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Hala Mazayad Al-Tuwaijri, President of the Saudi Human Rights Commission of Saudi Arabia addresses the 52nd Regular Session of the Human Rights Council, Geneva. © UN Photo / Violaine Martin, licensed under CC BY-NC-ND 2.0

THE SAUDI HUMAN RIGHTS COMMISSION

20 years of whitewashing the Kingdom's human rights record

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1. Introduction

In recent years, the government of the Kingdom of Saudi Arabia has consistently upheld a progressive stance on the advancement of human rights in the country. Through its Saudi Human Rights Commission (SHRC), it regularly emphasises reforms undertaken to protect and promote human rights. While the Kingdom has indeed sought to bring changes to important laws governing women's rights and to release some long held political prisoners, international organisations and civil society organisations have witnessed a different reality.

On the contrary to the government's narrative, human rights organisations have documented a continued crackdown on Saudi women calling for institutional reforms and basic rights; an all-time rise in executions of individuals held for minor drug-related offences or for exercising their right to freedom of expression; and dire conditions of detention, including the practice of torture.

The SHRC was established exactly 20 years ago, through Resolution No. 207 of 12 September 2005.¹ Since its establishment, the SHRC has played a crucial role in upholding a distorted narrative about the current human rights situation in the Kingdom. The SHRC

refers to itself as an independent organization with full autonomy that reports to the king and holds the government to account.² On paper, the SHRC has been mandated with promoting and protecting human rights and is tasked with various responsibilities which include addressing human rights complaints, engaging in legislative work, and monitoring detention facilities.³

National Human Rights Institutions (NHRIs) are generally encouraged to seek accreditation from the Global Alliance of National Human Rights Institutions (GANHRI), a body that assesses the effectiveness

¹ Kingdom of Saudi Arabia, *Statute of the Human Rights Commission*, Royal Decree No. A/30, 12 September 2005, available at: <https://laws.boe.gov.sa/Files/Download/?attId=86943751-8f65-4a01-afee-adbb0103b5b7> (accessed on 22 August 2025), article 1.

² Kingdom of Saudi Arabia, *Initial report submitted under article 35 of the Convention on the Rights of Persons with Disabilities (CRPD/C/SAU/1)*, 19 October 2015, available at: <https://www.hrc.gov.sa/storage/reports-attachment/ETTD6SPWWzB9resbC6Y0h-FyhTbFRPN0NTD96hUNm.pdf> (accessed on 21 August 2025), para. 9; Committee against Torture (CAT), *Third periodic report submitted by Saudi Arabia under article 19 of the Convention against Torture (CAT/C/SAU/3)*, 27 February 2024, available at: <https://undocs.org/en/CAT/C/SAU/3> (accessed on 21 August 2025), para. 13; Kingdom of Saudi Arabia, *Statute of the Human Rights Commission*, issued by Royal Decree No. A/30 of 12 September 2005 (as amended), available at: <https://laws.boe.gov.sa/Files/Download/?attId=86943751-8f65-4a01-afee-adbb0103b5b7> (accessed on 21 August 2025), Article 2; SHRC (Saudi Arabia), *About the Commission* (website, Arabic), updated 27 January 2025, available at: <https://www.hrc.gov.sa/website/about-us> (accessed on 21 August 2025), section "نبذة عن الهيئة" (About the Commission), para. 1.

³ Kingdom of Saudi Arabia, *Statute of the Human Rights Commission*, Royal Decree No. A/30, 12 September 2005, available at: <https://laws.boe.gov.sa/Files/Download/?attId=86943751-8f65-4a01-afee-adbb0103b5b7> (accessed on 22 August 2025), Article 1.

and independence of NHRIs according to international standards adopted by the UN General Assembly, commonly referred to as the Paris Principles.⁴ However, the SHRC has never sought accreditation from the GANHRI and it is therefore not subject to any international oversight.

dismissing cases, and engaging with government and the United Nations (UN) in ways that primarily serve to enhance the government's image.

In 2023, MENA Rights Group, ALQST for Human Rights and the European Saudi Organisation for Human Rights (ESOHR) published a joint report (2023 SHRC Report)⁵ analysing the effectiveness of this institution and highlighting its role in whitewashing human rights violations in the country. Through a comprehensive analysis of its legal framework, composition, partnerships and actions, it found documented evidence of the institution's alignment with government's interests and its use as a mere tool to whitewash Saudi Arabia's human rights record.

This report aims complement the 2023 SHRC Report by presenting new, publicly available, evidence that demonstrate the continuing role of this institution in covering up human rights violations and to present itself as a spokesperson of the government of Saudi Arabia regarding human rights issues. To this day, no reform was undertaken to improve its independence and its effectiveness. Instead, the institution has focused its efforts on downplaying human rights violations,

⁴ UN General Assembly, *Principles relating to the Status of National Institutions (The Paris Principles)*, 20 December 1993, UN Doc. A/RES/48/134, available at: <https://www.ohchr.org/en/instruments-mechanisms/instruments/principles-relating-status-national-institutions-paris> (accessed on 14 August 2025).

⁵ MENA Rights Group, ALQST for Human Rights and the European Saudi Organisation for Human Rights (ESOHR), *The Saudi Human Rights Commission: A whitewashing tool of the Kingdom*, November 2023, available at: https://www.menarights.org/sites/default/files/2023-11/mrg-shrc_report.pdf (accessed on 21 August 2025).

The SHRC in a nutshell



The SHRC was established in 2005 by Royal Decree as the state's body tasked with promoting and protecting human rights in the Kingdom.⁶ According to its founding statute, the SHRC is mandated to review existing legislation, propose reforms, monitor detention facilities, handle complaints, and disseminate human rights awareness.⁷ The Commission has often described itself as an independent entity with full autonomy in carrying out its functions.⁸

⁶ Kingdom of Saudi Arabia, *Statute of the Human Rights Commission*, Royal Decree No. A/30, 12 September 2005, available at: <https://laws.boe.gov.sa/Files/Download/?attId=86943751-8f65-4a01-afee-adbb0103b5b7> (accessed on 22 August 2025), Article 1.

⁷ *Ibid.*, Article 5.

⁸ Kingdom of Saudi Arabia, *Initial report submitted under article 35 of the Convention on the Rights of Persons with Disabilities (CRPD/C/SAU/1)*, 19 October 2015, available at: <https://www.hrc.gov.sa/storage/reports-attachment/ETTD6SPWWzB9resbC6Y0h-FyhTbFRPN0NTD96hUNm.pdf> (accessed on 21 August 2025), para. 9; Committee against Torture (CAT), *Third periodic report submitted by Saudi Arabia under article 19 of the Convention against Torture (CAT/C/SAU/3)*, 27 February 2024, available at: <https://undocs.org/en/CAT/C/SAU/3> (accessed on 21 August 2025), para. 13; Kingdom of Saudi Arabia, *Statute of the Human Rights Commission*, issued by Royal Decree No. A/30 of 12 September 2005 (as amended), available at: <https://laws.boe.gov.sa/Files/Download/?attId=86943751-8f65-4a01-afee-adbb0103b5b7> (accessed on 21 August 2025), Article 2; Human Rights Commission (Saudi Arabia), *About the Commission* (website, Arabic), updated 27 January 2025, available at: <https://www.hrc.gov.sa/website/about-us> (accessed on 21 August 2025), section "نبذة عن الهيئة" (About the Commission), para. 1.

From its establishment in 2005, the SHRC's leadership—its president and board—is appointed by royal decree and approved by the Council of Ministers.⁹ This design inevitably subjects the institution to executive influence, undermining its independence.¹⁰ The Commission has not sought accreditation under the Paris Principles, which provide the global benchmark for independent national human rights institutions.¹¹ The absence of such accreditation reflects a lack of both formal and practical independence.

As will be discussed later in the present report, in its participation before international mechanisms, the SHRC highlights reforms and positive initiatives, such as new legislation on child protection or women's rights, while disregarding violations that persist in practice. For example, despite promised reforms on

⁹ Kingdom of Saudi Arabia, *Statute of the Human Rights Commission*, Royal Decree No. A/30, 12 September 2005, available at: <https://laws.boe.gov.sa/Files/Download/?attId=86943751-8f65-4a01-afee-adbb0103b5b7> (accessed on 22 August 2025), Article 3.

¹⁰ MENA Rights Group, ALQST for Human Rights and the European Saudi Organisation for Human Rights (ESOHR), *The Saudi Human Rights Commission: A whitewashing tool of the Kingdom*, November 2023, available at: https://www.menarights.org/sites/default/files/2023-11/mrg_shrc_report.pdf (accessed on 21 August 2025), p. 39.

¹¹ UN General Assembly, *Principles relating to the Status of National Institutions (The Paris Principles)*, 20 December 1993, UN Doc. A/RES/48/134, available at: <https://www.ohchr.org/en/instruments-mechanisms/instruments/principles-relating-status-national-institutions-paris> (accessed on 14 August 2025).

juvenile justice, minors continue to face the death penalty.¹² Rather than acknowledging these contradictions, the SHRC focuses on portraying the appearance of compliance, thereby shielding the authorities from scrutiny.

Throughout the years, the SHRC remained silent on credible and serious allegations of torture, arbitrary detention, and reprisals against human rights defenders.¹³ It has not carried out or published independent investigations, nor has it provided remedies for victims. Instead, the Commission often echoes official rhetoric by dismissing external criticism as interference in domestic affairs.¹⁴

The SHRC frequently engages in international cooperation with UN agencies and foreign partners, signing memoranda of understanding and publicising technical initiatives.¹⁵ While such activities are presented as evidence of progress, they are not matched by genuine oversight or accountability within the Kingdom. These engagements reinforce the Commission's role in legitimising government policies rather than challenging violations.

Unlike independent NHRIs, the SHRC does not publish substantive reports on detention conditions, systemic patterns of abuse, or case-specific investigations. Its outputs largely

describe state policies rather than assess their impact. The SHRC has also never established meaningful cooperation with domestic civil society organisations or provided a platform for victims to safely raise concerns.¹⁶

Taken together, these elements demonstrate that the SHRC lacks both independence and effectiveness. Instead of operating as a national mechanism of accountability, it reinforces official narratives, providing international legitimacy without addressing systemic violations. Its contribution remains symbolic and largely diplomatic, functioning as a tool for whitewashing rather than a guarantor of human rights.

¹² Amnesty International, *Saudi Arabia: Young men face imminent execution despite assurances on re-sentencing juveniles to prison terms*, 10 October 2022, available at: https://www.amnesty.org/en/latest/news/2022/10/saudi-arabia-young-men-face-imminent-execution-despite-assurances-on-re-sentencing-juveniles-to-prison-terms/?utm_source=chatgpt.com (accessed on 22 August 2025).

¹³ MENA Rights Group, ALQST for Human Rights and the European Saudi Organisation for Human Rights (ESOHR), *The Saudi Human Rights Commission: A whitewashing tool of the Kingdom*, November 2023, available at: https://www.menarights.org/sites/default/files/2023-11/mrg-shrc_report.pdf (accessed on 21 August 2025), pp. 12 ss.

¹⁴ *Ibid.*, pp. 12-25.

¹⁵ *Ibid.*, pp. 42-48.

¹⁶ *Ibid.*, pp. 28-30.

3. The human rights situation in Saudi Arabia in 2024-2025 and its portrayal by the SHRC

3.1 A continued crackdown on peaceful dissent and women's rights

In 2024-2025, the SHRC faced rising and imminent human rights challenges. One of the most pressing concerns stems from the continued crackdown on freedom of expression, where journalists, writers, human rights defenders, and ordinary citizens risk reprisals for peaceful criticism or dissent. Given its stated independence and responsibility to protect and promote human rights, the SHRC should serve as the primary reference point to hold the government accountable for such violations.

In theory, it should ensure effective monitoring, document infringements, and provide remedies that safeguard fundamental freedoms in line with Saudi Arabia's obligations under international human rights law. In reality, the SHRC's portrayal of human rights in Saudi Arabia is consistently selective and misleading. In public statements and on its website, the Commission highlights government achievements while ignoring the most significant human rights issues.

Over the past decade, Saudi Arabia has increasingly cracked down on any form of criticism of the government or dissent, and civic space started to become virtually

non-existent. However, in a surprising turn of events over the past year, the Saudi government has initiated a wave of releases of political prisoners, documented by submitting organisations, including high-profile human rights defenders. Since the beginning of 2025, at least 44 prisoners have been released, either after completing or still partway through serving prison sentences.¹⁷ Notable among these is Dr Mohammad Fahd al-Qahtani, founding member of Saudi Civil and Political Rights Association (ACPRA),¹⁸ Essa al-Nukheifi, a prominent anti-corruption activist,¹⁹ and Salma al-Shehab, a doctoral student at Leeds University.²⁰

¹⁷ Human Rights Watch, *Saudi Arabia: Dozens freed but arrests continue, many still held for peacefully exercising their rights*, 7 April 2025, available at: <https://www.hrw.org/news/2025/04/07/saudi-arabia-dozens-freed-arrests-continue> (accessed on 13 August 2025).

¹⁸ MENA Rights Group, *Mohammad al-Qahtani freed after decade of arbitrary detention*, 13 June 2019, available at: <https://menarights.org/en/caseprofile/human-rights-defender-mohammad-al-qahtani-remains-detention-saudi-arabia-despite> (accessed on 15 August 2025).

¹⁹ MENA Rights Group, *Saudi human rights defender released after 8 years in arbitrary detention*, 23 August 2019, available at: <https://menarights.org/en/caseprofile/essa-al-nukheifi-sentenced-six-years-prison-saudi-arabia-charges-related-human-rights> (accessed on 15 August 2025).

²⁰ MENA Rights Group, *Saudi academic Salma al-Shehab freed after 4 years in arbitrary detention*, 29 August 2019, available at: <https://menarights.org/en/case/salma-al-shehab> (accessed on 15 August 2025).



Abdullah Al-Hamid, Waleed Abu Alkhair, and Mohammad al-Qahtani in ACPRA trial sixth hearing session, 24 November 2012 © Racconish/Wikimedia Commons, licensed under CC BY-SA 3.0 DEED.

Although these releases should be commended as a positive step, they are still insufficient as they are accompanied by extensive restrictions, including travel bans of multiple years, surveillance, house arrest with an ankle monitor and ongoing threats of re-arrest. As more prisoners are released, travel bans have become an increasingly common tool of repression to silence human rights defenders. Meanwhile, the majority of prisoners of conscience still in detention, are subject to lengthy court-imposed travel bans that are usually as long as their prison sentence.²¹ Notable examples include Abdulrahman al-Sadhan, a humanitarian aid

worker who is currently serving 20 years in prison and a 20-year travel ban for publishing satirical post;²² or prominent human rights defender, Waleed Abu al-Khair,²³ who is currently serving a 15-year prison sentence and a 15-year travel ban.

Such travel bans are not always court-imposed but can also be “unofficial” travel bans, imposed without notification or any institutional order, which can also extend to family members of concerned individuals. Loujain al-Hathloul, arrested for protesting the driving ban on women and advocating

²¹ The duration of the travel ban starts to run right after the completion of the prison sentence, making the person subject to a double sentence that run consecutively. For more information on the use of travel bans in Saudi Arabia, see : ALQST for Human Rights, *Assault on Freedom of movement, the use of arbitrary travel bans in Saudi Arabia*, 16 July 2025, available at: <https://www.alqst.org/en/post/assault-on-freedom-of-movement-the-use-of-arbitrary-travel-bans-in-saudi-arabia> (accessed on 15 August 2025).

²² MENA Rights Group, *Employee of Saudi Red Crescent sentenced to 20 years in prison after three years of disappearance*, 14 April 2021, <https://menarights.org/en/caseprofile/employee-saudi-red-crescent-disappeared-al-mabahith-security-forces-march-2018> (accessed on 15 August 2025).

²³ MENA Rights Group, *Ten years after his arbitrary arrest, NGOs call for Saudi human rights defender Waleed Abu al-Khair to be released*, 15 April 2024, available at: <https://menarights.org/en/articles/ten-years-after-his-arbitrary-arrest-ngos-call-saudi-human-rights-defender-waleed-abu-al> (accessed on 15 August 2025).



Collage of pictures of Saudi individuals subjected to a travel ban, with a plane © Courtesy of ALQST.

for women's rights at the UN, was imprisoned and sentenced to a travel ban of 2 years and 10 months, which expired on 12 November 2023. Despite the expiration of the travel ban, she remained unable to travel, without having been formally notified of any justification or judicial decision.²⁴

Additionally, such releases are still an exception, and many remain imprisoned for acts that relate to their freedom of expression. In January 2024, women's rights activist Manahel al-Otaibi was sentenced in a secret trial by the Specialised Criminal Court to 11 years in prison, that was

²⁴ MENA Rights Group, ALQST for Human Rights, ESOHR and partners, *Saudi authorities must end misuse of administrative and judicial measures against released human rights defenders including Loujain al-Hathloul*, 31 October 2024, available at: <https://menarights.org/en/articles/saudi-authorities-must-end-misuse-administrative-and-judicial-measures-against-released> (accessed on 15 August 2025).

reduced to five years upon retrial in August 2025.²⁵ She was sentenced for advocating online for the abolition of the male guardianship laws and posting photos without an abaya. Her case drew international condemnation, but the SHRC remained silent, even as it represented Saudi Arabia before the UN Committee on the Elimination of Discrimination Against Women the same year. In official communications, the Commission celebrated Saudi "progress" and ignored her plight.²⁶

International human rights organisations have continued to document cases of arbitrary detention that are still ongoing.²⁷ In recent Opinions issued by the UN Working Group on Arbitrary Detention (UN WGAD), it reiterated its concern that there is a "widespread and systemic problem of arbitrary detention in Saudi Arabia" and that the "repeated violations of the rules of international law may constitute crimes against humanity."²⁸

²⁵ MENA Rights Group, *Saudi women's rights defender sentenced to 11 years in prison for social media activism*, 5 December 2023, available at: <https://menarights.org/en/case/manahel-al-otaibi> (accessed on 15 August 2025).

²⁶ The Guardian, *Saudi fitness instructor stabbed in face while jailed over women's rights posts*, 2 October 2024, available at: <https://www.theguardian.com/global-development/2024/oct/02/saudi-arabia-women-human-rights-influencer-manahel-al-otaibi-stabbed-face-abuse-prison> (accessed on 28 August 2025), noting that complaints to the SHRC about her prison abuse were ignored.

²⁷ Amnesty International, *Saudi Arabia: Authorities must free people who are arbitrarily detained for online expression ahead of Internet Governance Forum*, 28 November 2024, available at: <https://www.amnesty.org/en/latest/news/2024/11/saudi-arabia-authorities-must-free-people-who-are-arbitrarily-detained-for-online-expression-ahead-of-internet-governance-forum/> (accessed on 15 August 2025).

²⁸ UN WGAD, *Opinion No. 26/2024 concerning Saud bin Mohammed bin Ali al-Faraj (Saudi Arabia)**, 19 September 2024, UN doc. A/HRC/WGAD/2024/26, available at: <https://www.ohchr.org/sites/default/files/documents/issues/detention-wg/opinions/session99/a-hrc-wgad-26-2024-saudi-arabia-ae.pdf> (accessed on 15 August 2025).

In addition to those who remain detained, Saudi authorities continue to target and arbitrarily arrest government critics. In August 2024, British national Ahmed al-Doush was arrested at the airport in Riyadh and subsequently sentenced to eight years in prison. The charges against him related to deleted social media posts he had written six years earlier about the situation in Sudan – posts that made no reference to Saudi Arabia – and to an alleged association with a Saudi dissident in exile, with whom his only connection was acquaintance with the dissident's son.²⁹

Almost all documented cases of arbitrary detention relate to individuals who are prosecuted and sentenced based on the 2007 Anti-Cybercrime Law and the 2017 Law on Combating Terrorism Crimes and its financing (Counter-Terrorism Law). These laws have been repeatedly criticised by the UN for enabling the criminalisation of a wide spectrum of acts of peaceful expression and opinion.³⁰

The UN WGAD has repeatedly expressed its concern at the counter-terrorism legal framework by stating that it does not restrict

the acts it criminalises to violent acts.³¹ More recently, the UN Committee on the Elimination of Discrimination against Women also expressed its concern regarding the use of the Counter-Terrorism Law and the Anti-Cybercrime Law to target human rights defenders and activists, leading to intimidation, hate speech, threats, harassment, arrest detention and travel bans on women human rights defenders and activists, in particular those advocating for the abolishment of the male guardianship system and the travel bans.³²

3.2 A sharp rise in executions

The SHRC is confronted with urgent challenges related to the sharp rise in executions in the Kingdom in the years 2024 and 2025. Despite the growing international consensus towards restricting and abolishing the death penalty, Saudi Arabia has significantly expanded its use, including in cases that do not meet the threshold of the “most serious crimes” under international law. The SHRC has been repeatedly solicited and questioned at the international level, including during treaty body reviews and the Universal Periodic Review, to address this alarming trend and to demonstrate how it safeguards the right to life. However, the Commission has consistently failed to take a clear stance or to hold the government accountable.

²⁹ Amnesty International, *Saudi Arabia : British citizen Ahmed al-Doush receives a 10 year sentence*, 13 May 2025, available at: <https://www.amnesty.org.uk/press-releases/saudi-arabia-british-citizen-ahmed-al-doush-receives-10-year-sentence> (accessed on 15 August 2025).

³⁰ See, UN Special Procedures Mandate Holders, *OL SAU 12/2020*, 17 December 2020, <https://spcommreports.ohchr.org/TMResultsBase/DownloadPublicCommunicationFile?gld=25726> (accessed 15 August 2025), p. 6; Committee against Torture, *Concluding observations on the second periodic report of Saudi Arabia*, 8 June 2016, UN Doc. CAT/C/SAU/CO/2, available at: <https://docs.un.org/en/CAT/C/SAU/CO/2>, para 16 (accessed on 26 August 2025); MENA Rights Group, *Counter-terrorism practices incompatible with human rights in the MENA region*, 1 May 2025, available at: <https://www.menarights.org/en/articles/counter-terrorism-practices-incompatible-human-rights-mena-region> (accessed on 15 August 2025).

³¹ See for instance, UN WGAD, *Opinion No. 26/2024 concerning Saud bin Mohammed bin Ali al-Faraj (Saudi Arabia)**, 27 March 2024, available at: <https://documents.un.org/doc/undoc/gen/g24/093/34/pdf/g2409334.pdf> (accessed on 15 August 2025).

³² Committee on the Elimination of Discrimination Against Women, *Concluding Observations on the fifth periodic report of Saudi Arabia*, 29 October 2024, UN Doc. CEDAW/C/SAU/CO/5, https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=CEDAW%2FCO%2FSAU%2FCO%2F5&Lang=en (accessed on 7 February 2025).



Judge or auction gavel on Saudi Arabia waving flag background. © 3d illustration, licensed under Shutterstock.

Over the past few years, Saudi Arabia has seen a sharp increase in the number of executions carried out, especially against foreigners and for drug-related offenses³³ who receive death sentences following trials that routinely violate international standards.

In 2024, Saudi Arabia carried out the highest number of executions in its history, including for non-violent drug offenses. In that year only, Saudi Arabia executed 345 individuals,

including 138 foreign nationals,³⁴ and 122 solely based on drug-related charges. Most of those executed on these charges are foreign nationals.³⁵

According to the national press agency, between January 2014 and June 2025, Saudi Arabia executed 1 816 individuals, out of which

³³ L'Orient-Le jour, «Forte augmentation» des exécutions pour trafic de drogue en Arabie saoudite, 12 septembre 2024, available at : <https://www.lorientlejour.com/article/1426953/forte-augmentation-des-executions-pour-traffic-de-drogue-en-arabie-saoudite-ong.html> (accessed on 15 August 2025). Reprieve, *Record number of executions in Saudi Arabia in first six months of 2025 – mostly for drugs*, 7 July 2025, available at: <https://reprieve.org/uk/2025/07/07/record-number-of-executions-in-saudi-arabia-in-first-six-months-of-2025-mostly-for-drugs/> (accessed on 13 August 2025).

³⁴ European Saudi Organisation for Human Rights, *Blood Era: a historic record of executions in Saudi Arabia 2024*, 5 January 2025, pp. 2 and 9, available at: https://www.esohr.org/wp-content/uploads/2025/01/Blood_Era_A_Historic_Record_of_Executions_in_Saudi_Arabia_2024.pdf (accessed on 15 August 2025). Other statistics were documents by organisations such as Amnesty International, however the numbers provided by the European Saudi Organisation for Human Rights are the most recent ones. For statistics provided by Amnesty International, see Amnesty International, *Saudi Arabia: Highest execution toll in decades as authorities put to death 198 people*, 28 September 2024, available at: <https://www.amnesty.org/en/latest/news/2024/09/saudi-arabia-highest-execution-toll-in-decades-as-authorities-put-to-death-198-people/#:~:text=Executions%20for%20drug%2Drelated%20offences,in%20the%20country%20in%202023> (accessed on 15 August 2025).

³⁵ European Saudi Organisation for Human Rights, *Blood Era: a historic record of executions in Saudi Arabia 2024*, 5 January 2025, p. 15, available at: https://www.esohr.org/wp-content/uploads/2025/01/Blood_Era_A_Historic_Record_of_Executions_in_Saudi_Arabia_2024.pdf (accessed on 15 August 2025).

597 were executed for drug-related offences.³⁶ These statistics stand in stark contrast with the statements of Crown Prince of Saudi Arabia, Mohammed Bin Salman, who affirmed in a 2022 interview that the death penalty would only be applied for the crime of murder.³⁷

In December 2024, the UN Special Rapporteur on summary executions and on torture sent a communication to the Saudi government regarding the execution of three Egyptian nationals and the imminent execution of 29 other male foreign nationals, of whom 28 Egyptians, and one Jordanian.³⁸ Mandate holders expressed their alarm at these executions and confirmed that they do not meet the threshold of a “most serious crime.”³⁹

Executions continued into 2025 at an alarming pace, contradicting earlier government statements that the death penalty for such crimes would be curtailed. As of 27 August 2025, Saudi authorities have carried out 269

executions since the beginning of the year.⁴⁰ Between January and June 2025, at least 118 people were executed for drug related offences, setting it to be the highest on record.⁴¹ Another Egyptian national was later executed in April 2025,⁴² and in June 2025, UN experts warned against the imminent execution of 26 Egyptians.⁴³

Yet in its public reporting, the SHRC has consistently avoided addressing the issue. Instead, it promotes training workshops and legal awareness campaigns, while those facing execution — including juveniles — remain without institutional protection.

International organisations have also documented an alarming use of the death penalty against members of the Saudi Shi’a minority, mainly for trumped-up terrorism offences. According to Amnesty International,

³⁶ Amnesty International, *Saudi Arabia: New report denounces alarming escalation in executions including of foreign nationals convicted of drug-related offences*, 7 July 2025, available at: <https://www.amnesty.org/en/latest/news/2025/07/saudi-arabia-escalation-executions-foreign-nationals-drug-related-offences/> (accessed on 15 August 2025).

³⁷ The Atlantic, *Absolute Power*, 3 March 2022, available at: <https://www.theatlantic.com/magazine/archive/2022/04/mohammed-bin-salman-saudi-arabia-palace-interview/622822/> (accessed on 15 August 2025).

³⁸ UN Special Procedures, *UA SAU 5/2024*, 3 December 2024, available at: <https://spcommreports.ohchr.org/TMResultsBase/DownloadPublicCommunicationFile?gld=29550> (accessed on 15 August 2025).

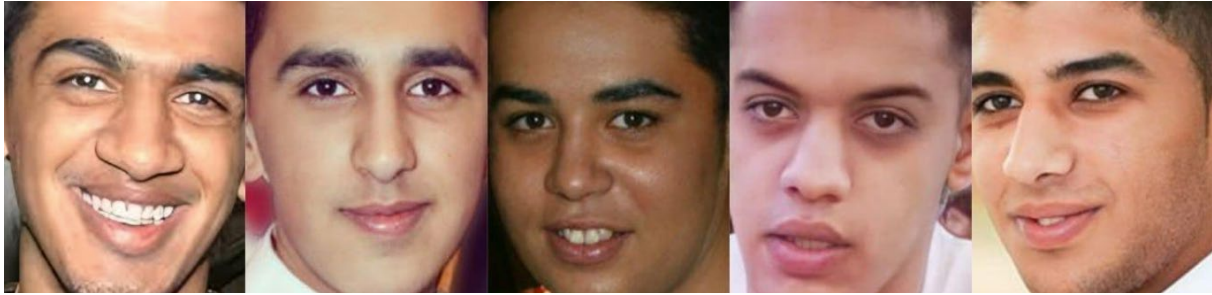
³⁹ *Ibid.*, p. 4.

⁴⁰ The number of executions is monitored and documented by ESOHR and is the most recent one at the time of publication of this report. For earlier statistics, you may consult: Human Rights Watch, *Saudi Arabia: Executions surge in 2025, execution of journalist suggests use of death penalty to crush dissent*, 11 August 2025, available at: <https://www.hrw.org/news/2025/08/11/saudi-arabia-executions-surge-in-2025> (accessed on 15 August 2025); Reprieve, *Record number of executions in Saudi Arabia in first six months of 2025 – mostly for drugs*, 7 July 2025, available at: <https://reprieve.org/uk/2025/07/07/record-number-of-executions-in-saudi-arabia-in-first-six-months-of-2025-mostly-for-drugs/> (accessed on 13 August 2025).

⁴¹ Amnesty International, *Saudi Arabia: “If We Had Money and a Lawyer, Maybe My Brother Would Be Alive”: Saudi Arabia’s Execution Crisis*, 7 July 2025, available at: <https://www.amnesty.org/en/documents/mde23/9524/2025/en/> (accessed on 15 August 2025), p. 24.

⁴² MENA Rights Group, *An Egyptian national, Farhat Abu al-Saud, was executed in Saudi Arabia*, 25 April 2025, available at: <https://menarights.org/en/case/farhat-fathi-abdel-maksoud-abu-al-saud> (accessed on 18 August 2025).

⁴³ OHCHR, *UN expert urges Saudi Arabia to halt imminent execution of 26 Egyptian nationals for drug-related offences*, 10 June 2025, available at: <https://www.ohchr.org/en/press-releases/2025/06/un-expert-urges-saudi-arabia-halt-imminent-execution-26-egyptian-nationals> (accessed on 18 August 2025).



Pictures of the five minors, from left to right: Jawad Qureiris, Youssef Al Manasif, Hassan Al Faraj, Jalal Labbad, Abdallah Al Derazi. © Courtesy of ESOHR.

Saudi authorities have executed at least 120 members of the Shi'a community between January and June 2025, nearly all of them for terrorism-related offences.⁴⁴ Members of the Shi'a community in Saudi Arabia have long faced discrimination in various areas, such as education, the justice system, religious freedoms and employment.⁴⁵ The longstanding discrimination faced by this community undoubtedly forms the background of these death sentences.

On 15 November 2024, the UN WGAD adopted an Opinion regarding five members of the Shi'a minority sentenced to death for acts committed as minors, and considered that there is a concerning pattern of persecution and long-standing history of discrimination against the Shi'a religious minority in the Qatif region.⁴⁶ Considering that the five individuals

belong to the Shi'a minority and that their sentences are linked to their participation in the protest movement taking place in 2011 in the mainly Shi'a Eastern Province, the UN WGAD found their detention to be discriminatory on religious grounds. This finding echo recent concerns raised by the UN Committee on the Elimination of Racial Discrimination on the "significant increase in the rate of executions carried out since 2023, in particular among members of the Shia ethno-religious minority group."⁴⁷

On 21 August 2025, one of the defendants, Jalal Labbad, was tragically executed by Saudi authorities, thereby violating recommendations made by both the WGAD and the CERD.⁴⁸

⁴⁴ Amnesty International, *Saudi Arabia: "If We Had Money and a Lawyer, Maybe My Brother Would Be Alive": Saudi Arabia's Execution Crisis*, 7 July 2025, available at : <https://www.amnesty.org/en/documents/mde23/9524/2025/en/> (accessed on 15 august 2025), p. 17.

⁴⁵ For a more detailed report on the systemic discrimination faced by Shi'a muslims in Saudi Arabia, see MENA Rights Group, *Discrimination against minorities in Saudi Arabia: report to the UN CERD*, 21 November 2024, available at: <https://menarights.org/en/documents/discrimination-against-minorities-saudi-arabia-report-un-cerd> (accessed on 15 August 2025).

⁴⁶ UN WGAD, *Opinion No. 71/2024 concerning Abdullah al-Derazi, Jalal al-Labbad, Yusuf Muhammad Mahdi al-Manasif, Jawad Abdullah Qureiris and Hassan Zaki al-Faraj (Saudi Arabia)*, 15 November 2024, UN Doc. A/HRC/WGAD/2024/71, available at: <https://www.ohchr.org/sites/default/files/documents/issues/detention-wg/opinions/session101/a-hrc-wgad-2024-71-saudi-arabia-advance-edited.pdf> (accessed on 15 August 2025).

⁴⁷ UN Committee on the Elimination of Racial Discrimination, *Concluding observations on the combined tenth and eleventh periodic reports of Saudi Arabia*, 24 December 2024, UN Doc. CERD/C/SAU/CO/10-11, available at: https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=CERD%2FC%2FSAU%2FCO%2F10-11&Lang=en (accessed on 12 March 2025), para. 25. Findings of the Committee will be later discussed in the report under section (4.3).

⁴⁸ Amnesty International, *Saudi Arabia: Deplorable execution exposes broken promise to halt death penalty for juveniles*, 22 August 2025, available at: <https://www.amnesty.org/en/latest/news/2025/08/saudi-arabia-deplorable-execution-exposes-broken-promise-to-halt-death-penalty-for-juveniles/> (accessed on 27 August 2025).

4. The SHRC as the voice of the Saudi government at the UN

4.1 Universal Periodic Review

On 22 January 2024, Saudi Arabia's human rights record was examined before the UN Human Rights Council (HRC) during the country's fourth Universal Periodic Review (UPR).⁴⁹ The UPR is a peer-review mechanism by which UN Member States make recommendations to the country under review on how to improve its human rights record in light of the country's international

obligations.⁵⁰ Saudi Arabia received 354 recommendations from 135 States.⁵¹ On 4 July 2024, Saudi Arabia informed the HRC of its decision to accept 83% of recommendations made during its UPR.⁵²

⁴⁹ UN Web TV, *Saudi Arabia Review – 45th Session of Universal Periodic Review*, 22 January 2024, available at: <https://webtv.un.org/en/asset/k1q/k1q9kupguy> (accessed on 19 August 2025).

⁵⁰ UN Human Rights Council, *Universal Periodic Review*, available at: <https://www.ohchr.org/en/hr-bodies/upr/upr-home> (accessed on 19 August 2025).

⁵¹ UN Human Rights Council, *Report of the Working Group on the Universal Periodic Review (Saudi Arabia)*, 14 March 2024, UN Doc. A/HRC/56/4, available at: <https://docs.un.org/en/A/HRC/56/4> (accessed on 18 August 2025).

⁵² UN Human Rights Council, *Report of the Working Group on the Universal Periodic Review* Kingdom of Saudi Arabia Addendum Views on conclusions and/or recommendations, voluntary commitments and replies presented by the State under review*, 1 July 2024, UN Doc. A/HRC/56/4/Add.1, available at: https://www.ohchr.org/en/hr-bodies/upr/sa-index?utm_source=chatgpt.com (accessed on 19 August 2025).

Ms. Hala al-Tuwaijri, President of the Saudi Human Rights Commission, speaks on behalf of the Saudi delegation during the Universal Periodic Review at the UN Human Rights Council. © Courtesy of MENA Rights Group.



During Saudi Arabia's UPR in January 2024, and adoption of the outcome in July 2024 – both held in Geneva – the country's delegation was led by Ms. Hala al-Tuwaijri, President of the SHRC, accompanied by several SHRC members. Although the SHRC is meant to function separately from the government,⁵³ its role in chairing the official delegation illustrates how closely it is tied to state authorities, clearly undermining its independence.

In fact, the Paris Principles stress that NHRIs should not act as part of a state delegation in processes such as the Universal Periodic Review or other UN Treaty Body sessions where they have separate rights of participation.⁵⁴

During the review, Chile addressed this issue by recommending that Saudi Arabia take measures to ensure its NHRI operates in full accordance with the Paris Principles – a

recommendation that was later accepted.⁵⁵

The statements made by the SHRC during the UPR sharply contradict the findings of human rights organisations, highlighting how the Commission functions less as an independent watchdog and more as a tool of the Saudi authorities to whitewash their human rights record.

Freedom of expression and opinion

In her opening statement, the SHRC President asserted that Saudi Arabia's Basic Law protects freedom of opinion and expression, and that any allegations of rights violations are reviewed by the judicial system and the SHRC itself. She further argued that restrictions on media, when imposed, are justified on the grounds of preserving public order.⁵⁶

In reality, authorities possess broad powers to define and control speech deemed a threat to "state security."⁵⁷ Over the past decade,

⁵³ Kingdom of Saudi Arabia, *Initial report submitted under article 35 of the Convention on the Rights of Persons with Disabilities (CRPD/C/SAU/1)*, 19 October 2015, available at: <https://www.hrc.gov.sa/storage/reports-attachment/ETTD6SPWWzB9resbC6Y0h-FyhTbFRPN0NTD96hUNm.pdf> (accessed on 21 August 2025), para. 9; Committee against Torture (CAT), *Third periodic report submitted by Saudi Arabia under article 19 of the Convention against Torture (CAT/C/SAU/3)*, 27 February 2024, available at: <https://undocs.org/en/CAT/C/SAU/3> (accessed on 21 August 2025), para. 13; Kingdom of Saudi Arabia, *Statute of the Human Rights Commission*, issued by Royal Decree No. A/30 of 12 September 2005 (as amended), available at: <https://laws.boe.gov.sa/Files/Download/?attId=86943751-8f65-4a01-afee-adbb0103b5b7> (accessed on 21 August 2025), Article 2; SHRC, *About the Commission* (website, Arabic), updated 27 January 2025, available at: <https://www.hrc.gov.sa/website/about-us> (accessed on 21 August 2025), section "نبذة عن الهيئة" (About the Commission), para. 1.

⁵⁴ UN General Assembly, *Principles relating to the Status of National Institutions (The Paris Principles)*, 20 December 1993, UN Doc. A/RES/48/134, available at: <https://www.ohchr.org/en/instruments-mechanisms/instruments/principles-relating-status-national-institutions-paris> (accessed 14 August 2025).

⁵⁵ UN Human Rights Council, *Report of the Working Group on the Universal Periodic Review (Saudi Arabia)*, 14 March 2024, UN doc. A/HRC/56/4, available at: <https://docs.un.org/en/A/HRC/56/4> (accessed on 18 August 2025), Recommendation 43.72: "Take steps to ensure that the national Human Rights Commission fully complies with the principles relating to the status of national institutions for the promotion and protection of human rights (the Paris Principles) (Chile)". UN Human Rights Council, *Report of the Working Group on the Universal Periodic Review (Saudi Arabia)*, 14 March 2024, UN Doc. A/HRC/56/4, available at: <https://docs.un.org/en/A/HRC/56/4> (accessed on 18 August 2025).

⁵⁶ Her full statement is available on UN Web TV, *Saudi Arabia Review – 45th Session of Universal Periodic Review*, 22 January 2024, available at: <https://webtv.un.org/en/asset/k1q/k1q9kupguv> (accessed on 19 August 2025).

⁵⁷ MENA Rights Group, *The Saudi Presidency of State Security: An Arm of Repression in the Crown Prince's Kingdom*, 21 June 2022, available at: <https://www.menarights.org/en/documents/saudi-presidency-state-security-arm-repression-crown-princes-kingdom> (accessed on 15 August 2025).

provisions in the Anti-Cybercrime Law and the Counter-Terrorism Law have frequently been used to arbitrarily arrest and detain peaceful critics on social media,⁵⁸ an issue that the SHRC did not address during the UPR. In practice, this legislation has been repeatedly invoked to hand down harsh prison terms and even death sentences to peaceful activists, political opponents, and women human rights defenders; and yet no mention of it was made by the SHRC.

In response to these practices, 21 states recommended that Saudi Arabia strengthen protections for freedom of expression. Ghana, for example, urged the Kingdom to “enhance its efforts to promote freedom of opinion and expression, both online and offline, in accordance with international human rights law.”⁵⁹

Several countries also specifically called for reforms to the Anti-Cybercrime Law. Switzerland recommended that Saudi Arabia “amends the Basic Law, [...] and the Anti-Cyber Crime Law to bring them into line with international standards on the right to freedom of expression.”⁶⁰ Likewise, New Zealand advised that Saudi Arabia “ensures the use of social media for peaceful expression is not criminalised.”⁶¹

During the review, Saudi Arabia received 11 recommendations urging reforms to its counter-terrorism framework.⁶²

The United Kingdom also raised concerns, advising that the jurisdiction of the Specialised Criminal Court be limited to genuine terrorism cases and that access be granted for diplomats and journalists to observe such trials.⁶³

The prohibition of torture and death penalty

During the review, the SHRC claimed that torture is absolutely forbidden in the Kingdom, with perpetrators facing at least a 10-year prison term. It also insisted that Saudi Arabia complies with international standards on the death penalty and noted that capital punishment for minors had been abolished.⁶⁴

In reality, torture remains a common practice, particularly against peaceful activists and human rights defenders.⁶⁵ It is frequently used

⁵⁸ See notably, MENA Rights Group, *Counter-terrorism practices incompatible with human rights in the MENA region*, 1 May 2025, available at: <https://www.menarights.org/en/articles/counter-terrorism-practices-incompatible-human-rights-mena-region> (accessed on 15 August 2025).

⁵⁹ UN Human Rights Council, *Report of the Working Group on the Universal Periodic Review (Saudi Arabia)*, 14 March 2024, UN doc. A/HRC/56/4, available at: <https://docs.un.org/en/A/HRC/56/4> (accessed on 18 August 2025), Recommendation 43.143.

⁶⁰ *Ibid.*, Recommendations 43.119; 43.120; 43.123; 43.148; 43.151.

⁶¹ *Ibid.*, Recommendation 43.123.

⁶² *Ibid.*, Recommendations 43.109; 43.112; 43.119; 43.120; 43.121; 43.122; 43.123; 43.124; 43.125; 43.148; 43.151.

⁶³ *Ibid.*, Recommendation 43.112.

⁶⁴ Kingdom of Saudi Arabia, *National report submitted in accordance with Human Rights Council resolutions 5/1 and 16/21 (A/HRC/WG.6/45/SAU/1)*, 13 November 2023, available at: https://upr-info.org/sites/default/files/country-document/2024-06/A_HRC_WG.6_45_SAU_1_E.pdf (accessed on 21 August 2025), para. 19; United Nations Human Rights Council, *Report of the Working Group on the Universal Periodic Review: Saudi Arabia (A/HRC/56/4)*, 14 March 2024, available at: <https://documents.un.org/access.nsf/get?DS=A/HRC/56/4&Lang=E> (accessed on 21 August 2025), para. 34; United Nations Human Rights Council, *Report of the Working Group on the Universal Periodic Review: Saudi Arabia (A/HRC/56/4)*, 14 March 2024, available at: <https://documents.un.org/access.nsf/get?DS=A/HRC/56/4&Lang=E> (accessed on 21 August 2025), para. 11.

⁶⁵ Amnesty International, *Saudi Arabia: Further Information: Manahel al-Otaibi Subjected to Torture in Saudi Prison*, 6 September 2024, available at: <https://www.amnesty.org/en/documents/mde23/8490/2024/en/> (accessed on 19 August 2025).

to extract coerced confessions, which are then admitted as the sole basis for convictions. Allegations of torture are routinely ignored or concealed by the SHRC.⁶⁶

Despite official assurances given by the SHRC during the past few years⁶⁷ and during the opening statement at the UPR, Saudi authorities continue to impose death sentences on people who were under 18 at the time of their alleged offenses. At least eight such individuals are currently on death row, with one facing imminent execution.⁶⁸

As a result, Saudi Arabia received 15 recommendations addressing the prohibition of torture. Costa Rica urged the Kingdom to carry out independent and effective investigations into torture claims, while Togo called for the explicit inclusion of the crime of torture – consistent with article 1 of the UN Convention against Torture (UNCAT) – within Saudi law. Croatia and others further advised ratification of the Optional Protocol to the UNCAT.

The Kingdom also received 35 recommendations on the death penalty. Argentina recommended explicitly banning death sentences for minors, whereas Paraguay and sever-

al other states encouraged Saudi Arabia to adopt an official moratorium as a step toward full abolition.

Adoption of the outcome

During the adoption of the outcome on 4 July 2024, the SHRC was once again heading the Saudi delegation and was entrusted with the role of “accepting” or “noting”⁶⁹ recommendations on behalf of the government.⁷⁰ It therefore took on the role to reject many key recommendations that pertain to the most pressing human rights issues in Saudi Arabia.⁷¹ This shows a clear disregard from the SHRC to address the most significant recommendations regarding its crackdown on human rights defenders, brushing them aside as “unfounded allegations” despite overwhelming evidence to the contrary.⁷²

The SHRC, acting on behalf of the government of Saudi Arabia, only “noted” recommendations to ratify key international treaties, including the International Covenant on Civil and Political

⁶⁶ MENA Rights Group, ALQST for Human Rights and the European Saudi Organisation for Human Rights (ESOHR), *The Saudi Human Rights Commission: A whitewashing tool of the Kingdom*, November 2023, available at: https://www.menarights.org/sites/default/files/2023-11/mrg_shrc_report.pdf (accessed on 21 August 2025).

⁶⁷ Amnesty International, *Young men face imminent execution despite assurances on re-sentencing juveniles to prison terms*, 10 October 2022, available at: https://www.amnesty.org/en/latest/news/2022/10/saudi-arabia-young-men-face-imminent-execution-despite-assurances-on-re-sentencing-juveniles-to-prison-terms/?utm_source=chatgpt.com (accessed on 27 August 2025); see also, statement published by the SHRC on X, available at: https://x.com/HRCSaudi_EN/status/1318935445284278273?s=19 (accessed on 27 August 2025).

⁶⁸ This number is provided from the documentation of ESOHR at the time of publication.

⁶⁹ UN Human Rights Council, *Report of the Working Group on the Universal Periodic Review* Kingdom of Saudi Arabia Addendum Views on conclusions and/or recommendations, voluntary commitments and replies presented by the State under review*, 1 July 2024, UN Doc. A/HRC/56/4/Add.1, available at: https://www.ohchr.org/en/hr-bodies/upr/sa-index?utm_source=chatgpt.com (accessed on 19 August 2025).

⁷⁰ UN Web TV, *26th Meeting - 56th Regular Session of Human Rights Council*, 4 July 2024, available at: <https://webtv.un.org/en/asset/k1t/k1tt6njldu> (accessed on 19 August 2025).

⁷¹ MENA Rights Group, ALQST for Human Rights, ESOHR and partners, *International access will be needed to follow up on mixed Saudi response to UPR recommendations*, 23 July 2024, available at: <https://menarights.org/en/articles/international-access-will-be-needed-follow-mixed-saudi-response-upr-recommendations> (accessed on 22 August 2025).

⁷² United Nations Human Rights Council, *56th session, 26th meeting: Adoption of the outcome of the Universal Periodic Review of Saudi Arabia*, 4 July 2024, available at: <https://webtv.un.org/en/asset/k1t/k1tt6njldu> (accessed on 22 August 2025).

Rights (ICCPR) and the Optional Protocol to the UNCAT. It merely accepted recommendations to “consider” ratifying them.

The SHRC only “noted” some recommendations to abolish the death penalty and most concerning its counter-terrorism law. This raises serious concerns considering Saudi Arabia has one of the highest execution rates worldwide, and many death sentences are imposed under the Counter-Terrorism Law, as was discussed under Section 3.2 of this report.

The SHRC also flatly rejected all recommendations related to human rights defenders. For example, it dismissed Belgium’s recommendation to “refrain from reprisals against human rights defenders for interactions with United Nations human rights mechanisms” as “unfounded allegations.” The SHRC rejected Luxembourg’s call to “release all demonstrators, human rights defenders and journalists detained for

exercising their freedom of expression,” again labelling it “unfounded” in their statement. The SHRC also rejected the Netherlands’ recommendation to “repeal travel bans for human rights defenders who have completed their prison sentences,” dismissing it as another “unfounded allegation.”

4.2 UN Committee on the Elimination of Discrimination Against Women (CEDAW)

On 9 October 2024, the UN CEDAW examined Saudi Arabia’s record during its fifth periodic review. Following its review, the Committee issued its Concluding Observations on the country’s record regarding the protection of women’s rights on 29 October 2024, identifying more than 20 areas of concern with regards to Saudi Arabia’s implementation its obligations under the Convention on the Elimination of

Room where the review of Saudi Arabia by the CEDAW took place. © Courtesy of MENA Rights Group.



All Forms of Discrimination against Women (CEDAW Convention), which the country ratified in 2000.⁷³

The Saudi delegation representing the Saudi government was once again headed by President of the SHRC, Ms. Hala al-Tuwaijri. The CEDAW also addressed a recommendation in that regard and urged the State party to ensure the independence of the SHRC.⁷⁴

Throughout their statement, the SHRC painted a positive and progressive image of the advancement of women's rights in the country.⁷⁵ In particular, it claimed substantive progress in women's legal equality, pointing to reforms such as increased access to education, lifting of the driving ban on women, employment, and legal services.⁷⁶

While the appearance of progress exists, deep structural issues remain. Saudi Arabia's legal system continues to enforce a general reservation to the CEDAW Convention, allowing the Sharia to override contradictory provisions, which is incompatible with the Convention's intent. The male guardianship system – though partially relaxed – still severely restricts women's autonomy in personal status, travel, marriage, and legal

matters.⁷⁷ The Committee has repeatedly criticised these entrenched discriminatory norms across laws governing labour, nationality, civil status, and personal rights.⁷⁸

The SHRC emphasised its control and monitoring of women's rights advancements and celebrates its leadership roles in international forums – implicitly suggesting credibility and progress. Women who publicly campaigned for reform, such as Manahel al-Otaibi, are still arrested, tortured, and silenced. The SHRC's response to international concerns about these activists was defensive, dismissing criticism as interference and failing to address credible allegations – including keeping silent on torture claims.

In stark contrast with the Saudi delegation's claim that there is “no restriction on the freedom of movement of any individual, except by law or judicial sentence”, human rights organisations have documented Saudi Arabia's use of arbitrary and unofficial travel bans imposed on human rights defenders and their families, sometimes without a court order.⁷⁹ For example, Saudi women's rights

⁷³ UN Committee on the Elimination of Discrimination against Women, *Concluding observations on the fifth periodic report of Saudi Arabia**, 30 October 2024, UN Doc. CEDAW/C/SAU/CO/5, available at: https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=CE-DAW%2FC%2FSAU%2FCO%2F5&Lang=en (accessed on 18 August 2025).

⁷⁴ *Ibid.*, paras. 23-24.

⁷⁵ United Nations Office at Geneva, *Meeting summary: Experts of the Committee on the Elimination of Discrimination against Women (CEDAW) review Saudi Arabia*, 9 October 2024, available at: <https://www.ohchr.org/en/meeting-summaries/2024/10/experts-committee-elimination-discrimination-against-women-praise-saudi> (accessed on 22 August 2025).

⁷⁶ *Ibid.*

⁷⁷ Amnesty International, *Saudi Arabia: End Male Guardianship and Discrimination against Women*, 8 March 2023, available at: <https://www.amnesty.org/en/documents/mde23/6517/2023/en/> (accessed on 18 August 2025).

⁷⁸ UN Committee on the Elimination of Discrimination against Women, *Concluding Observations on the fifth periodic report of Saudi Arabia**, 30 October 2024, UN Doc. CEDAW/C/SAU/CO/5, available at: https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=CE-DAW%2FC%2FSAU%2FCO%2F5&Lang=en (accessed on 18 August 2025).

⁷⁹ For more information on the use of travel bans in Saudi Arabia, see: ALQST for Human Rights, *Assault on Freedom of movement, the use of arbitrary travel bans in Saudi Arabia*, 16 July 2025, available at: <https://www.alqst.org/en/post/assault-on-freedom-of-movement-the-use-of-arbitrary-travel-bans-in-saudi-arabia> (accessed on 15 August 2025). You may also visit the #LetThemFly campaign launched by Amnesty international, available at: <https://www.amnesty.org/en/petition/end-travel-bans-on-activists-in-saudi-arabia/> (accessed on 18 August 2025).



Screenshot of Lina al-Hathloul, sister of Loujain al-Hathloul speaking at the review of Saudi Arabia by the CEDAW. © UN Web TV.

activist Loujain al-Hathloul was sentenced to a travel ban of two years and ten months after being released from prison in 2021 as part of her conviction. While her travel ban formally ended on 13 November 2023, she attempted to travel in February 2024 and was told at the border that she remained under a permanent travel ban. Her family is also subject to a travel ban from 2018 without any judicial order.

4.3 UN Committee on the Elimination of Racial Discrimination (CERD)

Saudi Arabia's human rights record was reviewed by the UN CERD on 27 and 28 November 2024.⁸⁰ Once again, the Saudi delegation in Geneva was led by Ms. Hala al-Tuwaijri, the SHRC's President, posing the

same problems as discussed under the UPR section.⁸¹

Following an interactive dialogue with the SHRC, the Committee adopted its Concluding Observations on 10 December 2024, identifying more than 20 areas of concern with regards to Saudi Arabia's implementation of its obligations under the Convention on the Elimination of Racial Discrimination, which it ratified in 1997.⁸² In its Concluding Observations, the UN CERD urged Saudi Arabia to set up a genuinely independent human rights institution within a specific timeframe.⁸³

⁸⁰ United Nations Office at Geneva, *Meeting summary: Experts of the Committee on the Elimination of Racial Discrimination welcome steps taken by Saudi Arabia to address discrimination*, 28 November 2024, available at: <https://www.ohchr.org/en/meeting-summaries/2024/11/experts-committee-elimination-racial-discrimination-welcome-steps-taken> (accessed on 22 August 2025).

⁸¹ SHRC, *Opening Statement*, 27 November 2024, available at: https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=INT%2FCERD%2FSTA%2FSAU%2F60478&Lang=en (accessed on 18 August 2025).

⁸² UN Committee on the Elimination of Racial Discrimination, *Concluding Observations on the combined tenth and eleventh periodic reports of Saudi Arabia**, 24 December 2024, UN Doc. CERD/C/SAU/CO/10-11, available at: https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=CERD%2FC%2FSAU%2FCO%2F10-11&Lang=en (accessed on 18 August 2025), paras. 11-12.

⁸³ *Ibid.*



Screenshot of Hala al-Tuwaijri, president of the SHRC, delivering her opening statement at the review of Saudi Arabia by the CERD. © UN Web TV.

Rights of the Shi'a minority and Huwaitat tribe

During its interactive dialogue, the SHRC asserted on multiple occasions that domestic laws prohibit discrimination based on ethnicity or origin.⁸⁴ In reality, the Kingdom lacks a comprehensive anti-discrimination framework, with no specific legislation criminalising racial discrimination. This poor legal framework was not raised by the SHRC in its statement, which was instead dedicated to praising the current legal framework in Saudi Arabia that protects equality. Although articles 8 and 47 of the Basic Law of Governance guarantee equality, these provisions are in reality poorly enforced and insufficient to protect minorities.

⁸⁴ United Nations Office at Geneva, *Meeting summary: Experts of the Committee on the Elimination of Racial Discrimination welcome steps taken by Saudi Arabia to address discrimination*, 28 November 2024, available at: <https://www.ungeneva.org/en/news-media/meeting-summary/2024/11/examen-de-larabie-saoudite-au-cerd-la-situation-des-non-citoyens> (accessed on 22 August 2025), noting the delegation's claim that "the Kingdom's laws prohibited any discrimination on the grounds of ethnicity or origin that undermined fundamental freedoms."

Furthermore, the 2017 Counter-Terrorism Law is disproportionately used to target religious minorities such as Shi'a Muslims. The absence of a codified Penal Code gives judges wide discretion, often resulting in arbitrary and discriminatory rulings.⁸⁵ The Committee therefore called on Saudi Arabia to adopt comprehensive anti-discrimination legislation that defines racial discrimination broadly and addresses structural, direct, indirect, and intersecting forms of inequality.⁸⁶

⁸⁵ For a more detailed report on the systemic discrimination faced by Shi'a Muslims, see MENA Rights Group, *Discrimination against minorities in Saudi Arabia: report to the UN CERD*, 21 November 2024, available at: <https://menarights.org/en/documents/discrimination-against-minorities-saudi-arabia-report-un-cerd> (accessed on 15 August 2025).

⁸⁶ UN Committee on the Elimination of Racial Discrimination, *Concluding Observations on the combined tenth and eleventh periodic reports of Saudi Arabia*, 24 December 2024, UN Doc. CERD/C/SAU/CO/10-11, available at: <https://docs.un.org/en/CERD/C/SAU/CO/10-11> (accessed on 22 August 2025), para. 16.



Stuttgart, Germany - 10-01-2022: Cellphone with logo of Saudi Arabian property developer NEOM Company on screen in front of website. Focus on center-left of phone display. Unmodified photo. © T. Schneider, licensed under Shutterstock.

The SHRC also maintained that discrimination against Shi'a Saudis was prohibited and that they fully enjoy their rights and freedoms.⁸⁷ However, the Committee reported a very different reality. It noted systemic discrimination against the Shi'a community, citing cases of harassment, intimidation, arbitrary arrests, and reprisals against activists, journalists, and human rights defenders advocating for minority rights.⁸⁸ Shi'a citizens face barriers in obtaining permits to build places of worship and lack visibility in official data on their socio-economic conditions. The Committee further criticised

their persistent marginalisation, particularly their underrepresentation in the judiciary, law enforcement, and public administration.

The Saudi delegation claimed that the Kingdom is committed to respecting international commitments related to the death penalty and that it only applies for capital crimes after appropriate evidence was gathered. The SHRC also claimed that executions are carried out only in line with international standards and after due process.⁸⁹ In stark contrast with these claims, the Committee highlighted the disproportionate application of the death penalty in Saudi Arabia. It highlighted the disproportionate targeting of vulnerable groups – including Shi'a minorities, migrant workers, and domestic workers, especially women – who

⁸⁷ UN Committee on the Elimination of Racial Discrimination, *Summary record of the 114th session, 28 November 2024*, UN Doc. CERD/C/SR.3112, available at: <https://docs.un.org/en/CERD/C/SR.3112> (accessed on 22 August 2025), where the delegation stated that “Shiites [...] were protected against discrimination under national law.”

⁸⁸ UN Committee on the Elimination of Racial Discrimination, *Concluding Observations on the combined tenth and eleventh periodic reports of Saudi Arabia**, 24 December 2024, UN Doc. CERD/C/SAU/CO/10-11, available at: https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=CERD%2FC%2FSAU%2FCO%2F10-11&Lang=en (accessed on 18 August 2025), paras. 35 ss.

⁸⁹ United Nations Office at Geneva, *Meeting summary: Experts of the Committee on the Elimination of Racial Discrimination welcome steps taken by Saudi Arabia to address discrimination*, 28 November 2024, available at: <https://www.ohchr.org/en/meeting-summaries/2024/11/experts-committee-elimination-racial-discrimination-welcome-steps-taken> (accessed on 22 August 2025), noting that “the death penalty was only applied for capital crimes after appropriate evidence was gathered.”

are more likely to face arbitrary detention, torture, and unfair trials.⁹⁰ The Committee recommended that Saudi Arabia impose an immediate moratorium on the death penalty with the ultimate goal of abolition, in line with its international obligations.⁹¹

Finally, it must be noted that, although it was raised by the Committee during its interactive dialogue and in its Concluding Observations, the SHRC did not raise at any point the situation of the Huwaitat Bedouin tribe who have faced forced displacement to make way for the NEOM project.⁹² The SHRC instead, ignored the issue and continued praising the current legal framework in Saudi Arabia. Members of the Huwaitat tribe have faced forced displacement, arbitrary detention, and harsh prosecutions for their opposition to the evictions, with many subjected to excessive violence, including the extrajudicial killing of Abdul Rahim al-Huwaiti.⁹³

⁹⁰ CERD, *Concluding Observations on the combined tenth and eleventh periodic reports of Saudi Arabia**, 24 December 2024, UN Doc. CERD/C/SAU/CO/10-11, available at: https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=CERD%2FC%2FSAU%2FCO%2F10-11&Lang=en (accessed on 18 August 2025), paras. 25 and 35 ss.

⁹¹ *Ibid.*, para. 26.

⁹² MENA Rights Group, *Ibrahim al-Huwaiti, member of Saudi tribe displaced by NEOM, sentenced to death*, 5 April 2023, available at: <https://menarights.org/en/case/ibrahim-salih-ahmad-abou-khalil-al-huwaiti> (accessed on 18 August 2025); UN Committee on the Elimination of Racial Discrimination, *Concluding observations on the combined tenth and eleventh periodic reports of Saudi Arabia**, 24 December 2024, UN Doc. CERD/C/SAU/CO/10-11, available at: https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=CERD%2FC%2FSAU%2FCO%2F10-11&Lang=en (accessed on 18 August 2025), paras. 37-38.

⁹³ ALQST for Human Rights, *The Dark Side of Neom: Expropriation, expulsion and prosecution of the region's inhabitants*, 16 February 2023, available at: <https://alqst.org/en/post/the-dark-side-of-neom-expropriation-expulsion-and-prosecution> (accessed on 18 August 2025).

5. Selective implementation of the SHRC's mandate

5.1 Legislative review and annual reporting

The mandate of the SHRC includes reviewing domestic legislation and regulations to ensure they align with human rights obligations and submitting proposals for draft laws.⁹⁴ The SHRC was notably established with the stated aim of protecting and promoting human rights in the Kingdom “in light of the provisions of Islamic law.” It is also granted the power to monitor the implementation of human rights obligations, advise authorities on compliance with treaties, and prepare annual reports.

The SHRC's most recent annual report, covering 2023 and published in 2024, focuses heavily on the institution's structure, staffing, workshops, and training initiatives.⁹⁵ It is mainly enumerating the number of “awareness campaigns” held and the staff employed across regions. The report fails to address systemic human rights violations, such as the sharp increase in executions, the ongoing imprisonment of women's rights defenders, or the persecution of minorities.

The report notably fails to address the problematic use of the Counter-Terrorism Law and the Anti-Cybercrime Law against human rights defenders and peaceful dissidents and

protesters, despite the fact that they were relied upon during the reporting period.

Despite its clearly problematic misuse, none of these laws were mentioned in the SHRC's Annual Report. There is no disaggregated data on complaints received or resolved, no acknowledgment of emblematic cases, and no independent analysis of the human rights situation in the Kingdom. Rather than engaging with violations, it paints a positive picture of progress, claiming alignment with international standards without substantiating such claims.

5.2 Individual complaints

One of the central functions of any NHRI is to provide an accessible and effective complaints mechanism for individuals whose rights have been violated. The SHRC offers the possibility for individuals, institutions, organisations and others to submit a complaint or report on human rights issues. These issues include equality and non-discrimination, opinion and expression, protection from violence and abuse and access to justice.⁹⁶

⁹⁴ SHRC, *Mandate and Functions*, available at: <https://www.hrc.gov.sa/website/about-us?lang=en> (accessed on 18 August 2025).

⁹⁵ SHRC, *Annual Report 2023*, available at: <https://www.hrc.gov.sa/annual-report-2023> (accessed on 18 August 2025), pp. 10-15.

⁹⁶ For a detailed analysis of the complaint procedure, see MENA Rights Group, ALQST for Human Rights, the European Saudi Organisation for Human Rights (ESOHR), *The Saudi Human Rights Commission : A whitewashing tool of the Kingdom*, November 2023, available at: <https://menarights.org/en/documents/saudi-human-rights-commission-whitewashing-tool-kingdom> (accessed on 18 August 2025), p. 25.



Picture of Foz al-Otaibi, sister of Manahel al-Otaibi. © Courtesy of ALQST for Human Rights.

In 2024, Foz al-Otaibi, sister of women's rights activist Manahel al-Otaibi, attempted to seek help from the SHRC regarding her sister's imprisonment. She contacted the SHRC by phone through the number available online. After multiple attempts, she was finally able to speak to a staff working for the SHRC for one minute. Instead of support, she reported that her number was blocked after she contacted the Commission.⁹⁷ This indicates not just ineffectiveness but active obstruction of victims' families seeking justice.

In another case, in May 2024, SHRC President Hala al-Tuwaijri told U.S. diplomats that then imprisoned prominent human rights defender Mohamed al-Qahtani⁹⁸ was in contact with his family and had spoken to them on the phone and denied that he was in a state of enforced disappearance. His



Picture of Mohammad al-Qahtani. © Courtesy of ALQST for Human Rights.

wife Maha al-Qahtani publicly refuted SHRC claims that her husband was in regular contact with his family.⁹⁹ In reality, he was subjected to enforced disappearance, with no communication allowed. She called on the SHRC and al-Tuwaijri to disclose al-Qahtani's fate and whereabouts, and to ensure he can communicate with his family and receive proper medical care and treatment.

The Commission's false assurances, relayed even to foreign embassies, serves to deflect scrutiny rather than protect victims. These examples reveal the SHRC's complaint mechanism to be a facade. Far from protecting individuals, it functions to contain grievances and protect state institutions from accountability.

⁹⁷ See tweets published by Foz al-Otaibi, available at : <https://twitter.com/ahxmousa/status/1787439465696260185>; <https://twitter.com/ahxmousa/status/1787443755600990675> (accessed on 18 August 2025).

⁹⁸ MENA Rights Group, *Mohammad Fahad al-Qahtani – freed after decade of arbitrary detention*, 13 June 2019, available at: <https://menarights.org/en/caseprofile/human-rights-defender-mohammad-al-qahtani-remains-detention-saudi-arabia-despite> (accessed on 22 August 2025).

⁹⁹ MENA Rights Group, ALQST for Human Rights, *Missing prisoner Mohammed al-Qahtani's family reject Saudi Human Rights Commission cover-up*, 8 May 2024, available at: <https://menarights.org/en/articles/missing-prisoner-mohammed-al-qahtanis-family-reject-saudi-human-rights-commission-cover> (accessed on 18 August 2025).

5.3 Visits and monitoring of places of detention

The SHRC is expressly empowered by its founding Statute to carry out unannounced monitoring of places of detention. Article 5(6) authorises the Commission to “visit prisons and detention centres at any time without permission from the competent authority and submit reports on them to the King,” and the Commission’s Follow-up and Investigation Department is tasked to “visit prisons and detention centers [...] without permission from the competent authority” when handling complaints.¹⁰⁰

Despite official assurances that Saudi Arabia has ended the death penalty for child defendants,¹⁰¹ several individuals convicted for protest-related conduct committed when they were under 18 have remained on death row through 2024-2025.¹⁰² Amongst them

are Abdullah al-Derazi and Jalal Labbad, who had death sentences upheld by the Supreme Court (placing them at imminent risk of execution), while Yusuf al-Manasif and Ali al-Mubaiouq had their cases pending before the Supreme Court for “protest-related crimes allegedly committed as children.”¹⁰³ UN Special Procedures mandate holders likewise expressed concern about the continuing prosecution and sentencing of child offenders in Saudi Arabia and urged their release.¹⁰⁴ Amnesty International reported on 22 August 2025 that Saudi authorities executed Jalal Labbad for alleged offenses committed when he was a child and warned for the safety of Abdullah al-Derazi and others.¹⁰⁵

In a correspondence with UN Special Procedures, the SHRC stated that it “followed” the cases, verified that “all laws and regulations related to human rights were applied,” “observed no instances of human rights violations,” and “continues to follow their cases.”¹⁰⁶ This official position contrasts with the persistent concerns raised by the UN WGAD about coerced confessions, due-

¹⁰⁰ Kingdom of Saudi Arabia, *Statute of the Human Rights Commission*, Royal Decree No. A/30 of 12 September 2005 (as amended), available at: <https://laws.boe.gov.sa/Files/Download/?attId=86943751-8f65-4a01-afee-adbb0103b5b7> (accessed on 27 August 2025), Article 5(6), p. 3: “Visit prisons and detention centers at any time without permission from the competent authority and submit reports on them to the King.”; Art. 11(d), p. 5: “It [the Follow-up and Investigation Department] shall [...] visit prisons and detention centers [...] without permission from the competent authority [...]”.

¹⁰¹ Amnesty International, *Young men face imminent execution despite assurances on re-sentencing juveniles to prison terms*, 10 October 2022, available at: https://www.amnesty.org/en/latest/news/2022/10/saudi-arabia-young-men-face-imminent-execution-despite-assurances-on-re-sentencing-juveniles-to-prison-terms/?utm_source=chatgpt.com (accessed on 27 August 2025); see also, statement published by the SHRC on X, available at: https://x.com/HRCSaudi_EN/status/1318935445284278273?s=19 (accessed on 27 August 2025).

¹⁰² MENA Rights Group, *Saudi Arabia continues to threaten the lives of minors, disregarding the UN WGAD’s recent Opinion*, 4 February 2025, available at: <https://menarights.org/en/articles/saudi-arabia-continues-threaten-lives-minors-disregarding-un-working-group-arbitrary> (accessed on 28 August 2025).

¹⁰³ Human Rights Watch, *Saudi Arabia: Halt Executions of Child Offenders* (news release), 29 April 2024, available at: <https://www.hrw.org/news/2024/04/29/saudi-arabia-halt-executions-child-offenders> (accessed on 27 August 2025).

¹⁰⁴ OHCHR, *Saudi Arabia: UN experts call for immediate release of child offenders* (press release), 30 April 2025, available at: <https://www.ohchr.org/en/press-releases/2025/04/saudi-arabia-un-experts-call-immediate-release-child-offenders> (accessed on 27 August 2025).

¹⁰⁵ Amnesty International, *Saudi Arabia: Deplorable execution exposes broken promise to halt death penalty for juveniles*, 22 August 2025, available at: <https://www.amnesty.org/en/latest/news/2025/08/saudi-arabia-deplorable-execution-exposes-broken-promise-to-halt-death-penalty-for-juveniles/> (accessed on 27 August 2025).

¹⁰⁶ Permanent Mission of Saudi Arabia to the United Nations Office at Geneva, *Reply to Special Procedures communication – HRC/NONE/2023/SP/43* (31 August 2023) (English translation, GE.23-19062), available at: <https://spcommreports.ohchr.org/TMResultsBase/DownloadFile?gId=37687> (accessed on 27 August 2025), p.6.

process violations, and the imposition or confirmation of death sentences for acts committed as minors,¹⁰⁷ and the recent execution of Jalal Labbad.

Taken together, these records indicate a gap between the SHRC's statutory mandate to monitor detention and the reality faced by child defendants sentenced to death: international actors have repeatedly raised specific juvenile cases; yet, beyond the government's assertion that the SHRC "observed no instances of human rights violations," there is no public indication of independent investigations or remedial action by the Commission.

¹⁰⁷ UN WGAD, *Opinion No. 71/2024 concerning Abdullah al-Derazi, Jalal al-Labbad, Yusuf Muhammad Mahdi al-Manasif, Jawad Abdullah Qureiris and Hassan Zaki al-Faraj (Saudi Arabia)*, 15 November 2024, UN Doc. A/HRC/WGAD/2024/71, available at: <https://www.ohchr.org/sites/default/files/documents/issues/detention-wg/opinions/session101/a-hrc-wgad-2024-71-saudi-arabia-advance-edited.pdf> (accessed on 15 August 2025).

6. Regional and international engagement legitimising the SHRC as a credible actor

6.1 United Nations, European Union and UN Member States

In December 2024, the fourth EU-Saudi Arabia Human Rights Dialogue was held in Riyadh, with the SHRC leading the Saudi delegation.¹⁰⁸ The official readouts highlighted

discussions on women's rights, rule of law, and fair trials. Yet the dialogue concluded without any measurable commitments or acknowledgment of ongoing abuses.

For the SHRC, the dialogue served as a powerful legitimising tool. By presenting itself as the interlocutor of the European Union, the Commission projects the image of an independent NHRI, despite its lack of compliance with the Paris Principles. European engagement, in turn, risks providing cover for Saudi Arabia's deteriorating human rights record.

¹⁰⁸ EEAS, *Saudi Arabia: 4th EU-KSA Human Rights Dialogue held in Riyadh*, 20 December 2024, available at: https://www.eeas.europa.eu/eeas/saudi-arabia-4th-eu-ksa-human-rights-dialogue-held-riyadh_en (accessed on 18 August 2025). See also, tweets published by the SHRC: https://x.com/HRCSaudi_EN/status/1869121902591230240 (accessed on 18 August 2025).

Colourful painted big national flag European union and flag of Saudi Arabia on a massive old brick wall background. Concept. © Esfera, licensed under Shutterstock.



In April 2025, the United Nations Independent Expert on the enjoyment of all human rights by older persons visited Saudi Arabia, where she was reportedly received by the SHRC.¹⁰⁹ While the expert praised some domestic initiatives, she also emphasised that rights protections must extend to non-citizens, who make up a significant portion of Saudi Arabia's older population.¹¹⁰ Importantly, she announced that her request to meet with two detained older clerics and human rights defenders was denied, further stating that "this refusal to allow access goes against the Terms of Reference for country visits by Special Procedures and raises concerns about the wellbeing of detainees."¹¹¹

6.2 Training programs and technical cooperation

Beyond the EU, the SHRC has invested heavily in showcasing its partnerships with international organisations. In December 2024, the SHRC launched the "Expert in Human Rights Program," jointly organized with United Nations Institute for Training and Research

(UNITAR) to train Saudi professionals and officials in international human rights standards.¹¹² The program was widely promoted by Saudi media and official channels, with the SHRC framing it as a milestone in national capacity building.¹¹³ There is no transparency about the program's curriculum or its intended outcomes which cannot be found through open-source research. If UNITAR and the SHRC were genuinely training participants on international standards, one would expect sessions on the prohibition of torture, the importance of judicial independence, or the rights of detainees.

In May 2025, the SHRC signed a memorandum of understanding (MoU) with the United Nations High Commissioner for Refugees (UNHCR), focusing on the protection of refugees and asylum seekers.¹¹⁴ Saudi Arabia is not a party to the 1951 Refugee Convention, nor does it have a domestic asylum system. Migrants and asylum seekers are often detained in inhumane conditions, subjected to deportation without due process, and denied basic rights. Against this backdrop, the SHRC's MoU with UNHCR functions as a public relations exercise, allowing the government to claim international cooperation without making binding commitments. The SHRC has seemingly not reported on any cases of

¹⁰⁹ UN Human Rights Council, *Report of the Independent Expert on the enjoyment of all human rights by older persons*, A/HRC/60/24, 17 July 2025, available at: <https://docs.un.org/en/A/HRC/60/24> (accessed on 22 August 2025), noting the Independent Expert's visit to Saudi Arabia from 20 to 30 April 2025, para. 2; OHCHR, *UN expert on human rights of older persons to visit Saudi Arabia*, 17 April 2025, available at: <https://www.ohchr.org/en/press-releases/2025/04/un-expert-human-rights-older-persons-visit-saudi-arabia> (accessed on 22 August 2025).

¹¹⁰ OHCHR, *Saudi Arabia must extend its achievements in the human rights of older persons, including healthcare, to everyone, including non-citizens*, 30 April 2025, available at: <https://www.ohchr.org/en/press-releases/2025/04/saudi-arabia-must-extend-achievements-all-older-persons-including-non> (accessed on 22 August 2025).

¹¹¹ OHCHR, *Saudi Arabia must extend achievements to all older persons, including non-citizens, says expert*, 30 April 2025, available at: <https://www.ohchr.org/en/press-releases/2025/04/saudi-arabia-must-extend-achievements-all-older-persons-including-non> (accessed on 18 August 2025).

¹¹² UNITAR, *Expert in Human Rights Programme" Special Launch Event*, 17 December 2024, available at: <https://unitar.org/about/news-stories/news/expert-human-rights-programme-special-launch-event> (accessed on 18 August 2025).

¹¹³ UNITAR, *The Expert in Human Rights Programme in the Kingdom of Saudi Arabia Celebrates the end of its Training Lessons*, 2 June 2025, available at: <https://unitar.org/about/news-stories/news/expert-human-rights-programme-kingdom-saudi-arabia-celebrates-end-its-training-lessons> (accessed on 18 August 2025).

¹¹⁴ KSA News, *Human Rights Commission and UNHCR Ink Cooperation Agreement*, 12 May 2025, available at: <https://ksa.com/human-rights-commission-and-unhcr-ink-cooperation-agreement/> (accessed on 22 August 2025).



Geneva, Switzerland – April 23, 2015: Palais Wilson building. The headquarters of Office of the United Nations High Commissioner for Human Rights (OHCHR). Geneva, Switzerland. © Mike Gorsky, licensed under Shutterstock.

arbitrary detention or abuse of migrants, nor has it intervened to protect the rights of the 26 Egyptians at risk of execution in 2025. Instead, the MoU allows Saudi Arabia to present itself as aligned with UNHCR’s mandate while avoiding structural reforms.

The Office of the United Nations High Commissioner for Human Rights (OHCHR) has maintained a long-standing technical cooperation programme with the Saudi Human Rights Commission (SHRC), initiated through a Memorandum of Understanding signed in June 2012.¹¹⁵ Under this agreement, OHCHR delivers training programmes, awareness-raising workshops, and capacity building for prison staff and other officials, ostensibly aimed at aligning national practices with international human rights

norms.¹¹⁶ While such capacity-building efforts are not inherently problematic, in the context of the SHRC they risk being instrumentalized to confer a veneer of legitimacy without accompanying oversight or investigative capacity. The SHRC has not been endowed with a genuine monitoring mandate; instead, training appears detached from accountability – after more than a decade of cooperation, human rights conditions have notably deteriorated in the Kingdom, casting doubt on the utility of these programmes.¹¹⁷

¹¹⁵ Human Rights Commission (Saudi Arabia), *Cooperation with OHCHR* (website), 8 January 2023, available at: <https://www.hrc.gov.sa/website/cooperations?lang=en> (accessed on 22 August 2025), noting that “a Memorandum of Understanding (MoU) for technical cooperation was signed between HRC and OHCHR on 27/6/2012” for human rights promotion through training and programs.

¹¹⁶ OHCHR, *Human Rights and Prisons: Training of Trainers Workshop* (UN website), 23 February 2022, available at: <https://saudiarabia.un.org/en/173081-human-rights-and-prisons-training-trainers-workshop-prisons%E2%80%99staff> (accessed on 22 August 2025), describing a two-phase “Training of Trainers Workshop” designed under the Technical Cooperation Programme to empower prison staff with knowledge of the Nelson Mandela Rules and other international standards.

¹¹⁷ MENA Rights Group, ALQST for Human Rights, the European Saudi Organisation for Human Rights (ESOHR), *The Saudi Human Rights Commission: a Whitewashing Tool of the Kingdom*, 27 November 2023, available at: <https://menarights.org/en/documents/saudi-human-rights-commission-whitewashing-tool-kingdom> (accessed on 22 August 2025), p. 7.

7. Conclusion and recommendations

The SHRC, 20 years after its creation, has failed to operate as an independent and effective NHRI. Rather than functioning in accordance with the Paris Principles, the SHRC has consistently acted as an extension of the executive authority. Its leadership is appointed by royal decree, its mandate selectively implemented, and its international engagement primarily aimed at legitimising government policies. Instead of documenting abuses or providing remedies to victims, the SHRC promotes a narrative of progress and reform while remaining silent on systemic violations such as arbitrary detention, torture, executions, and reprisals against human rights defenders.

Through its participation in United Nations mechanisms, the SHRC frequently presents a positive image of Saudi Arabia's human rights record, downplaying or denying credible allegations of abuse. The SHRC fails to investigate violations, blocks access to remedies, and aligns its messaging with official rhetoric. Its international cooperation, through memoranda of understanding with UN agencies, training partnerships, and dialogues with foreign governments, has not translated into structural reforms or improved accountability. On the contrary, these initiatives risk consolidating the SHRC's role as a vehicle of whitewashing, reinforcing government narratives instead of addressing violations.

In light of these findings, the following recommendations are made:

7.1 General recommendations to the government of Saudi Arabia

1. Establish a genuine NHRI in line with the Paris Principles, with a transparent appointment process, secure tenure for members, and adequate financial and administrative autonomy.
2. Ensure the SHRC, or any future institution, seeks accreditation with the GANHRI to guarantee compliance with international standards.
3. Amend the SHRC's statute to grant it the authority and independence to investigate human rights violations, publish findings, and provide remedies to victims without interference.
4. Guarantee the SHRC's ability to monitor all detention facilities and meet with detainees confidentially and without prior approval from security services.
5. End the practice of using the SHRC as part of official state delegations to UN human rights mechanisms, and ensure its role is limited to that of an independent NHRI.
6. Implement recommendations issued by UN Treaty Bodies and the Universal Periodic Review, particularly those related to abolition of the death penalty, prohibition of torture, and protection of human rights defenders.

7. Engage in genuine cooperation with domestic civil society organisations, ensuring victims and their families can safely raise concerns.

7.2 To international stakeholders, including UN agencies and foreign governments

1. Condition cooperation with the SHRC on demonstrable progress toward independence and effectiveness in line with the Paris Principles.
2. Avoid legitimising the SHRC as an independent NHRI until structural reforms are undertaken, and instead engage directly with civil society organisations and victims.
3. Increase monitoring of Saudi Arabia's compliance with international human rights obligations, including through the UN Human Rights Council, Treaty Bodies, and Special Procedures.

7.3 Implementation of recommendations made by international review mechanisms

With reference to the Universal Periodic Review

1. Implement UPR recommendations related to the abolition of the death penalty, protection of freedom of expression, and prohibition of torture, and empower the SHRC to independently monitor compliance.
2. End the practice of having the SHRC head the state delegation to the UPR to whitewash violations; instead, the SHRC should provide an independent, parallel assessment of Saudi Arabia's record.
3. Ensure that follow-up to UPR recommendations is transparent and inclusive, with the SHRC publishing independent progress reports rather than replicating government positions.

With reference to the review of Saudi Arabia by the Committee on the Elimination of Discrimination Against Women

1. Guarantee the SHRC's independence so it can effectively contribute to monitoring the implementation of women's rights obligations.
2. Ensure that the SHRC has the capacity and authority to address violations of women's rights, including discrimination in family law, male guardianship rules, and restrictions on participation in public life.
3. Establish safe and accessible channels for women human rights defenders to engage with the SHRC and raise concerns without fear of reprisals.

With reference to the review of Saudi Arabia by the Committee on the Elimination of Racial Discrimination

1. Support the adoption of comprehensive anti-discrimination legislation that defines racial discrimination broadly and addresses structural, direct, indirect, and intersecting forms of inequality, in line with the CERD's recommendations.
2. Ensure that the SHRC monitors and reports on discrimination faced by Shi'a communities, non-citizens, and migrant workers, and that victims have access to complaints and remedies.
3. Refrain from dismissing reports of discrimination as "unfounded" and instead engage with CERD's findings to address long-standing inequalities.



ALQST for Human Rights is an independent NGO established in 2014 by Saudi Arabian human rights defender Yahya Assiri for the purpose of defending and promoting human rights in Saudi Arabia. 'Al-qist' means 'justice' in Arabic, and a passion for justice lies at the heart of all our work. We take a consistent human rights-based approach based on international human rights law and international standards, and defend fundamental rights for all without any distinction of race, colour, sex, language, religion or national or social origin. We conduct on-the-ground research, engage in international legal and public advocacy, and campaign on behalf of victims of human rights abuses.

The **European Saudi Organisation for Human Rights** is a non-profit organisation, created by a group of activists aiming to promote commitment to human rights principles in the Kingdom of Saudi Arabia.

MENA Rights Group is a Geneva-based legal advocacy NGO defending and promoting fundamental rights and freedoms in the Middle East and North Africa (MENA) region. Adopting a holistic approach, we work at both the individual and structural level. We represent victims of human rights violations before international law mechanisms. In order to ensure the non-repetition of these violations, we identify patterns and root causes of violations on the ground and bring key issues to the attention of relevant stakeholders to call for legal and policy reform.