smear campaigns that utilise hashtags, edited photos, and videos featuring nude imagery.²⁰ More recently, in 2022, women journalists from Kenya revealed how “one day, you could be an ordinary journalist going about your reporting duties with zeal and dedication; the next day, the internet is flooded with your private pictures and videos and abusive comments from anonymous people who don’t have a clue of who you are.”²¹
- iWatch **Ghana** likewise reports that in the second quarter of 2020, a female journalist in Ghana faced an average of 61 incidents of abuse in the reporting period, compared to a male journalist at 28, noting hateful comments related to appearance, gender, and sexuality.²²
- In **Zimbabwe**, there has been a rise of “blatant sexist and misogynistic” online attacks against women journalists.²³
- In **Tanzania**, the Executive Secretary of the Media Council has noted with concern, how the targeted and unjustified attacks of women journalists online have a “debilitating effect on journalism”.²⁴ Women journalists in Tanzania explain that they are targeted because of their gender often facing appearance-focused criticisms and objectifications.²⁵
- Recent research on online gender-based violence in **Uganda** revealed that women journalists endured multiple forms of online harassment and violence due to their work, with those reporting on political issues more likely to be targeted for online vitriol and abuse.²⁶
- **South Africa** is no different, with pervasive and persistent efforts to silence, threaten, and harass women journalists online.²⁷

¹⁹ Meta & Centre for Human Rights, ‘Understanding gender-based violence in Southern Africa,’ (2021) (accessible [here](#)).

²⁰ AMWIK, ‘Online safety for women journalists: An update of the Survey on Women Journalists in Kenya’ (2018) (accessible [here](#)).

²¹ Walusala, ‘Online Violence Against Women: In whose hands are journalists safe?’ Centre for International Media Assistance (2022) (accessible [here](#)).

²² iWatch Africa, ‘Q2 Report: Manasseh Azure, Nana Aba Anamoah & Justice Annan among most abused journalist online, Tracking digital rights in Ghana’ (2020) (accessible [here](#)).

²³ South African National Editors Forum (SANEF), ‘SANEF calls on Zimbabwe to stop online abuse of female journalists and to release journalist Hopewell Chin’ono’ (2021) (accessible [here](#)). See also, Mokwetsi, ‘How to create a safe space for women journalists in Zimbabwe’ (2021) (accessible [here](#)).

²⁴ Tech & Media Convergency (TMC), ‘A Comprehensive Analysis: Uncovering Journalistic Perspectives on Online Gender-based Violence (OGBV): Tanzania Context’ (2023) (accessible [here](#)) at viii.

²⁵ Id at 35.

²⁶ Walulya & Selns, “‘I thought You Are Beautiful’: Uganda Women Journalists’ Tales of Mob Violence on Social Media’ Digital Journalism (2023) (accessible [here](#)).

²⁷ Daniels & Skinner, ‘Cybermisogyny signals sexism in the media and newsroom’ Daily Maverick (2023) (accessible [here](#)).

- In **Namibia**, recent research confirms, that while underreported, online gender-based violence targeting female journalists is an emerging phenomenon that cuts across gender, racial, ethnic, and professional identities.²⁸

It is evident from the above that violence against women journalists forms part of a broader trend of misogyny and violence against women across the continent. That said, it is highly likely, due to underreporting and the deprioritising of online harms that the rate and impact of online violence against women journalists is far worse and remains a growing concern.²⁹

2.2. State's failures to enable media freedom

Perhaps most concerning, the UNESCO research found that not only are states struggling to respond effectively to the proliferation of online harms, but such conduct is also frequently sponsored, supported, or amplified by high-level political leaders and state-related actors.³⁰ 37% of respondents noted that political actors were the source of the attacks they faced — the second most frequently cited source.³¹ The trend of politicians orchestrating or at least tacitly encouraging attacks was similarly identified by the UNSR on VAW in her 2020 report on combatting violence against women journalists.³²

Zimbabwe's political targeting of women journalists

In recent years, Zimbabwe has been the site of government-aligned as well as political attacks against women journalists. In 2020, the South African National Editors Forum (SANEF) condemned the actions of the Press Secretary in the Office of the President of Zimbabwe and the Permanent Secretary in the Ministry of Information of Zimbabwe for their “vicious online and social media trolling of women journalists and media workers in Zimbabwe”.³³ In 2021, criticised the ruling party, ZANU-PF's, Director of Information and Publicity for using social media to intimidate and harass a female journalist.³⁴

While states have a negative obligation under international human rights law to refrain from actions that infringe on human rights, including the right to freedom of expression and the press, they also have a positive obligation to protect rights, which means taking steps to create and promote an enabling environment in which journalists can effectively play their essential role in democracy.³⁵ This means passing appropriate laws, providing protection for journalists where necessary, preventing attacks, and properly investigating and prosecuting them when they do occur.

²⁸ Zviyita & Mare, 'Same threats, different platforms? Female journalists' experiences of online gender-based violence in selected newsrooms in Namibia' Journalism (2023) (accessible [here](#)).

²⁹ CIPESA & UNESCO, 'The State of Media Freedom and Safety of Journalists in Africa' (2022) (accessible [here](#)) at 25. See also Journalism Initiative on Gender Based Violence (JiG), 'Reporting Challenges' (2021) (accessible [here](#)).

³⁰ UNESCO, The Chilling, above n 4 at 11.

³¹ Id at 14.

³² UNHRC 'Combating violence against women journalists: Report of the Special Rapporteur on violence against women, its causes and consequences', (2020) (UNSR on VAW: Combating violence against women journalists Report) (accessible [here](#)).

³³ SANEF above n 23.

³⁴ Id.

³⁵ Centre for Law and Democracy & International Media Support, 'Freedom of Expression as a Human Right' (2015) (accessible [here](#)).

For example, the 2023 Joint Declaration on Media Freedom and Democracy ([Joint Declaration](#)), issued by multiple key mandate holders in international fora,³⁶ confirms that the scope of this obligation includes a **positive obligation** to create an enabling environment for media freedom, which includes:

- adopting comprehensive measures for the safety of journalists and media workers to protect them from violence, online and physical attacks, threats and harassment, or illegitimate surveillance, while integrating gender and intersectionality perspectives; and
- taking measures to protect journalists and media outlets from strategic lawsuits against public participation (SLAPPs) and the misuse of criminal law and the judicial system to attack and silence them, including by adopting laws and policies that prevent and/or mitigate such cases and provide support to victims.³⁷

Encompassing the **negative obligation** the Joint Declaration recommends that states should:

- refrain from unduly interfering with the right to freedom of expression. In particular, states should “ensure that any restrictions on the right to freedom of expression comply with international human rights standards”;³⁸ and
- ensure that “legal frameworks should not be abused to illegitimately obstruct the work of independent media”.³⁹

The African Commission on Human and Peoples’ Rights [Declaration of Principles on Freedom of Expression and Access to Information in Africa](#) similarly provides that “the right to express oneself through the media by practising journalism shall not be subject to undue legal restrictions.”⁴⁰ In order to promote this right, states must take measures to prevent attacks on journalists and other media practitioners, including acts of intimidation or threats undertaken by State and non-State actors.⁴¹

Case note: An enabling environment without fear, intimidation, or harassment

In [Maughan v Zuma and Others](#) (2023), a South African High Court found that efforts by former President Zuma to silence female journalist Karyn Maughan by trying to have her criminally charged was tantamount to a SLAPP suit. In its reasoning, the Court reiterated that states have an obligation to ensure an enabling environment to ensure conditions in which expressive rights and vigorous public debate can thrive. This requires an environment

³⁶ UN Special Rapporteur on the Promotion and Protection of the Right to Freedom of Opinion and Expression, the Organization for Security and Co-operation in Europe (OSCE) Representative on Freedom of the Media, the Organization of American States (OAS) Special Rapporteur on Freedom of Expression and the African Commission on Human and Peoples’ Rights (ACHPR) Special Rapporteur on Freedom of Expression and Access to Information in Africa.

³⁷ Joint Declaration on Media Freedom and Democracy (2023) (accessible [here](#)).

³⁸ *Id.*

³⁹ *Id.*

⁴⁰ African Commission on Human and Peoples’ Rights, ‘Declaration of Principles on Freedom of Expression and Access to Information in Africa,’ (2019) at principle 19(1).

⁴¹ *Id.* at principle 20(2).

in which the media are able to exercise the right to freedom of expression and report freely on matters of public interest without threats and without fear, intimidation, and harassment.⁴²

Challenges to the fulfilment of the state's obligations include:

- **Lack of recognition:** There are challenges in getting lawmakers and law enforcement officials to recognise the severity and import of online harassment.⁴³ There appears to be a lack of understanding of the severity of the consequences of online harms, as well as its close relationship with offline violence. This creates a widespread sense of impunity is created which contributes to a vicious cycle of continued violence against women journalists.
- **Challenges in conflict zones:** Journalists in active conflict zones or areas experiencing crises face physical challenges and threats. In recent years, this has been exacerbated by the use of new digital tools to threaten and silence journalists, with particular risks for women journalists. In times of crisis, there is often greater sensitivity to honest and potentially critical reporting and frequent misuse of the 'national security' justification for opacity. Conflict zones place journalists, especially women journalists at risk of military attacks, police intimidation, surveillance, and GBV.⁴⁴

3. INTERNATIONAL LAW AND STANDARDS

3.1. Rights to freedom of expression and media freedom

The right to freedom of expression and media freedom are firmly grounded in international human rights law:

- The right to freedom of opinion and expression is 'gender neutral' and is enshrined under Article 19 of the UDHR and Article 19 of the International Covenant on Civil and Political Rights (ICCPR).⁴⁵
- The right to freedom of expression applies to all journalists – *of all genders* – and encompasses the right to work free from the threat of violence.⁴⁶
- Reporting freely and safely is necessary for media freedom – a free, uncensored, and unhindered press is cornerstones of a democratic society."⁴⁷

⁴² Id at para 1133.

⁴³ Media Defence, 'Cyber Rights and Wrongs: Safeguarding Human Rights Online in Kenya,' (2023) (accessible [here](#)).

⁴⁴ International Federation of Journalists, 'Women reporting conflicts: Changing the narrative, staying safe,' (2023) (accessible [here](#)).

⁴⁵ ICCPR, (1966) (accessible [here](#)). Universal Declaration of Human Rights (accessible [here](#)).

⁴⁶ UNESCO 'UN Action Plan on the Safety of Journalists' (accessible [here](#)); and UNESCO, 'Freedom of expression: A fundamental human right underpinning all civil liberties', (accessible [here](#)).

⁴⁷ UNHRC, 'General comment No. 34 on Article 19: Freedoms of opinion and expression' (2011) (accessible [here](#)).

- In 2014, UNHRC affirmed that “the same rights that people have offline must also be protected online, in particular freedom of expression.”⁴⁸

Threats against journalists undermine freedom of expression and media freedom:

- **Restrictive in nature:** Both threats of violence and actual violence, whether perpetrated online or offline against journalists, arbitrarily restrict their ability to exercise their right to freedom of expression, and “pose a very significant threat to independent and investigative journalism... and to the free flow of information to the public.”⁴⁹
- **Self-censorship:** Threats of violence against journalists and their families, as a result of their journalistic activities, ‘often deters journalists from continuing their work or encourages self-censorship, consequently depriving society of important information.’⁵⁰ Notably, some journalists opt to either deactivate their social media accounts completely or resort to using pseudonyms to continue exercising their freedom of speech and expression online.
- **Physical threats:** In worst-case scenarios, online threats of violence spill over into physical spaces, leading to physical violence or the murder of journalists. This escalation was demonstrated by the 2017 murder of Daphne Caruana Galizia, a Maltese journalist.⁵¹
- **Democratic deficit:** In addition to threats to safety, gender equality and media freedom,⁵² the various forms of online violence amount to a “direct attack on women’s visibility and their full participation in public life”, and “not only violates a woman’s right to live free from violence and to participate online but also undermines the exercise of democracy and good governance, and as such creates a democratic deficit”.⁵³

As an indicator of the gravity of threats of violence against journalists, the UNGA has, on more than one occasion, unequivocally condemned all violence against journalists and media workers, highlighted the need to prevent violence against journalists, ensure accountability through investigations into alleged threats of violence, and provide legal remedies to victims of threats, including by ensuring that perpetrators of violence are brought to justice.⁵⁴

Combating the spread of threats of violence – on- and offline – is critical given its disproportionate impact on journalists’ right to freedom of expression and the consequent impact on media freedom and democratic values.⁵⁵ Given that these rights are founded in international human rights law, there is a strong basis from which to formulate responses to the manifestations of online violence faced by journalists of all genders and with various intersecting identities.

⁴⁸ UNHRC, ‘The promotion, protection and enjoyment of human rights on the Internet’ (2014) (accessible [here](#)).

⁴⁹ IFEX, ‘Report on key issues and challenges facing freedom of expression’ (2020) (accessible [here](#)).

⁵⁰ UNGA, ‘The safety of journalists and the issue of impunity’ (2019) (accessible [here](#)).

⁵¹ UNESCO, ‘Threats to freedom of press: Violence, disinformation & censorship’ (2022) (accessible [here](#)).

⁵² UNSR on FreeEx Report above n 1 at para 36.

⁵³ UNSR on VAW: Combating violence against women journalists Report above n 32 at para 33.

⁵⁴ UNGA, ‘The safety of journalists and the issue of impunity’ (2019) (accessible [here](#)); and UNGA, ‘The safety of journalists and the issue of impunity’ (2014) (accessible [here](#)).

⁵⁵ UNHRC, ‘The promotion, protection and enjoyment of human rights on the Internet’ above n 48.

3.2. Multilayered rights implications

In addition to the impact on expressive rights and democratic values, online violence against women journalists has multilayered rights implications, impacting among others:

- **Free from violence:** The CEDAW Committee has reaffirmed the interlinkage of women's right to a life free from gender-based violence as "indivisible from and interdependent on other human rights, including the rights to... freedom of expression."⁵⁶ This applies to technology-mediated environments, such as the Internet and digital spaces.⁵⁷ The CEDAW Committee, which oversees States' compliance with the Convention, defines GBV against women as "violence that is directed against a woman because she is a woman or that affects women disproportionately. It includes acts that inflict physical, mental, or sexual harm or suffering, threats of such acts, coercion and other deprivations of liberty."⁵⁸ Online threats of violence against women journalists are captured in this definition, as they amount to harmful practices and crimes against journalists' which constitute forms of gender-based violence against women.⁵⁹
- **Equality:** The gendered nature of online attacks against women journalists – because they are women – impacts their rights to equality and non-discrimination. The gendered consequences and harm inflicted by various forms of online violence are rooted in structural inequality, discrimination, and patriarchal norms.⁶⁰ Multiple international human rights law instruments provide for the right to equality and non-discrimination, including the UDHR, (Article 2), the Convention on the Elimination of All Forms of Discrimination against Women, the International Covenant on Economic, Social and Cultural Rights (article 20, International Covenant on Civil and Political Rights (Article 2).
- **Privacy:** Article 12 of the UDHR, and Article 17 of the ICCPR provide for the right to privacy. Numerous forms of online violence infringe the privacy rights of women journalists. For instance, the dissemination of intimate photographs or doctored images online without consent amounts to a privacy violation. Doxxing, the malicious publication of private information like contact details, breaches privacy rights and exposes women journalists to harassment. Online stalking unwanted messages and surveillance tactics further, encroach upon their privacy rights.⁶¹

3.3. Regional Standards

At the regional level, various and intersecting rights are protected:

⁵⁶ Id at 95.

⁵⁷ CEDAW, 'General recommendation No. 35 on gender-based violence against women, updating general recommendation No. 19 (1992)' (2019) (accessible [here](#)).

⁵⁸ Id.

⁵⁹ Id.

⁶⁰ UNSR on VAW Online Violence Report above n 8.

⁶¹ Id.

- The rights to freedom of expression of the press are protected and promoted for all African peoples', irrespective of sex, under article 9 of the African Charter on Human and Peoples' Rights ([African Charter](#)).
- The Africa Charter further provides for the rights to non-discrimination (article 2), equality (article 3), dignity (article 5), and the obligation to ensure the elimination of discrimination against women (article 18(3)).
- The [Maputo Protocol](#), signed by 44 African states, provides strong protections against gender-based discrimination, harassment, and violence.

Case note: Egyptian Initiative for Personal Rights v Egypt

The case of [Egyptian Initiative for Personal Rights v Egypt](#) (2011) brought before the African Commission on Human and People's Rights (**ACHPR**) illustrates the interplay of the rights to freedom of expression and discrimination and inequality.⁶²

The case centred around electoral reform protests in 2005 during which journalists who were protesting and those reporting on the demonstration were assaulted by riot police. In their complaint to the ACHPR, the complaints argued that the main reasons they were assaulted were because they "hold particular political views, are women and journalists".⁶³ In finding violations of the rights to non-discrimination, equality, and freedom of expression, among others, the ACHPR found the "violations were designed to silence women who were participating in the demonstration and deter their activism in the political affairs".⁶⁴

The case has been welcomed as an important decision that recognises gender discrimination and gender-based violence in the content of expression and media freedom.⁶⁵

There is also a body of non-binding commentary on threats of violence and the impact on journalists' right to freedom of expression and press freedom. For example:

- The ACHPR issued Resolution 185 on the [Safety of Journalists and Media Practitioners in Africa](#) in 2020. It clearly identifies the correlation between the "enjoyment of freedom of expression, press freedom, and access to information" and "freedom from intimidation, pressure and coercion" for media practitioners and journalists.
- The ACHPR Declaration of Principles on Freedom of Expression and Access to Information in Africa ([African Declaration](#)) has also affirmed that the "exercise of the rights to freedom of expression and access to information shall be protected from

⁶² [Egyptian Initiative for Personal Rights and Interights v Egypt](#) 323/06 (2011) (accessible [here](#)).

⁶³ *Id* at para 77.

⁶⁴ *Id* at para 166.

⁶⁵ See LSE Centre for Women, Peace and Security, 'EIPR and Interights v. Egypt' (accessible [here](#)) and Global Freedom of Expression, 'Egyptian Initiative for Personal Rights v. Egypt' (accessible [here](#)) for the case summary and analysis.

interference both online and offline...” Principle 20 deals at length with the safety of journalists and other media practitioners, including by stating that states must take measures to ensure the safety of female journalists and media practitioners by addressing gender-specific safety concerns, including sexual and gender-based violence, intimidation and harassment.

- In 2022, the ACHPR passed an important **Resolution on the Protection of Women Against Digital Violence in Africa**. The Resolution calls on states to review or adopt legislation companies of digital violence and expands the definition of gender-based violence to include digital violence against women. In relation to journalists, the Resolution calls on states to:
 - Undertake measures to safeguard women journalists from digital violence, including gender-sensitive media literacy and digital security training; and
 - Repeal vague and overly wide laws on surveillance as they contribute to the existing vulnerability of female journalists.⁶⁶

The African Declaration on Internet Rights and Freedoms (**ADIRF**), a Pan-African civil society initiative, has emphasised the need to safeguard journalists from attacks, asserting that assaults on individuals involved in journalistic activities infringe upon the right to freedom of expression, and advocates for the establishment of protective guidelines for those who gather and share information, including journalists, women's rights activists, and human rights defenders, to ensure their safety.

Other regions have also developed significant guidelines, resolutions, and standards for the protection of journalism that can serve as guidance for future progress in SSA:

- In **Europe**, the Council of Europe's Committee of Ministers has noted that threats of violence against journalists serve as indicators of broader threats to freedom of expression, signalling a deterioration in human rights, democracy, and the rule of law.⁶⁷ Emphasising the need for effective interim protection measures for those facing such threats, the Committee underscores that ensuring the right to freedom of expression without fear necessitates guaranteeing safety, security, and practical protection, particularly for journalists and media professionals. It also noted that threats of violence frequently target female journalists, highlighting the need for “gender-specific responses” to these gendered threats of violence.
- the General Assembly of the **Organisation of American States** adopted resolution 2908 (XLVII-O/17) on the right to freedom of thought and expression and the safety of journalists and media workers in 2017 which stressed that “journalism must be practised free from threats, physical or psychological aggression, or other acts of intimidation.”⁶⁸

⁶⁶ Id at paras 8 and 9.

⁶⁷ Council of Europe ‘Recommendation CM/Rec(2016) 4 of the Committee of Ministers to member States on the protection of journalism and safety of journalists and other media actors’, 13 April 2016 (accessible [here](#)).

⁶⁸ OAS, ‘Promotion and Protection of Human Rights’ (accessible [here](#)).

- Concerns of threats of violence against journalists have also been raised before **courts** across the globe.⁶⁹

4. THREATS OF VIOLENCE

- **Definition:** A ‘threat of violence’ is defined as an expression or a declaration of an “intention to inflict emotional, physical or psychological harm, injury, pain or damage’ to another person, through virtual or physical means.”⁷⁰ Women journalists bear a disproportionate burden of these threats and attacks, especially those occurring online.⁷¹
- **Rights implications:** As in the offline context, threats of online violence against journalists under international law are not tolerated given their ability to infringe on human rights, particularly the rights to freedom of expression and press freedom. In 2015, the OSCE Representative on Freedom of the Media issued recommendations on countering online abuse of female journalists and recognised that ‘threats and other forms of online abuse of female journalists and media actors is a direct attack on freedom of expression and freedom of the media.’⁷²
- **Platforms and sites:** Notably, threats of violence against journalists are typically issued or transmitted through major social media platforms, such as Twitter and Facebook, or through messaging applications or other platforms or technologies, including WhatsApp and Telegram. Additionally, threats directed towards journalists are also frequently posted in the comment sections provided by media houses or news outlets on their official websites or official social media pages.⁷³
- **States obligations:** As mentioned above, international human rights law places obligations on States to create conditions for effective investigation, prosecution, and protection in response to threats of violence against journalists. Further, international human rights law defines the responsibilities of private sector actors, including businesses and corporations, such as private social media companies and intermediaries, where threats of online violence against journalists are typically transmitted.

States and Platforms

The UN Guiding Principles on Business and Human Rights (UNGPs), a widely accepted non-binding global standard defining the responsibilities of businesses to protect and advance human rights, calls on private sector actors to fulfil their positive responsibilities to

⁶⁹ For more case law regarding threats of violence affecting journalists in jurisdictions including Australia, Finland, France, Singapore, amongst others, see: The Law Library of Congress, ‘Laws protecting journalists from online harassment,’ September 2019 (accessible [here](#)). For other online harassment cases, see: Pen America, ‘Online Harassment Case Studies’ (accessible [here](#)).

⁷⁰ Collins Dictionary, ‘threat of violence,’ (accessible [here](#)) and Reverso Dictionary (accessible [here](#)).

⁷¹ United Nations ‘International Day to End Impunity for Crimes against Journalists’ (accessible [here](#)).

⁷² Organization for Security and Cooperation in Europe, ‘Recommendations following the Expert Meeting New Challenges to Freedom of Expression: Countering Online Abuse of Female Journalists’, (accessible [here](#)).

⁷³ See UNESCO, The Chilling above n 4.

mitigate human rights impacts of their operations, publish transparency reports and provide remedies for potential human rights violations.⁷⁴ More recently, and with a focus on women journalists, the UNSR on FreeEx noted the dual responsibility of states and the private sector:

“The ultimate responsibility rests with States, as the primary duty bearers of human rights, to ensure that women journalists are safe from online violence. As the main vectors of online attacks, social media companies are also responsible for exercising due diligence and taking measures to ensure the safety of journalists on their platforms in accordance with the Guiding Principles on Business and Human Rights.”⁷⁵

In the SSA region, observed threats of online violence include threats of sexual or physical violence, including rape or death threats, and threats of digital security attacks (e.g., hacking or trolling), amongst others. For example:

- SANEF and partners observed that “online threats targeting journalists such as hate speech, harassment, and doxing” were received from the police, political parties, and the public in **South Africa**.⁷⁶ Concerningly, these threats of violence targeting journalists also extend towards their family members, leading to wider concerns about online and physical safety and security.
- iWatch Africa reports that journalists who report on contested social and political issues in **Ghana** are subjected to online violence including threats of physical violence and rape.⁷⁷

Finally, it should be noted that there is a fine line, in reality, between a threat and actual violence in the online sphere, but that the legal requirements for proving such actions are likely to differ. For example, a threat of violence accompanied by the release of personal information, doxxing, can be seen as both an act of actual violence through the tangible and real-world harm that results from doxxing, as well as a threat for further violence to be perpetrated through the release of the information (e.g. a threat to show up at one’s house).

5. TYPES OF VIOLENCE

While the manifestations of online violence against women journalists vary widely, some commonly accepted types have developed over time that assist in understanding the breadth of experiences faced by women journalists as well as how regulation and enforcement can better address these harms. These types are discussed in more detail in **Module 2 of this**

⁷⁴ UN Guiding Principles on Business and Human Rights (accessible [here](#)).

⁷⁵ UNSR on FreeEx above n 1 at para 39.

⁷⁶ Amnesty International South Africa, Campaign for Free Expression, Committee to Protect Journalists, Media Monitoring Africa, and the South African National Editors’ Forum, ‘Submission for the 41st Session of the Universal Periodic Review Working Group’ (2022) (accessible [here](#)).

⁷⁷ iWatch Africa, ‘Q2 Report: Manasseh Azure, Nana Aba Anamoah & Justice Annan among most abused journalist online, Tracking digital rights in Ghana’ (2020) (accessible [here](#)).

series on Digital security attacks and Online Gender-Based Violence (OGBV). In summary, these include, but are not limited to:

- Cyber-harassment;
- Doxxing;
- Stalking;
- Non-consensual dissemination of intimate images;
- Online sexual exploitation and abuse;
- Dis- and misinformation campaigns;
- Privacy and data protection violations;
- Denial of Service (DoS) and Distributed Denial of Service (DDoS) attacks
- Government surveillance;
- Commercial surveillance;
- Phishing; and
- Confiscation of hardware.

It should be noted that, in contrast to offline gender-based violence, OGBV is characterised by continuity due to the ability of perpetrators to utilise different online and offline platforms to transmit harmful speech or behaviour for extended periods, leading to the “constant re-victimisation of victims.”⁷⁸ This issue of re-victimisation is further entrenched by the reality that any form of targeted online violence creates a “permanent digital record that can be distributed worldwide and cannot be easily deleted.”⁷⁹

6. IMPACT OF ONLINE VIOLENCE ON THE WORK OF JOURNALISTS

6.1. Psychological harm

According to the UNESCO report, at least 26% of the women journalists interviewed had suffered impairment to their mental health as a result of online violence.⁸⁰ Out of these, only 12% had sought medical help. In Africa, psychological harm is one of the most devastating effects of online violence against journalists. UNESCO also emphasised that these experiences are not limited to the short-term, often causing long-lasting physical and psychological stress. A study conducted by ARTICLE 19 and AMWIK in **Kenya** also documented the psychological harm experienced by journalists who were victims of online violence.⁸¹

6.2. Spill-over of online violence to offline spaces

There is a close relationship between online and offline violence, with online threats or abuse frequently being followed up with offline violence and vice versa. For example:

⁷⁸ World Wide Web Foundation, ‘Covid-19 and increasing domestic violence against women: The pandemic of online gender-based violence’, July 2020 (accessible [here](#)).

⁷⁹ UNSR on VAW Online Violence Report above n 8.

⁸⁰ UNESCO, The Chilling, above n 4 at 13.

⁸¹ ARTICLE 19 & AMWIK, ‘Women Journalists Digital Security’, February 2018 (accessible [here](#)).

- **Doxxing** is often committed with the express intent of enabling offline harassment of the targeted person.
- **Online stalking** is frequently accompanied by other, offline methods of stalking.
- **NCII** and other forms of harassment are designed to generate violations of dignity and undermine one's credibility and professional standing in the real world.
- In 2017, the Committee to Protect Journalists stated that at least 40% of the journalists who were murdered had received **death threats**, including online threats prior to their death.⁸²
- In **Ghana**, journalists from the Multimedia Group received direct threats of physical harm via social media for their work around the 2020 elections.⁸³
- In 2017, an online message calling for the killing of certain identified journalists was circulated across social media platforms in **Togo** accompanied by the dissemination of personal data, ostensibly to support the government regime.⁸⁴

Case note: Litigating violence against journalists in Africa

In *South African National Editors Forum v. Black First Land First* (2017) the High Court of South Africa granted several orders relating to the protection of journalists from harassment. The case related to attacks that had been made both on- and offline against journalists who had reported negatively on an organisation, Black First Land First (BLF).

The Court held that the journalists had a right to the protection of their physical and human dignity and to carry out their profession, and that in making threats and sending abuse to the journalists online, gathering in front of their homes, and turning off the water supply to the house, the members of BLF had intended to harass, intimidate, and threaten the journalists and violated their right to the protection of their bodily and physical integrity, to dignity, and to follow the profession of their choice.

Importantly, the Court also ordered the Respondents not to use social media in an intimidating and threatening way.

6.3. Loss of credibility

Online harassment and abuse of journalists and media houses can have severe effects on their credibility, casting doubt on their independence and impartiality to their audience and leading to a general climate of loss of trust in the media, with devastating effects on democracy and the free flow of information. For example:

- In **Nigeria**, journalist Ruona Meyer was attacked by online trolls for publishing an exposé on the abuse of codeine and those profiting from the trade.⁸⁵ Due to her marriage to a

⁸² Elisabeth Witchel, 'Getting away with Murder: CPJs 2017 Global Impunity Index spotlights countries where journalists are slain and the killers go free', 31 October 2017 (accessible [here](#)).

⁸³ Media Foundation for West Africa, 'Journalists receive threats via social media in the aftermath of early December general election', 2020 (accessible [here](#)).

⁸⁴ Reporters Without Borders, 'Online Harassment of Journalists; Attack of the Trolls' (accessible [here](#)).

⁸⁵ BBC, 'Africa Eye: How a codeine investigation changed Nigeria', 6 June 2019 (accessible [here](#)).

German national and association with the BBC, she was tagged as a foreign agent and her work was a result of foreign interference.⁸⁶

- In **Kenya**, the Nation Media Group was in 2019 harassed by online trolls and dubbed *#NationMediaGarbage*, a tag designed to attack the credibility of the organisation.⁸⁷ Likewise in Kenya, the term 'Githeri Media' is used to rubbish the work of journalists and media houses and to imply state or political influence on news.⁸⁸ Further, research⁸⁹ has demonstrated that the Kenyan Government actively used misinformation and coordinated inauthentic campaigns on social media to discredit the 'Pandora Papers'.⁹⁰
- UNESCO's research on the widespread attacks faced by **Filipino-American journalist**, Maria Ressa, co-winner of the 2021 Nobel Peace Prize for her work to safeguard freedom of expression, revealed that 60% of the attacks were designed to undermine her professional credibility and public trust in her journalism.⁹¹

The above examples illustrate how perpetrators frequently abuse the public's recognition of widespread mis- and disinformation to invoke false claims of a journalist's work being "fake news." Orchestrated attacks by armies of trolls or supporters are also often used to create substantial dents in the perceived credibility of a journalist.

6.4. Culture of violence

Failure by different stakeholders to address online violence leads to a culture of impunity in which perpetrators of online violence escape without consequences, with limited response from platforms, the state, and media houses, leading to ongoing and repeated cycles of violence that, over time, can develop into an accepted culture of violence against women and/or journalists.

Of the journalist killings documented between September 2013 and August 2023, in 78% (204 cases) no one had been held accountable, according to an analysis by the Committee to Protect Journalists.⁹² Securing accountability for online attacks is also challenging due to a range of factors:

- The difficulties in holding private digital platforms, which do not have a physical presence in most African countries and determine their own content moderation standards separate and distinct from domestic laws, accountable for removing content in languages and contexts in which they have little expertise;
- The lack of awareness among law enforcement of the severity and impacts of online abuse against women journalists;

⁸⁶ UNESCO, *The Chilling*, above n 4.

⁸⁷ Reporters Without Borders, '2020 RSF Index: Future of African Journalism under threat from all sides' (accessible [here](#)).

⁸⁸ Twitter, Larry Madowo (accessible [here](#)).

⁸⁹ Madung & Obilo, 'How to manipulate Twitter and Influence People: Propaganda and the Pandora Papers in Kenya', 3 November 2021, (accessed [here](#)).

⁹⁰ The largest investigation in journalism history exposes a shadow of financial system that benefits the world's most powerful and rich. See: ICIJ, 'Pandora Papers' (accessible [here](#)).

⁹¹ UNESCO, *The Chilling*, above n 4 at 48.

⁹² VOA, 'Impunity in Journalist Killings Remains the Norm, Report Says,' (2023) (accessible [here](#)).

- A dearth of appropriate legislation and regulations dealing specifically with online violence against journalists, particularly women;
- Challenges in identifying and tracking down perpetrators who often operate anonymously online; and
- Unsupportive state apparatuses that are often complicit in enabling attacks against journalists and actively seeking to undermine freedom of expression and of the press for various reasons.

In addition, and because of the above, there is a need for media houses and employers of women journalists to play a more active role in supporting and protecting journalists from these attacks. Concerningly, in a global survey released by the International Federation of Journalists, two-thirds of the respondents stated that online harassment was not a priority for their media company while 44% stated that the issue was not even discussed.⁹³

One **Kenyan** journalist states:

“We are harassed in the online space by perpetrators who get away without any consequences. There are no adequate measures to protect us against such harassment: Our media organisations do not know how to act when we are facing these attacks online, and our legal protections, which look very promising on paper, are not implemented. The big question then is, in whose hands are journalists safe?”⁹⁴

Perpetrators of online violence associated with the state contribute to this culture of violence as it creates the impression that such conduct is permissible. In **Rwanda**, people with access to the President’s Twitter account were linked to harassment and trolling against journalist Sonia Rolley.⁹⁵

Case note: Accountability for failure to investigate – *Hydara v Gambia*

In the foundational case of *Hydara v Gambia* (2014) in the ECOWAS Court, the Court held that the state’s failure to effectively investigate the assassination of a prominent Gambian journalist allowed impunity and violated the right to freedom of expression, as well as failing to provide redress to his family. In its judgment, the Court emphasised the obligations of the state to protect media practitioners, including those critical of the state, and to enable a safe and conducive atmosphere for the practice of journalism to avoid the chilling effect that systematic impunity had on journalism and the right to freedom of expression.

6.5. Self-Censorship

⁹³ International Federation of Journalists, ‘Time to end Media inaction over online abuse, says IFJ’ (2022) (accessible [here](#)).

⁹⁴ Lourdes Walusala, ‘Online Violence against women: In whose hands are journalists safe?’ (2022) (accessible [here](#)).

⁹⁵ Reporters Without Borders, ‘Online Harassment of Journalists; Attack of the Trolls’ (accessible [here](#)).

Online violence against journalists causes self-censorship as a protective mechanism, with journalists seeking to avoid reporting on topics that appear sensitive and that could lead to online violence, or ultimately to withdraw from journalism entirely. For example:

- In **Kenya**, ARTICLE 19 found that online violence has caused female journalists to withdraw from the use of the internet and stop working for some time.⁹⁶
- In **Namibia** the occurrence of online gender-based violence against female journalists in Namibia has led some to resort to self-censorship out of fear of retaliation.⁹⁷

The **impact** of self-censorship and withdrawal is profound:

- Withdrawing and self-censorship implicate freedom of expression and press freedom but also exacerbate the pre-existing inequalities regarding participation levels between men and women journalists as professional counterparts.
- Further, the withdrawal of large numbers of women journalists from online spaces as well as from the industry as a whole creates serious concerns for representation and diversity of perspectives within the media, with potentially serious economic, social, and political consequences.
- As stated by UN Women, limiting the participation of women online “is a significant concern given the majority of the estimated 2.9 billion people who remain unconnected to the Internet are women and girls.”⁹⁸

7. RELEVANCE TO PRESS FREEDOM AND FREEDOM OF EXPRESSION

In addition to the individual-level effects detailed above, which constitute serious infringements of the right to freedom of expression of individual journalists.

- **Media freedom:** UNESCO’s research shows that journalists are attacked more frequently when their journalistic activities focus on the themes of gender, politics, elections, human rights, and social policy.⁹⁹
- **Access to information:** Online violence is likely to have the most detrimental chilling effect on serious reporting that informs citizens and the public about important social, economic, and political issues. The consequences are, therefore, not limited to individual journalists or even the profession as a whole but extend to the ability of the public to be informed about critical public issues.
- **Political actors:** It is also notable that politicians and political party officials or associated persons are some of the key instigators and amplifiers of online violence

⁹⁶ ARTICLE19 & AMWIK, ‘Women Journalists Digital Security’, February 2016 (accessible [here](#)).

⁹⁷ Zviyita & Mare above n 28.

⁹⁸ UN Women, ‘FAQs: Trolling, stalking, doxing and other forms of violence against women in the digital age,’ (accessible [here](#)).

⁹⁹ UNESCO, The Chilling, above n 4 at 13.

against women journalists.¹⁰⁰ Attacks against journalists are frequently used as a political tool, with levels of violence increasing around election times and other periods of political contestation.

- **Impact on democracy:** Online violence has significant implications for the free flow of information in democratic systems and during elections. In 2021, Pollicy noted that during **Uganda's** 2021 general election, online violence was used to harass women in politics and to reinforce existing patterns of power and dominance against women, limiting their civic participation. The report also states that whereas both men and women in politics used online tools for engagement, "greater online activity was linked with higher levels of online violence for women as opposed to men."¹⁰¹

Case note: Litigating violence against journalists: state obligations to prevent violence

In *Dávila v. National Electoral Council* (2023), the Constitutional Court of Columbia issued a ruling in a case brought by a group of women journalists seeking to vindicate their constitutional rights against the National Electoral Council of Colombia, arguing that they had suffered misogynistic and sexist online violence on Twitter that had sought to censor them and demean their profession and that the Council had failed to adopt measures to prevent or sanction sexist violence perpetuated or tolerated by members and affiliates of political parties in their social networks.

The Court held that "there is an evident pattern of online violence against women journalists as a result of their reporting on the activities of political figures in the public interest" and ordered a series of transformative measures to prevent, investigate, and punish such behaviour. These measures called for included, amongst others, the implementation of ethical guidelines by political parties to sanction online violence and the enacting of legislation targeting sexist digital violence.

8. INTERSECTIONAL TARGETING OF MARGINALISED JOURNALISTS

- **Intersectionality:** The individuals most affected by gender-based violence and inequality are often those who are already marginalized and disadvantaged: black and brown women, indigenous women, women residing in rural areas, young girls, girls with disabilities, as well as transgender and gender non-conforming youth.¹⁰² The UNSR on VAW reiterates that this intersectional discrimination arises due to the combination of, and interplay between, multiple characteristics and identities noting that those from marginalized groups are especially vulnerable targets of online violence.¹⁰³

¹⁰⁰ Id at 17.

¹⁰¹ Pollicy, 'Amplified Abuse; Report on Online Violence against women in the 2021 Uganda General election', (2021) (accessible [here](#)).

¹⁰² UN Women, 'From where I stand: "Just the act of wearing our traditional clothes is an expression of resistance"' (2019) (accessible [here](#)).

¹⁰³ UNSR on VAW Online Violence Report above n 8.

- **Journalists:** Journalists experience also intersectional discrimination and gender-based targeting based on several defining characteristics. These include, but are not limited to, “race, ethnicity, caste, culture, religion, sexual orientation, gender identity and expression, abilities, age, geographic location (urban/rural setting), social, economic and legal status, class, income, minority affiliation, amongst others.”¹⁰⁴
- **Africa:** African culture has been criticised for promoting heteronormativity which entrenches homophobia and discrimination of sexual minorities.¹⁰⁵ It is common for same-sex relations to be considered ‘un-African,’ and many countries continue to criminalise homosexuality. This propagates a culture of violence against members of the LGBTQI+ community that extends into the online world. Even in countries where decriminalisation has been achieved, substantial barriers remain to ensuring equal treatment and participation for LGBTQI+ individuals and groups:
 - In **South Africa**, for example, despite a progressive constitution providing for equality and non-discrimination, heteronormative culture continues to perpetuate homophobic violence.¹⁰⁶
 - In **Angola**, despite the decriminalisation of same-sex conduct, sexual minorities are still subjected to online violence.¹⁰⁷
- **Gender identity and sexual orientation:** Identity and sexuality are common vectors along which attacks against journalists are directed and can exacerbate violence against women with intersecting identities. UNESCO’s research has likewise found that “women journalists who are also disadvantaged by racism, homophobia, religious bigotry, and other forms of discrimination face additional exposure to online attacks, with worse impacts.”¹⁰⁸ In particular, many attacks are deeply racialised and leverage structural racism to amplify the effect on the target.

Enhancing the safety of all women journalists using an intersectional gender approach

In 2022, ARTICLE 19 released three guidelines for the enhancement of safety for all women journalists relying on an intersectional gender approach. These include:

1. **Guideline 1:** Monitoring and documenting attacks against journalists and social communicators;
2. **Guideline 2:** Advocating on emblematic cases for change; and
3. **Guideline 3:** Organising protection training.

These guidelines offer novel insights for actors, using a gendered intersectional approach, to understand how other intersectional characteristics “influence, and thus

¹⁰⁴ UNSR on VAW: Combating violence against women journalists Report above n 32.

¹⁰⁵ Mkhize & others, ‘Unpacking pervasive heteronormativity in sub-Saharan Africa: Opportunities to embrace multiplicity of sexualities,’ *Progress in Human Geography* 47(3) (2023) (accessible [here](#)).

¹⁰⁶ Reygan & Lynette, ‘Heteronormativity, homophobia and ‘culture’ arguments in KwaZulu-Natal, South Africa’ (2014) (accessible [here](#)).

¹⁰⁷ Meta & Centre for Human Rights above n 19.

¹⁰⁸ UNESCO above n 3 at 16.

exacerbate, violations of journalists' and social communicators' right to freedom of expression."¹⁰⁹

9. CONCLUSION

In addition to having severe effects on freedom of expression and of the press, online violence against women journalists impacts a wide range of human rights that are protected and promoted in international human rights law. Online violence, irrespective of the form or manifestation, is a targeted attack on journalists' rights and freedoms, with the intention of intimidating, silencing, and stigmatising journalists. It systematically targets women and those with intersecting identities including race, gender identity, and sexual orientation and is resulting in the systematic suppression of women's voices from online spaces and from the media, leading to serious concerns for representation, equality, and democratic participation. More action is needed by a range of actors, including the platforms, states, regional bodies, and media houses, to protect women journalists in online spaces and to counter the growing tide of online abuse that poses a serious risk to the advancement of the right to freedom of expression in the digital era.

¹⁰⁹ ARTICLE 19 'Guide 1: An intersectional gender guide to monitoring and documenting attacks against journalists and social communicators', April 2022 (accessible [here](#)).