

**Mandates of the Special Rapporteur on the promotion and protection of human rights and fundamental freedoms while countering terrorism; the Working Group on Arbitrary Detention; the Special Rapporteur on the right to education; the Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression; the Special Rapporteur on the rights to freedom of peaceful assembly and of association; the Special Rapporteur on the right to privacy; the Special Rapporteur on freedom of religion or belief and the Working Group on discrimination against women and girls**

Ref.: AL TUR 9/2025  
(Please use this reference in your reply)

8 October 2025

Excellency,

We have the honour to address you in our capacities as Special Rapporteur on the promotion and protection of human rights and fundamental freedoms while countering terrorism; Working Group on Arbitrary Detention; Special Rapporteur on the right to education; Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression; Special Rapporteur on the rights to freedom of peaceful assembly and of association; Special Rapporteur on the right to privacy; Special Rapporteur on freedom of religion or belief and Working Group on discrimination against women and girls, pursuant to Human Rights Council resolutions 58/14, 51/8, 53/7, 52/9, 59/4, 55/3, 58/5 and 59/14.

In this context, we would like to bring to the attention of your Excellency's Government information we have received concerning **two coordinated counter-terrorism operations conducted on 7 May 2024 and 6 May 2025, resulting in the arrests of 55 and 208 individuals respectively, mostly women, students, and young people**. These operations appear to reflect a broader pattern of unjustifiably criminalising the otherwise lawful activities of children, students, and individuals with alleged familial or social links to the Gülen (Hizmet) movement.

The treatment of these individuals, as well as the reported procedural and material conditions of their detention, raise serious concerns regarding Türkiye's compliance with its obligations under international human rights law.

We remind your Excellency's Government that concerns regarding the alleged persecution of actual and suspected persons affiliated with the Gülen Movement were raised by several Special Procedures mandate holders in the following communications: TUR 7/2024; TUR 5/2024, TUR 13/2021, TUR 20/2020, TUR 5/2020, TUR 10/2019, TUR 6/2019, TUR 2/2019, TUR 6/2018, TUR 7/2018, TUR 5/2018, TUR 1/2018, TUR 7/2017, TUR 6/2017, TUR 5/2017 and TUR 4/2017. We note that in the Government's reply, it reaffirmed its commitment to human rights and international cooperation and emphasized its legitimate right to prosecute individuals genuinely implicated in coup-related violence. However, in light of the information we continue to persistently receive, we must reiterate our concerns relating to the misuse of counter-terrorism laws against individuals suspected of affiliation with the Gülen Movement in relation to legitimate conduct that does not contribute to terrorist violence.

According to the information received:

### ***Events preceding the 7 May 2024 raids***

On 19 December 2023, the police launched a terrorism investigation targeting 17 individuals – primarily female university students – based on secret information allegedly provided by “reliable sources.” Despite the absence of concrete evidence or specific suspicions, on 18 January 2024 the Criminal Judgeship of Peace authorised wiretapping and physical surveillance of the students, their families, and their homes at the request of the prosecutor’s office. On 31 January 2024, invoking “a case where delay is prejudicial,” the prosecutor ordered the wiretapping of a 16-year-old girl on allegations of membership in an armed terrorist organisation. The following day, on 1 February 2024, the Criminal Judgeship of Peace authorised her physical surveillance on the same charges. On 25 February 2024, the police sought authorisation to wiretap and physically surveil a 12-year-old girl under similar allegations and circumstances. On 29 April 2024, it was alleged that 117 individuals suspected of “acts of terrorism” had been identified through the surveillance activities, including students’ movements in and out of their residences and their lawful meetings, which were classified as terrorist conduct. On 6 May 2024, the prosecutor ordered the detention of an other 16-year-old girl and the compulsory police summons of 16 children aged between 12 and 17 on charges of membership of a terrorist organisation. On the same day, an order was issued for the detention of 38 individuals, the majority of whom were female university students.

### ***7 May 2024 raid***

On 7 May 2024, acting on instructions from the Istanbul Chief Public Prosecutor’s Office, the Istanbul Police Department’s Anti-Smuggling Division launched a coordinated counter-terrorism operation resulting in the detention of 40 individuals – primarily women and university students – and the simultaneous apprehension of 15 minors by the Child Protection Branch. The minors, aged between 13 and 17, were reportedly the children of several adult detainees. Although the operation was officially described as an “information gathering” exercise, the minors were apprehended during pre-dawn raids, removed from their homes, transported in handcuffs, and subjected to forensic medical examinations.

While in custody, the children were allegedly registered and treated as criminal suspects. They were verbally threatened and questioned using information derived from technical surveillance. They were denied access to legal counsel and family members throughout the process, with relatives reportedly notified only after the fact and prohibited from delivering food. The minors were allegedly addressed with degrading language and left without food for extended periods. Although social services personnel – who are legally mandated to ensure the protection of minors – were present, they reportedly failed to intervene, and in some instances, they attended multiple interrogations simultaneously, raising serious procedural concerns. The children were reportedly compelled to sign documents in their capacity as criminal suspects.

The adult detainees were kept in custody for four days and experienced similar conditions of detention, including deprivation of food, psychological pressure, physical torture, and restriction of communication with the outside world or other detainees.

On 10 May 2024, the prosecutor referred 33 adult detainees to the Criminal Judgeship of Peace with a request for their arrest. Twenty-eight individuals, including university students and relatives of minors, were remanded in custody on terrorism charges including “membership in an armed terrorist organisation”. The charges were based on seemingly ordinary behaviour, such as voluntarily providing English and religious lessons to middle and high school students and organising social activities, all of which were characterised as terror-related activity.

Among those arrested, 10 were university students aged between 19 and 25 years, who were in the middle of their exams. Additionally, the mothers and sisters of some of the children, as well as individuals with serious health conditions, were arrested.

On 14 May 2024, two detained minors, aged 16 and 17, publicly described the conditions of their arrest and treatment in custody. A criminal complaint was subsequently filed by the mother, Aysu Öztaş Bayram, concerning the alleged torture of her daughters, aged 16 and 17, but as of the date of this communication, no action has been taken by the Public Prosecutor’s Office.

On 10 June 2024, the prosecution filed a 529-page indictment which presented no material evidence implicating the accused in violent acts or formal terrorist organisational membership. Instead, the indictment relied on participation in voluntary tutoring and lawful social activities, characterising this as criminal conduct. The lawful activities of legal professionals were also cited as purported evidence of criminal intent. On 8 July 2024, the Istanbul 24th High Criminal Court issued its preliminary proceedings report and scheduled the trial to be held between 23 and 27 September 2024. The court further ordered that 15 children be brought in by police to testify against their parents, despite objections from legal counsel, raising further concerns about coercion and procedural impropriety. The first hearing before the Istanbul 24th High Criminal Court took place on 23 September 2024.

### ***6 May 2025 raid***

On 6 May 2025, a large-scale coordinated operation was carried out across 47 provinces in Türkiye under the direction of the Gaziantep Chief Prosecutor’s Office, with the assistance of the Counter-Terrorism Department (TEM) and the Intelligence Directorate. A total of 208 individuals were taken into custody, many of whom were female university students or minors, often with no previous criminal history. Public announcements by the Minister of Interior framed the operation as a major dismantling of the alleged organisational structure of the Gülen Movement. Official social media communications published photos of handcuffed individuals and declared that the “current

structure of the organisation was deciphered”, prior to any formal judicial finding of guilt.

Although the exact charges remain unclear, the detentions appear to relate to accusations of “membership in a terrorist organisation” under article 314 of the Turkish Penal Code. Individuals were reportedly interrogated for engaging in entirely lawful conduct, such as applying for passports and travelling abroad for tourism or study (including participation in Erasmus programmes), transferring money to roommates to cover rent, using secure messaging applications such as Signal or Jitsi, or having a family member previously dismissed by decree or convicted after the 2016 coup attempt.

The investigation reportedly relies heavily on the testimony of a single anonymous witness and the contents of a USB drive purportedly containing audio and written materials concerning travel, housing or student life abroad. There is no evidence that the contents of the USB directly implicate the individuals detained, nor has any information been provided regarding the chain of custody or authenticity of this material. Nevertheless, these materials were reportedly used as the primary justification for arrest warrants and home raids.

Numerous procedural irregularities were reported during the initial detention phase. Detainees were denied access to legal counsel for the first 24 hours. Families were either not informed of the detainees’ whereabouts or were misled about their location. Lawyers were reportedly expelled from police stations or prevented from meeting their clients. In some cases, defence counsel were forced to sign pre-prepared minutes, and detainees were pressured to sign statements in the absence of any legal representation. Case files were restituted under article 153/2 of the Criminal Procedure Code, preventing timely access to evidence and hindering the right to an effective defence. Detainees were brought before the Gaziantep 5<sup>th</sup> Criminal Judgeship of Peace and placed in pre-trial detention based on formulaic reasoning lacking any individualised assessment.

#### *The case of Ms. Elif Değirmenci*

Ms. Elif Değirmenci is a 23-year-old final-year psychology student at Ankara University, who was arrested at approximately 5:20 a.m. on 6 May 2025 at her home in Yenimahalle, Ankara, where she lived with two other students. She was allegedly given less than 10 minutes to prepare, denied the opportunity to change clothes, forced to unlock her phone despite her explicit refusal and her prescribed medication was left behind. She was allegedly given less than 10 minutes to prepare, denied the opportunity to change clothes, forced to unlock her phone despite her explicit refusal and her prescribed medication was left behind. She was first taken to Ankara Police Department and the following day transferred over 750 kilometres to Gaziantep. Her family were not informed of her location for two days.

During her detention, Ms. Değirmenci was reportedly subjected to verbal harassment, coercive questioning, and denied timely access to legal counsel or hygienic facilities. In detention in both Ankara and Gaziantep, she was reportedly kept in an overcrowded and a cell which mixed male and female

prisoners. Her interrogation was conducted without legal representation, under the designation of a “preliminary interview”, and documented as an “information note.” When she requested a lawyer, she was reportedly shouted at, insulted and threatened with life imprisonment. She reportedly endured humiliating strip searches. At her detention hearing on 7 May 2025, Ms. Değirmenci denied all allegations, explaining that her international travel was for academic purposes and that her use of messaging applications or shared student housing bore no relation to ideological activity. She cited her clean criminal record, mental health conditions, and imminent graduation as grounds for release. Despite this, she was placed in pretrial detention based on standardised reasoning citing the severity of the offence and risk of absconding, with no reference to her individual circumstances. Her current detention – far from her family, under conditions more restrictive than national policy permits – has had serious implications for her psychological health, access to education, and basic human dignity.

On 26 June 2025, the Terrorism Crimes Investigation Bureau of the Gaziantep Chief Public Prosecutor’s Office filed an indictment against Ms. Değirmenci under article 314/2 of the Turkish Penal Code (membership in an armed terrorist organization) (Investigation No: 2025/51824, Case No: 2025/21299, Indictment No: 2025/3678). Initially assigned to the Gaziantep 2nd High Criminal Court, on 10 July 2025, the Court declared a lack of jurisdiction and transferred the case to Ankara. Proceedings before the Ankara 17th High Criminal Court formally commenced on 29 July 2025 with the issuance of a preliminary hearing record (*tensip zaptı*). Following a request submitted by her legal counsel, Ms. Değirmenci was released on the same day by majority decision of the Ankara 17th High Criminal Court. Nevertheless, the Court imposed a travel ban prohibiting her from leaving the country. The first substantive hearing in her trial is scheduled to take place on 29 September 2025.

It is alleged that the charges brought against Ms. Değirmenci are based on lawful activities and a presumed association or perceived affiliation with the Hizmet Movement. The indictment states that:

*"It was determined that the individuals named Elif Değirmenci, (...) continued their university education in Ankara, and that there was no personal connection between them (such as hometown, address, kinship, etc.). Despite this, it was reported by affiliated institutions that they resided together at the address (...). Additionally, since the parents of these individuals had judicial records as part of investigations into the FETÖ/PDY terrorist organization, their cohabitation at the same address despite being enrolled at different universities and having different enrollment dates, along with the fact that they had records of departing abroad (to Bosnia and Herzegovina) on the same flight, and that audio files referenced in the case included conversations stating that overseas training camps were held in Bosnia and Herzegovina, Albania, Georgia, and North Macedonia, all suggest that their coming together is not consistent with the ordinary course of life. It was therefore assessed that they participated in an OVERSEAS TRAINING*

*CAMP allegedly organized by the organization and were carrying out activities within the FETÖ/PDY terrorist organization.*

Ms. Değirmenci's arrest and detention have had a profound and disruptive impact on her education. At the time of her arrest, she was preparing for her final examinations in the last semester of her university studies and was counting down the days to graduation. As a direct result of her detention, she was unable to sit for her exams, was excluded from graduating with her peers, and was denied the opportunity to attend the graduation ceremony.

While Ms. Değirmenci has been released, 25 of the 30 students arrested in the same Gaziantep-based operation are said to remain in pretrial detention, facing similarly vague and unsubstantiated charges. It is alleged that the case of Ms. Değirmenci may not be isolated but indicates a broader pattern of repression reportedly targeting youth and women, including female university students, pregnant women, and mothers of young children. These individuals are allegedly being subjected to arbitrary detention across various regions of Türkiye under charges that appear to be politically motivated and not only on alleged links to the Hizmet Movement but on family ties.

On 18 September 2025, the İstanbul 24th High Criminal Court issued its judgment in what has been widely referred to as the "girls' trial." Nineteen defendants were convicted and 19 acquitted on charges of membership in a terrorist organisation. Reports indicate that the group of approximately 41 defendants included numerous young women and several high-school-aged girls, prosecuted on the basis of participation in religious study circles, voluntary educational activities, and other routine social conduct. It is alleged that no evidence of violence or incitement was presented at trial, and that the convictions rested instead on lawful association, family background, and religious observance. The outcome illustrates that arrests and indictments based on tenuous associations have now resulted in criminal convictions, with severe consequences for the educational and professional futures of the young women concerned.

While we do not wish to prejudge the accuracy of these allegations, we are deeply concerned that many arrests appear to have been based not on individualised evidence of genuine criminal activity or terrorist affiliation, but for conduct constituting a legitimate exercise of human rights. The apparent abuse of counterterrorism legislation seems to have violated the rights to education, association, family life, and due process, and the rights of children. Public statements made by Turkish authorities, prior to any judicial determination, employed language that was accusatory and stigmatising, thereby undermining the presumption of innocence and contributing to the broader securitisation of ordinary civil and educational activities. Of particular concern is the unprecedented targeting of minor children – through surveillance, coercive detention, and prosecution – based primarily on the activities or affiliations of their family members. Allegations regarding the treatment of children in detention raise serious concern about their compatibility with international standards on the rights of the child, due process, and the rule of law.

Should these allegations be confirmed, they may constitute violations of Türkiye's obligations under international human rights law, including: the prohibition of torture and other cruel, inhuman or degrading treatment; article 7 of the International Covenant on Civil and Political Rights (ICCPR), acceded to by Türkiye on 23 September 2003; articles 2, 12, and 16 of the Convention Against Torture (CAT), ratified on 2 August 1988; and article 3 of the European Convention on Human Rights (ECHR), ratified in May 1954, the right to liberty and security of person (article 9 of the ICCPR), the right to a fair trial (article 6 of the ECHR; article 14 of the ICCPR), the principle of legality and non-retroactivity (article 15 of the ICCPR), and the right to respect for privacy and family life (article 8 of the ECHR; article 17 of the ICCPR). In addition, the measures may infringe on the rights to freedom of expression, peaceful assembly, and association (articles 19, 21, and 22 of the ICCPR, as well as the right to equality before the law and protection against discrimination (article 26 of the ICCPR and under the Convention on the Elimination of Discrimination against Women (CEDAW), ratified on 20 December 1985), and the right to education (article 13 of the International Covenant on Economic, Social and Cultural Rights (ICESCR), acceded to on 23 September 2003. With respect to the treatment of minors, further violations may arise under the Convention on the Rights of the Child (CRC), ratified on 4 April 1995, including articles 3, 37, and 40, which guarantee the best interests of the child as a primary consideration, protection against arbitrary detention, and minimum guarantees during criminal proceedings. In the case of Ms. Değirmenci, additional concerns arise with respect to the right to the highest attainable standard of physical and mental health (article 12 of the ICESCR) and the right to education (article 13 of the ICESCR).

### *Arbitrary deprivation of liberty and the principle of legality*

We are concerned that in both the 2024 and 2025 operations, individuals were reportedly detained based on formulaic justifications without individualised risk assessments. Furthermore, individuals were reportedly arrested for conducts that do not genuinely constitute terrorist or criminal activities. This includes family relationships or the lawful activities of relatives - such as trade union membership, financial transactions, or professional affiliations- amounting to "guilt by association", which is inconsistent with the general principle of individual responsibility. Arrests also reportedly targeted minors and university students, such as international travel, cohabitation, peer-to-peer financial transfers, attendance at certain educational institutions, the use of encrypted messaging applications. Such arrests appear to be arbitrary, being neither necessary nor proportionate in pursuit of any legitimate security or law enforcement aim. If confirmed, such detentions would be incompatible with Türkiye's obligations under article 9 of the ICCPR, which requires that any deprivation of liberty be lawful, necessary, reasonable, and based on an objective and individualised assessment of risk. Article 37 of the CRC specifically prohibits the unlawful or arbitrary deprivation of liberty of children and requires that detention be used only as a measure of last resort and for the shortest appropriate period of time. The alleged treatment of these minors appears to contravene these foundational principles.

Further, some of these arbitrary arrests may have been enabled by vague and overbroad terrorism and terrorist organization offences, particularly under article 314 of Türkiye's Penal Code, as well as over-expansive interpretations of them. Some offences appear to permit arrest in the absence of violent intent, incitement, or operational support for a proscribed organisation. Such offences appear to violate the

principle of legality (*nullum crimen sine lege*) under article 15 of the ICCPR, which requires offences to be clear, precise, narrow and reasonably foreseeable, to enable individuals to regulate their conduct accordingly (see also General Comment No. 29, para. 7). This lack of legal certainty appears to have enabled arbitrary and discriminatory enforcement, exposing individuals – particularly vulnerable minors – to unjust prosecution based on tenuous or indirect associations rather than personal culpability.

Arbitrariness appears evident in the arrest of Ms. Elif Değirmenci, who was denied legal representation and later subjected to judicial control measures, including a travel ban, despite having no criminal record and without apparent consideration of her health conditions and academic status.

### ***The right to a fair trial***

In both operations, individuals were reportedly denied timely access to legal counsel, including during initial interrogations, in violation of their right to effective defence. Defence lawyers were reportedly expelled from police stations, obstructed from conferring with clients, and in some cases coerced into signing pre-prepared records. Statements were reportedly taken from detainees, including minors, without the presence of a lawyer or guardian. Some of these statements were formally recorded as “information notes” or “preliminary interviews,” thereby circumventing procedural guarantees.

In addition, the restriction of investigation files under article 153(2) of the Turkish Criminal Procedure Code denied defence counsel access to the evidence needed to effectively challenge the lawfulness of the arrest or the credibility of the underlying materials, including anonymous witness testimony and unverified USB contents. In the case of Elif Değirmenci, despite the absence of any direct or incriminating evidence, the court issued a pre-trial detention order based on generalised language and failed to consider her individual circumstances or alternative non-custodial measures.

These irregularities suggest a broader pattern in which core elements of due process were not respected. In the case of minors, the absence of legal assistance, repeated questioning under coercive conditions, and failure to apply child-sensitive procedures are incompatible with international standards on juvenile justice, including those enshrined in article 40 of the CRC.

If confirmed, these failures would constitute violations of Türkiye’s obligations under article 14 of the ICCPR, article 6 of the ECHR, and article 40 of the CRC, and would render the detention and prosecution of the individuals concerned fundamentally unfair.

The convictions delivered in September 2025 further demonstrate the misuse of counter-terrorism legislation to criminalise peaceful conduct. That university and secondary school students could be convicted for engaging in routine educational and social activities, absent evidence of violent intent or operational support for terrorism, is incompatible with Türkiye’s obligations under article 15 of the ICCPR (requirement of legality) and article 14 of the ICCPR and article 6 of the ECHR (right to a fair trial).

Where minors were defendants, the proceedings also raise serious concerns under articles 3, 37 and 40 of the CRC, which require that the best interests of the child be a primary consideration, that detention and criminalisation of children be used only as a measure of last resort, and that children benefit from age-appropriate procedures. Article 40 of the CRC specifically guarantees the right of every child accused of having infringed criminal law to be presumed innocent, to be informed promptly and directly of the charges, to have legal assistance, and to be treated in a manner consistent with their sense of dignity and worth. The lack of access to legal counsel during interrogations and the alleged use of degrading language during questioning are incompatible with these guarantees.

These convictions entrench the pattern already observed in the May 2024 and May 2025 operations, whereby ordinary educational, social and religious practices are retroactively re-characterised as terrorist activity.

### ***Prohibition of torture and ill-treatment***

We are deeply concerned by the reported treatment of individuals arrested during the May 2024 operation, including allegations that children were removed from their homes in early morning raids, handcuffed, denied access to food and sanitary facilities for prolonged periods, subjected to coercive questioning, and verbal threats. Forensic medical examinations were reportedly carried out while children remained in restraints. The interrogations occurred without the presence of legal counsel, family members, or independent child protection officers.

The Committee on the Rights of the Child, in general comment No. 24 (CRC/C/GC/24), and the Special Rapporteur on Torture (A/HRC/28/68), have underscored that children are particularly vulnerable in custody and require heightened safeguards. The use of intimidation and coercion during questioning, especially without legal or familial support, may meet the threshold of ill-treatment under international law. Any form of intimidation, threats, or psychological pressure against children during detention or interrogation may constitute ill-treatment and, in certain circumstances, torture—particularly where power imbalances, isolation, and age-related vulnerabilities are present (see CRC/C/GC/24 and A/HRC/28/68).

The treatment of Elif Değirmenci during the May 2025 operation also raises serious concerns. She was reportedly denied timely access to a toilet, shouted at and insulted when she requested legal assistance, and subjected to coercive questioning while in a medically vulnerable state. She suffers from a diagnosed panic disorder and stress-induced urticaria, which were reportedly aggravated by the conditions of detention and the lack of access to her prescribed medication. The absence of appropriate medical care or mental health support may, in this context, constitute cruel, inhuman or degrading treatment, particularly given the foreseeable risk of psychological and physical harm.

If substantiated, the acts described would be inconsistent with Türkiye's obligations under article 7 of the ICCPR, article 3 of the ECHR, and articles 2, 11, and 16 of the CAT, and may constitute cruel, inhuman or degrading treatment or

punishment. When inflicted on children or other vulnerable persons, such conduct may also reach the threshold of torture.

### ***Failure to investigate allegations of torture and ill-treatment***

We note with concern the reported inaction in response to the criminal complaint lodged by Aysu Öztaş Bayram regarding the treatment of her daughters. The lack of a prompt and transparent inquiry may amount to a procedural violation of the right to effective remedy. Under treaty and customary international law, Türkiye is under a duty to ensure that such allegations are proactively, regardless of whether a formal complaint has been submitted, and that perpetrators are held accountable. This would constitute a breach of article 13 of the ECHR, article 2(3) of the ICCPR and article 16 of the CAT.

### ***Discrimination and equality before the law***

The pattern of detaining young women and students based on real or perceived associations by family members (predominantly male) with the Gülen movement, education, or other lawful personal activities, rather than any individualised evidence of wrongdoing, suggests discriminatory enforcement of counter-terrorism powers, contrary to article 26 of the ICCPR. The lengthy pre-trial detention and mistreatment of Ms. Elif Değirmenci, as well as the targeting and arrests of female students, represent a concerning crackdown on women and girls' activism and participation in public life, freedoms which are guaranteed under article 7 of CEDAW.

### ***Targeted surveillance and disproportionate restrictions for minors***

We are particularly concerned by the allegations that some of the minors were subjected to prolonged and intrusive surveillance, including physical monitoring and wiretapping, on the basis of allegations of “founding, leading, and membership in an armed terrorist organisation.” These measures appear, in some instances, to have been authorised in the absence of any direct evidence of criminal conduct and were predicated primarily on the actual or alleged association of her parents with adults allegedly linked to the Gülen movement.

Such surveillance, particularly when directed at a child, raises serious concerns under article 8 of the ECHR, article 17 of the ICCPR, and article 16 of the CRC, all of which protect the right to privacy, family life, and personal integrity. The targeting of a minor for months of covert surveillance based on the protected and lawful activities of her parents – including union membership and financial transactions – may constitute an unnecessary, disproportionate and unlawful interference with her rights. It may further violate the requirement under article 3(1) of the CRC that the best interests of the child must be a primary consideration in all actions concerning children.

Further, the imposition of judicial control measures on minors including an international travel ban, may constitute an unjustified restriction on their right to freedom of movement under article 12 of the ICCPR and Protocol No. 4 to the ECHR, including the right to leave their own country. These measures, particularly when applied to a minor with no history of flight or independent wrongdoing, may also have significant negative consequences for her rights to education, development, and

participation in public life, contrary to article 28 and article 3(1) of the CRC, which affirms the best interests of the child as a primary consideration in all actions concerning them.

Taken together, these measures appear to reflect a punitive approach towards a child based not on her own criminal conduct, but on perceived guilt by association. If confirmed, such actions would constitute a serious departure from Türkiye's obligations under international human rights and child protection law.

### ***The rights to education and health***

Ms. Değirmenci's detention occurred approximately six weeks prior to the completion of her undergraduate degree. Her academic progress has reportedly been halted due to restrictions on communication, lack of materials, and inadequate procedural alternatives. No accommodations were made to enable her to submit her thesis or sit final examinations. The criminalisation of her pursuit of education – including her lawful travel for academic purposes and related residence in shared student housing – raises further concerns under article 13 of the ICESCR, which protects the right to education and the development of the individual.

Furthermore, the failure to provide Ms. Değirmenci with prescribed medication, and the absence of adequate mental health support in detention, may violate article 12 of the ICESCR, which guarantees the right to the highest attainable standard of physical and mental health. Her diagnosed panic disorder and chronic urticaria are exacerbated by detention conditions, family separation, and limited visitation, compounding the risk of psychological harm.

### ***Systematic arbitrary detention of Gülen movement associates since 2016***

Both the May 2024 and May 2025 operations must be understood within the broader context of a sustained campaign of mass arrests and detentions in Türkiye – beginning after the attempted coup of 15 July 2016 – resulting in the deprivation of liberty for hundreds of thousands of individuals, including volunteers and sympathizers of the Gülen Movement. These individuals have been charged with terrorism-related offences absent concrete evidence, under laws invoked in the name of national security.

The Human Rights Committee has repeatedly expressed concern about Türkiye's counter-terrorism legislation, finding it incompatible with the ICCPR. The Committee has highlighted the vague definitions of terrorism, the lack of legal clarity and safeguards, and the risk of arbitrary prosecutions. In its most recent concluding observations, the Committee urged Türkiye to narrow its overly broad provisions and ensure such laws are not used to suppress civil society, while calling for full legal protections for those accused of terrorism (CCPR/C/TUR/CO/2, paras. 17 and 18).

Similarly, in its concluding observations on the fourth periodic report of Türkiye in 2021, the Committee Against Torture noted persistent violations of procedural safeguards during detention, including delays in access to legal counsel, interrogations conducted without a lawyer present, the denial of confidentiality between lawyer and client, and restricted access to case files (CAT/C/TUR/CO/4, para. 15).

Between June 2017 and March 2024, the Working Group on Arbitrary Detention (WGAD) adopted 24 opinions<sup>1</sup> finding that detentions of individuals accused of Gülen Movement affiliations were arbitrary and lacked legal basis. The WGAD condemned the systemic practice of guilt by association, whereby individuals are targeted based on perceived political opinions or affiliations. In its most recent opinions, the WGAD warned that this pattern may, under certain conditions, amount to crimes against humanity under international law. The WGAD has also noted in its recent opinions a pattern “emerging whereby those with alleged links to the movement are being targeted based on their political or other opinion, in violation of articles 2 and 7 of the Universal Declaration of Human Rights and articles 2(1) and 26 of the Covenant.”<sup>2</sup>

According to official figures, over 8,800 people were detained between June 2023 and June 2024 alone, with 1,500 formally charged. Former Interior Minister stated that between July 2016 and June 2022, 332,884 individuals were detained for alleged Gülen links. As of July 2024, more than 702,000 people have reportedly been investigated under article 314 of the Turkish Penal Code.

These concerns have been echoed by the European Court of Human Rights (ECtHR), which has issued judgments in at least 35 group cases, finding violations of the right to liberty and security of more than 2,200 individuals. In its landmark *Yüksel Yalçınkaya* judgment (26 September 2023), the Grand Chamber ruled that Türkiye’s conviction of individuals solely for use of the ByLock messaging app, without proof of intent or material contribution, violated article 7 of the ECHR. Despite this, the Turkish Government has yet to implement legislative or judicial reforms to bring its practice into compliance.

The Human Rights Committee’s finding in *Alakus v. Türkiye* (CCPR 2020/135) reaffirmed that mere sympathy with the Gülen Movement, absent any personal or material evidence of criminal activity, cannot justify detention under article 9 of the ICCPR.

In our prior communication (TUR 5/2024, we underscored that the designation of the Hizmet Movement as a terrorist organisation does not meet due process standards nor the model definition of terrorism advanced by the Special Rapporteur for the promotion and protection of human rights while countering terrorism. As reiterated in TUR 13/2020, Anti-Terror Law No. 3713 and provisions of the Penal Code are drafted in overly broad terms, enabling their systematic misuse against dissidents, journalists, and individuals perceived as affiliated with the Gülen Movement. The ongoing use of

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<sup>1</sup> Ali Ünal, A/HRC/WGAD/2023/3; Muhammet Şentürk, A/HRC/WGAD/2023/29; Alettin Duman, Tamer Tibik, A/HRC/WGAD/2022/8; Osman Karaca, A/HRC/WGAD/2020/84; Ahmet Dinçer Sakaoğlu, A/HRC/WGAD/2020/67; Levent Kart, A/HRC/WGAD/2020/66; Nermin Yasar, A/HRC/WGAD/2020/74; Arif Komiş, Ülkü Komiş and four minors, A/HRC/WGAD/2020/51; Kahraman Demirez, Mustafa Erdem, Hasan Hüseyin Günakan, Yusuf Karabina, Osman Karakaya and Cihan Özkan, A/HRC/WGAD/2020/47; Faruk Serdar Köse, A/HRC/WGAD/2020/30; Akif Oruc, A/HRC/WGAD/2020/29; Abdulmatip Kurt, A/HRC/WGAD/2020/2; Ercan Demir, A/HRC/WGAD/2019/79; Melike Göksan, Mehmet Fatih Göksan, A/HRC/WGAD/2019/53; Mustafa Ceyhan, A/HRC/WGAD/2019/10; Hamza Yaman, A/HRC/WGAD/2018/78; Muharrem Gençtürk, A/HRC/WGAD/2018/44; Ahmet Caliskan, A/HRC/WGAD/2018/43; Mestan Yayman, A/HRC/WGAD/2018/42; Mesut Kaçmaz, Meral Kaçmaz and two minors, A/HRC/WGAD/2018/11; 10 individuals associated with the newspaper Cumhuriyet, A/HRC/WGAD/2017/41; Kursat Çevik, A/HRC/WGAD/2017/38; Rebi Metin Görgeç, A/HRC/WGAD/2017/1.

<sup>2</sup> See for example, among many others: WGAD Opinion No. 6/2024 concerning Meryem Tekin, 8 May 2024, para. 65.

these laws continues to result in arbitrary detention, violations of privacy, and threats to personal security.

Despite the clear and repeated findings of violations by the ECtHR, the WGAD, and other UN treaty bodies, we are concerned that your Excellency's Government seems to continue engaging in a widespread and systematic campaign of arbitrary arrest and detention against perceived Gülen supporters who are not involved in genuinely criminal violence against the State. The misuse of counter-terrorism legislation in a discriminatory and overly expansive manner may constitute a violation of Türkiye's obligations under international human rights law.

In connection with the above alleged facts and concerns, please refer to the **Annex on Reference to international human rights law** attached to this letter which cites international human rights instruments and standards relevant to these allegations.

As it is our responsibility, under the mandates provided to us by the Human Rights Council, to seek to clarify all cases brought to our attention, we would be grateful for your observations on the following matters:

1. Please provide any information or comment you may have on the accuracy of the facts as set out above.
2. Please explain the legal and factual basis for the arrest and detention of individuals during the 7 May 2024 and 6 May 2025 operations, including the specific conduct alleged to amount to criminal or terrorist activity.
3. Please indicate the manner in which the use of counter-terrorism powers is justified in cases where the alleged activities appear to be lawful and do not contribute to terrorist violence.
4. Please provide detailed information on the procedural safeguards afforded to the minors detained during the May 2024 operation, including the grounds for their apprehension, the presence of legal or parental representation, and any steps taken to ensure their treatment was consistent with the Convention on the Rights of the Child.
5. Please explain the rationale and evidentiary basis for the intrusive surveillance measures reportedly imposed on students, their families, and their homes at the request of the prosecutor's office, including judicial authorisations for wiretapping and monitoring. Please further indicate how these measures were consistent with the right to privacy, including the requirements of necessity, proportionality and non-discrimination under international law.
6. Please clarify the grounds for the two months of pre-trial detention of Ms. Elif Değirmenci, including whether the court considered alternative, non-custodial measures in view of her health status, academic obligations, and lack of criminal record, in compliance with the United

Nations Rules for the Treatment of Women Prisoners and Non-custodial Measures for Women Offenders (Bangkok Rules).

7. Please indicate what procedural safeguards were in place to ensure access to legal counsel from the outset of detention in both operations, and what measures are taken to prevent obstruction of lawyer-client meetings during anti-terror operations.
8. Please explain the evidentiary value accorded to anonymous witness testimony and digital materials of uncertain provenance (such as the USB stick reportedly used in the May 2025 operation), and how such reliance is reconciled with fair trial guarantees under article 14 of the ICCPR.
9. Please indicate whether any investigations have been opened into allegations of ill-treatment of children or adults detained in the course of these operations, including the complaint filed by Aysu Öztaş Bayram. If not, please explain why. Please indicate whether any officials—including law enforcement or child protection personnel—have been held accountable for acts or omissions that may amount to torture, ill-treatment, or a failure to protect vulnerable individuals in custody.
10. Please provide detailed information concerning the September 2025 judgment of the İstanbul 24th High Criminal Court in the so-called “girls’ trial,” including: (a) the legal and evidentiary basis for the convictions of 19 defendants; (b) whether the activities in question involved any element of violence or incitement; (c) the safeguards applied to defendants who were minors at the time of the alleged conduct; (d) the remedies and appeal rights available to those convicted; and (e) the steps taken by your Excellency’s Government to ensure that peaceful educational, religious and social activities are not criminalised under counter-terrorism legislation in future.
11. Please provide information on measures taken by your Excellency’s Government to ensure that counter-terrorism operations are conducted in a manner consistent with Türkiye’s obligations under the ICCPR, ICESCR, CRC, CEDAW, CAT and the ECHR, including with respect to children, students, and individuals exercising their rights to freedom of expression, privacy, and association. Please indicate whether the law on terrorist listings will be amended to be consistent with international law.

This communication and any response received from your Excellency’s Government will be made public via the communications reporting [website](#) within 60 days. They will also subsequently be made available in the usual report to be presented to the Human Rights Council.

Further, we would like to inform your Excellency’s Government that after having transmitted the information contained in the present communication to the Government, the Working Group on Arbitrary Detention may also transmit the case

through its regular procedure in order to render an opinion on whether the deprivation of liberty was arbitrary or not. The present communication in no way prejudices any opinion the Working Group may render. The Government is required to respond separately to the allegation letter and the regular procedure.

While awaiting a reply, we urge that all necessary interim measures be taken to halt the alleged violations and prevent their re-occurrence and in the event that the investigations support or suggest the allegations to be correct, to ensure the accountability of any person(s) responsible for the alleged violations.

Please accept, Excellency, the assurances of our highest consideration.

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

Matthew Gillett  
Vice-Chair on communications of the Working Group on Arbitrary Detention

Farida Shaheed  
Special Rapporteur on the right to education

Irene Khan  
Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression

Gina Romero  
Special Rapporteur on the rights to freedom of peaceful assembly and of association

Ana Brian Nougrères  
Special Rapporteur on the right to privacy

Nazila Ghanea  
Special Rapporteur on freedom of religion or belief

Claudia Flores  
Chair-Rapporteur of the Working Group on discrimination against women and girls

## Annex

### Reference to international human rights law

In connection with above alleged facts and concerns, we would like to draw the attention of your Excellency's Government to the principles and international standards applicable to this communication.

#### *Respect for human rights while countering terrorism*

Although no universal treaty generally defines “terrorism”, States should ensure that counter-terrorism legislation is limited to criminalizing conduct which is properly and precisely defined on the basis of the international counter-terrorism instruments, the General Assembly’s Declaration on Measures to Eliminate International Terrorism (1994), and Security Council resolution 1566 (2004). Based on these authoritative sources, the model definition of terrorism advanced by the Special Rapporteur on the promotion and protection of human rights and fundamental freedoms while countering terrorism provides clear, “best practice” guidance, by identifying conduct that is genuinely terrorist in nature and precisely defining the elements (A/HRC/16/51, para. 28).

The principle of legal certainty under article 15(1) of the ICCPR requires that criminal laws are sufficiently precise so that it is clear what types of behaviour and conduct constitute a criminal offence and the legal consequences of committing such an offence. This principle recognizes and seeks to prevent ill-defined and/or overly broad laws which are open to arbitrary application and abuse, to target civil society on political or other unjustified grounds (A/70/371, para. 46(b)).

Many resolutions of the United Nations General Assembly, Security Council and Human Rights Council reaffirm that any measures taken to combat terrorism and violent extremism must comply with the obligations of States under international law, in particular international human rights law, refugee law and international humanitarian law (A/HRC/RES/22/6, para. 10(a)). Counter-terrorism measures must conform to fundamental requirements of legality, proportionality, necessity and non-discrimination. The wholesale adoption of security and counter-terrorism regulations without due regard for these principles can have exceptionally deleterious effects on the protection of fundamental rights, particularly for minorities, historically marginalized communities, and civil society.

States must ensure that measures to combat terrorism and preserve national security do not hinder the work and safety of individuals, groups and organs of society engaged in promoting and defending human rights.

#### *Right to privacy*

Article 17 of the ICCPR provides that no one shall be subjected to arbitrary or unlawful interference with his privacy, family, home or correspondence, nor to unlawful attacks on honour and reputation, and that everyone has the right to protection of the law against such interference or attacks. Further, in its general comment No. 16

in relation to article 17, the Human Rights Committee asserted that surveillance, whether electronic or otherwise, should ordinarily be prohibited.

#### *Due process and fair trial guarantees*

Article 14 of the ICCPR enshrines the right to a fair trial and due process. In particular, article 14 (1) of the ICCPR sets out a general guarantee of equality before courts and tribunals and the right of every person to a fair and public hearing by a competent, independent and impartial tribunal established by law. In addition, article 14 (3) of the ICCPR guarantees the right of any individual charged with a criminal offence to have adequate time and facilities for the preparation of their defence, to communicate with counsel of their own choosing, and to be tried without undue delay.

#### *Arbitrary detention*

Article 9 of the ICCPR prohibits arbitrary detention. Specifically, it establishes that no one shall be deprived of his or her liberty (unless it is in accordance with appropriate laws), and that anyone who is arrested shall be brought promptly before a judge or officer authorized by law to exercise judicial power, and that anyone arrested shall be entitled to trial within a reasonable time. Pre-trial detention should thus be the exception rather than the rule (general comment No. 35, para. 38). A person may only be deprived of liberty in accordance with national laws and procedural safeguards governing detention (including in relation to arrest and search warrants), and where the detention is not otherwise arbitrary. In this respect, deprivation of liberty resulting from the exercise of the rights or freedoms guaranteed by the ICCPR is considered arbitrary (general comment No. 35, para. 17).

#### *Torture or inhuman or degrading treatment or punishment*

The prohibition on torture and cruel, inhuman or degrading treatment or punishment is absolute and non-derogable (UDHR article 5; ICCPR article 7 and 2 (3); Convention against Torture and Other Cruel, Inhuman and Degrading Treatment or Punishment (CAT) articles 1, 2, 15 and 16). States parties to the CAT must establish all acts of torture as offences under domestic law (article 4), exercise jurisdiction over said offences (article 5), receive complaints and examine them promptly and impartially (article 13), and investigate those allegations promptly and impartially (article 12). At no time shall torture be used to extract information or a confession (article 1), and any statement which has been obtained via such methods shall be excluded from any proceedings except against a person accused of torture as evidence that the statement was made (article 15). Victims are to be protected from reprisals or intimidation during said investigations (article 13) and they have an enforceable right to fair and adequate compensation including the means for as full rehabilitation as possible (article 14). States party to the CAT have overarching obligations to prevent torture and other cruel, inhuman or degrading treatment or punishment via effective legislative, administrative, judicial and other measures (articles 2 and 16), to educate and train relevant personnel on the prohibition (article 10) and to keep all rules, instructions, methods and practices relating to interrogation, custody and treatment under systematic review (article 11).

The standards of conditions and treatment of persons deprived of their liberty are contained in the UN Standard Minimum Rules for the Treatment of Prisoners (Nelson Mandela Rules), which establish that all prisoners shall be treated with dignity and no prisoner shall be subjected to torture or other cruel, inhuman or degrading treatment or punishment. Prolonged incommunicado detention or detention in secret places can facilitate the perpetration of torture and other cruel, inhuman or degrading treatment or punishment and can in itself constitute a form of such treatment (General Assembly Resolution 79/209, para. 18); prolonged solitary confinement of the detained or imprisoned person may amount to acts prohibited by article 7 of the ICCPR (general comment No. 20, para. 6). Furthermore, under CAT there is an obligation to prevent acts of torture and ill-treatment (article 2), to promptly and impartially investigate allegations (article 12), and to prosecute those responsible (articles 4 and 5).

### *Freedom of movement*

Article 12 of the ICCPR protects the right of individuals to liberty of movement and freedom to choose their residence within a State's territory. It also guarantees the right to leave any country, including one's own, and to enter one's own country. These rights may be subject only to restrictions that are provided by law, necessary to protect national security, public order, public health or morals, or the rights and freedoms of others, and which are consistent with the other rights recognized in the Covenant.

The Human Rights Committee in general comment no. 27 (1999) has clarified that any restrictions on freedom of movement must be strictly necessary and proportionate to achieve a legitimate aim. Measures such as arbitrary travel bans, disproportionate surveillance, or movement restrictions based on political affiliation or collective punishment are inconsistent with article 12. The right to enter one's own country is particularly robust and may not be subject to arbitrary denial under any circumstances.

### *Freedom of opinion and expression*

Article 19 of the ICCPR guarantees the right to freedom of opinion and the right to freedom of expression, which includes the right "to seek, receive and impart information and ideas of all kinds, either orally, in writing or in print, in the form of art, or through any other media". This right applies online as well as offline and includes not only the exchange of information that is favourable, but also that which may criticize, shock, or offend. In its [general comment No. 34](#), the Human Rights Committee stated that States parties to the ICCPR are required to guarantee the right to freedom of expression, including "political discourse, commentary on one's own and on public affairs, canvassing, discussion of human rights, journalism, cultural and artistic expression, teaching, and religious discourse" (CCPR/C/GC/34, para. 11).

The Committee further asserts that there is a duty of States to put in place effective measures to protect against attacks aimed at silencing those exercising their right to freedom of expression (para. 23). Further, the Committee also states that "States parties should ensure that counter-terrorism measures are compatible with paragraph 3. Such offences as "encouragement of terrorism" and "extremist activity" as well as offences of "praising", "glorifying", or "justifying" terrorism, should be clearly defined

to ensure that they do not lead to unnecessary or disproportionate interference with freedom of expression” (para. 46).

Any restriction on the right to freedom of expression must be compatible with the requirements set out in article 19(3) ICCPR. Under these requirements, restrictions must (i) be provided by law; (ii) pursue one of the legitimate aims for restriction, which are the respect of the rights or reputations of others and the protection of national security or of public order (*ordre public*), or of public health or morals; and (iii) be necessary and proportionate for those objectives. The State has the burden of proof to demonstrate that any such restrictions are compatible with the Covenant, proving “in specific and restrictions must be “the least intrusive instrument among those which might achieve their protective function” ([CCPR/C/GC/34, para. 34](#)).

### *Right to education*

The right to education is protected under article 13 of the International Covenant on Economic, Social and Cultural Rights (ICESCR). States are obliged to ensure that education is available, accessible, acceptable, and adaptable to all individuals, without discrimination. Education is both a human right in itself and an indispensable means of realizing other rights. States must also refrain from actions that directly or indirectly impede access to education, including arbitrary arrests, discriminatory restrictions, and undue surveillance of students, families, or educators. Targeting individuals based on political or religious affiliation, whether real or perceived, violates the principles of non-discrimination and equality under article 2 of the Covenant.

### *Right to health*

The right to the highest attainable standard of physical and mental health is enshrined in article 12 of the ICESCR. This right includes access to timely, acceptable, and affordable health care, as well as to the underlying determinants of health such as adequate nutrition, hygiene, and humane conditions of detention.

According to the Committee on Economic, Social and Cultural Rights (CESCR) in its general comment No. 14 (2000), States are obliged to respect, protect, and fulfil the right to health without discrimination, including for those in detention or facing national security-related accusations. The Committee emphasizes that “States are under the obligation to respect the right to health by, inter alia, refraining from denying or limiting equal access for all persons... to preventive, curative and palliative health services” (E/C.12/2000/4, para. 34).

The Committee has further affirmed that special protective measures must be taken to safeguard the health of vulnerable persons, particularly minors in detention, who are at heightened risk of physical and psychological harm (E/C.12/2000/4, paras. 34 and 50). These include the obligation to provide independent medical assessment, ensure regular access to health professionals, and maintain detention conditions compatible with human dignity.

The Convention on the Rights of the Child (CRC) reinforces these obligations in articles 24 and 37(c), which require States to ensure that children deprived of liberty are treated with humanity and respect, and have access to adequate health services. The

CRC Committee has clarified that the health and well-being of children must be a primary consideration in all decisions regarding detention, and that detention of children should be a measure of last resort and for the shortest appropriate period of time (CRC/C/GC/24, paras. 86–91).

In counter-terrorism contexts, practices such as prolonged detention without access to medical care, denial of food, degrading treatment, or coercive interrogation techniques are incompatible with the right to health and may also amount to cruel, inhuman or degrading treatment, in violation of both the ICESCR and the Convention against Torture.

### *Freedom from gender-based discrimination*

We would like to recall to your Excellency's Government that the Working Group on Discrimination against Women and Girls (WGDAWG), in its 2019 thematic report (A/HRC/41/33) noted that women are deprived of their liberty, mostly arbitrarily and in a discriminatory fashion, in violation of the law and human rights standards. Not only the causes but also the consequences of deprivation of liberty are gendered, and women and girls experience their confinement in specific ways and are often at risk of heightened gender-based discrimination, stigma and violence. Furthermore, the Working Group highlighted that measures to combat terrorism and national security measures sometimes profile and target women, in particular those from certain groups, and sometimes even women human rights defenders. In that regard, it has called upon States to ensure that measures addressing conflict, crisis, terrorism, and national security incorporate a women's human rights focus and do not instrumentalize women's deprivation of liberty for the purposes of pursuing government aims.

In its report on participation in public life (A/HRC/23/50), the WGDAWG called upon States to eliminate all forms of violence against women in order to fulfil women's human rights and to improve the enabling condition for women's participation in political and public life, including by women human rights defenders. In its report on girls' and young women's activism (A/HRC/50/25), the Working Group further expressed that the realization of girls' and young women's human right to participate in public and political life, including organizing and engaging actively with a variety of State and non-State actors, is essential for the protection of their human rights. It has called on States to take all appropriate measures to create safe and enabling spaces for girl and young women activists, where they can exercise their activism and express their views freely, equally, fully and meaningfully on all matters of relevance to them.

In a joint declaration, the WGDAWG emphasized that women human rights defenders face unique challenges, driven by deep-rooted discrimination against women and stereotypes about their appropriate role in society. Today's rising fundamentalisms of all kinds and political populism, as well as unchecked authoritarian rule and uncontrolled greed for profit-making further fuel discrimination against women, intensifying the obstacles facing women human rights defenders. In addition to the risks of threats, attacks and violence faced by all human rights defenders, women human defenders are exposed to specific risks, such as misogynistic attacks, gender-based violence (including sexual violence), lack of protection and access to justice as well as lack of resources. Those working on rights contested by fundamentalist groups such as

women's sexual and reproductive health and rights and those denouncing the actions of extractive industries and businesses are at heightened risk to attacks and violence.<sup>3</sup>

We would also like to refer to General Assembly resolution 68/181, adopted on 18 December 2013, on the protection of women human rights defenders. Specifically, we would like to refer to articles 7,9, and 10, whereby States are called upon to, respectively, publicly acknowledge the important role played by women human rights defenders, take practical steps to prevent threats, harassment and violence against them and to combat impunity for such violations and abuses, and ensure that all legal provisions, administrative measures and policies affecting women human rights defenders are compatible with relevant provisions of international human rights law.

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<sup>3</sup> <https://www.ohchr.org/EN/NewsEvents/Pages/DisplayNews.aspx?NewsID=20938&LangID=E>