



SUPPORTING  
AN ENABLING ENVIRONMENT  
FOR CIVIL SOCIETY

# Enabling Environment Snapshot

**Sudan**

**May 2026**

## Context

Reporting period: October 2025-May 2026

Since the [outbreak of armed conflict in Sudan in April 2023](#) between the Sudanese Armed Forces (SAF) and the Rapid Support Forces (RSF), the enabling environment for civil society has continued to deteriorate. Between October 2025 and May 2026, violence and violations against civilians escalated alongside increasing restrictions targeting civil society organisations, humanitarian actors, journalists, and human rights defenders and this has intensified, particularly in Khartoum, Darfur, Blue Nile, and South Kordofan. By the end of 2025, civic space in Sudan was downgraded from being rated as “repressed” to [closed](#) in the CIVICUS Monitor. Emergency [Response Rooms \(ERRs\)](#), which [emerged](#) as community-based initiatives providing humanitarian assistance since the outbreak of war, have faced growing pressure, including funding suspensions, surveillance, security interrogations, and arrests of volunteers and humanitarian workers.

The reporting period also witnessed the closure or suspension of several civil society organisations, including humanitarian and development organisations in Darfur, due to administrative and security restrictions. Cases of arbitrary arrest targeting women activists and journalists were documented, alongside criminal proceedings against lawyers and human rights defenders in connection with public statements and civic activities.

In some conflict-affected areas controlled by armed actors, restrictions on freedom of movement and discriminatory practices based on ethnic identity were reported, in addition to increasing threats against humanitarian workers. Armed attacks and insecurity have also directly affected the ability of local organisations and community initiatives to provide essential services to civilians.

Overall, the situation reflects a severe shrinking of civic space in Sudan amid ongoing armed conflict, growing security interference, and the absence of adequate protection for fundamental freedoms, including freedom of expression, association, and peaceful assembly.

## 1. Respect and protection of fundamental freedoms

The state of civic space in Sudan deteriorated from a “repressed” to a “closed” rating in the [CIVICUS Monitor](#) during the reporting period, with continued violations targeting freedoms of expression, association, and peaceful assembly amid the ongoing armed conflict. Civil society actors, journalists, humanitarian workers, women activists, and community-based initiatives [faced increasing intimidation](#), arbitrary arrests, administrative restrictions, and security harassment by both state and non-state actors.

Freedom of expression, which is enshrined in Article 56 of the [Transitional Constitution of the Republic of Sudan \(2019\)](#), was significantly undermined in practice through the arrest and intimidation of journalists and activists. In March 2026, journalist [Mayah Al-Nil Mubarak was arrested and interrogated](#) by members of the General Intelligence Service in Jabal Awliya while covering school examinations. On 5 March 2026, female journalist Manal Mustafa and several women activists in Nyala, South Darfur, were also [arrested by RSF-affiliated forces](#) following activities related to women’s rights and journalism training. Human rights defenders and lawyers, including members of the Emergency Lawyers group, also faced criminal proceedings linked to public statements and advocacy activities.

Freedom of assembly and association is constitutionally protected under Article 57 of the Sudanese Constitutional Charter (2019 transitional Constitution), which guarantees the right to peaceful assembly, protest and association. However, this right is constrained in practice through security legislation, emergency regulations, and administrative measures regulating civil society organisations, which have been used to restrict activities and deter public gatherings. In some cases, emergency laws and administrative orders issued by the de facto authorities in Port Sudan are also applied, along with the powers granted to security and intelligence agencies. This creates a broad scope for interpretation and application in cases related to civic activism and humanitarian work. Sudanese NGOs working together to respond to the humanitarian crisis in Sudan were also pressured to share sensitive operational and financial information regarding ERR activities, contributing to the suspension of funding and weakening cooperation between community initiatives and humanitarian actors.

Between October 2025 and May 2026, civil society actors faced increasing restrictions, including surveillance, arrests, and suspension of humanitarian and civic initiatives. Emergency Response Rooms (ERRs) also faced funding suspensions, surveillance, and arrests of volunteers. On 31 March 2026, volunteer doctor Hamid Al-Naeem, a member of the East Nile Emergency Response Room in Al-Jereif East, [was arrested](#) by security forces and taken to a facility locally known as the “security cell.” This entity was recently established following the outbreak of war and includes members from various formal and informal security actors, including the National Intelligence Service, the Sudanese Armed Forces, and allied non-state forces.

The legal framework used in areas under the control of the Sudanese Armed Forces is primarily based on the [Sudanese Criminal Act of 1991](#) as the main reference for criminal prosecutions and legal proceedings. This includes provisions that are frequently used in cases of a security or political nature, such as Article (50) on undermining the constitutional order and Article (51) on waging war against the state, in addition to other provisions such as Article (66) on spreading false information and Article (69) on disturbing public order.

In South Kordofan, the [arbitrary arrest of humanitarian activist Najwa](#) Musa Kunda on 2 April 2026 by intelligence elements affiliated with SPLA-North reflected broader patterns of ethnic-based targeting against members of the Otoro community. The incident formed part of a wider context in which civic engagement and humanitarian presence were increasingly interpreted through ethnic and security lenses, reinforcing divisive narratives around identity and belonging.

In certain instances, court rulings in absentia were issued against lawyers and human rights defenders outside Sudan, as part of legal actions widely perceived by civil society as tools of pressure and deterrence. On 19 April 2026, Sudanese state security prosecution authorities initiated criminal proceedings against lawyer and human rights defender [Rehab Mubarak Sayed Ahmed](#), a member of the Emergency Lawyers group, along with at least 22 other lawyers and activists. The cases were filed under Articles 50 and 51 of the 1991 Sudanese Criminal Act. The charges stem from media statements addressing a procurement process involving large quantities of chlorine gas for the Khartoum State Water Authority. This has contributed to an environment of legal intimidation that restricts the ability of actors to document violations or freely express their views.

## 2. Supportive legal and regulatory framework

The current legal and regulatory framework in Sudan continues to significantly hinder the work of civil society actors rather than support it. The operating environment for CSOs thus remains highly restrictive in practice, with reported incidents between October 2025 and May 2026 including funding suspensions, increased surveillance, arrests of volunteers, and operational constraints on humanitarian initiatives such as Emergency Response Rooms (ERRs), further reflecting the shrinking civic space.

Although laws and administrative structures regulating civil society organisations formally exist, primarily under the [Voluntary and Humanitarian Work \(VHO\) Act 2006](#) and related administrative regulations issued by the Humanitarian Aid Commission (HAC), in practice these [frameworks require mandatory registration for CSOs](#) to operate and are increasingly used to impose restrictions, surveillance, and administrative control over humanitarian and civic activities, particularly in conflict-affected areas. Section 6 of the VHO Act narrowly frames humanitarian work around emergency relief, disaster management, and reconstruction, and although it includes a parenthetical reference to services such as human rights and environmental protection, it still implicitly sidelines the broader roles of civil society organisations in governance and accountability.

The legal framework grants broad discretionary powers to state authorities to approve, suspend, or revoke registration, regulate funding, and impose reporting requirements, which can undermine the independence and operational autonomy of organisations. Legal and administrative frameworks have also increasingly been used in ways that lack neutrality, serving the interests of parties to the conflict and enabling greater control over humanitarian and civic work. In February 2025, authorities [cancelled](#) the registration of four Sudanese NGOs, while the Sudan Social Development Organisation (SUDO) was [forced to suspend operations](#) in several Darfur states after authorities [refused to renew its registration](#). On 15 April 2026, RSF authorities in Nyala [issued a decree](#) titled “Governance and Regulation of the Work of Foreign and National Organisations,” requiring organisations operating in areas under their control to re-register before 30 April and submit detailed project information, budgets, and monitoring and evaluation plans. The decision came following reports documenting conflict-related sexual violence in RSF-controlled areas and raised concerns regarding surveillance and restrictions on humanitarian and civic work. The [decision raised serious](#) concerns regarding interference, monitoring, and restrictions on the independence of humanitarian and civil society work, particularly within the context of ongoing conflict and documented violations in areas under RSF control.

Overall, the legal and administrative environment in Sudan does not provide adequate protection for civil society actors and has contributed to further shrinking civic space and restricting independent humanitarian and human rights work.

### 3. Accessible and sustainable resources

Access to funding and sustainable resources for civil society actors in Sudan remained extremely limited during the reporting period, particularly for grassroots initiatives and organisations operating in conflict-affected areas. Ongoing armed conflict, banking restrictions, insecurity, and increasing administrative interference have significantly disrupted humanitarian and civic funding channels.

Administrative restrictions also affected humanitarian organisations operating in Darfur. The [refusal to renew the registration](#) of the Sudan Social Development Organisation (SUDO), as well as additional registration requirements imposed by RSF authorities in Nyala, created

further obstacles for organisations seeking to maintain operations and access funding. These measures increased fears of surveillance, interference, and potential reprisals against organisations and volunteers.

In addition, insecurity, arbitrary arrests of volunteers and humanitarian workers, and restrictions on banking and financial transfers have made it increasingly difficult for local organisations to sustain operations safely and independently. Some organisations that have [experienced](#) similar challenges include Darfur Victims Support Organisation, Kayan Organisation for Women's Empowerment and Peace Building, Enjaz Organisation for Gender, Humanitarian Aid and Development, and the Union of Darfuri Scholars and Experts Organisation. While community-based initiatives continue to play a vital role in humanitarian response, the overall environment remains highly restrictive and unsupportive of sustainable civil society funding and resource mobilisation in Sudan.

These challenges do not affect all civil society organisations equally, but instead have a more severe and specific impact on structurally weaker groups within the sector. Small organisations are often directly affected by mandatory registration procedures, lengthy administrative approvals, and suspension of activities or funding, as they lack financial reserves or alternative funding sources to sustain operations when support is interrupted. Women-led organisations face greater constraints related to access to funding and formal networks, in addition to social and security pressures that limit their mobility and their ability to engage with donors or authorities. Youth-led organisations often face limitations in institutional experience and formal recognition, which can make registration or accreditation more difficult and reduce their ability to operate independently. Rural organisations face compounded challenges linked to geographic distance from decision-making centres, weak infrastructure, and difficulties in accessing registration, monitoring, and compliance processes, as well as greater exposure to security restrictions in conflict-affected areas, making their operational continuity more fragile compared to urban or larger organisations.

## 4. Open and responsive state

The relationship between civil society and state authorities in Sudan remained highly restricted during the reporting period and was characterised by limited trust, increasing interference, and the absence of effective consultation mechanisms. Ongoing armed conflict and political fragmentation further reduced opportunities for meaningful engagement between civil society actors and state institutions.

In Sudan, there is currently no specific and fully effective access to information law in force. Although the 2019 Constitutional Charter provides for this right within the Bill of Rights, particularly under Article 56 on freedom of expression and the right to receive and disseminate information, in practice this right remains limited due to the absence of a detailed legal framework that establishes clear and binding mechanisms for accessing government information, as well as the continued application of security laws and administrative regulations that restrict disclosure. Civil society organisations face significant challenges in accessing government-held information, including difficulties in obtaining official data, lack of transparency, and reliance on administrative decisions that are often unpublished or insufficiently explained, in addition to security and administrative restrictions on information sharing, particularly in conflict contexts.

The 2019 Constitutional Charter (Article 58) provides for the right to political participation in public affairs for 'every citizen', 'as regulated by law.' However, there is no unified legal

framework or formal institutional platform that ensures structured and binding participation of civil society organisations in decision-making processes. Participation is generally ad hoc and irregular, often occurring through selective consultations or invitations from government entities or international partners rather than through a permanent national mechanism. During the reporting period (October 2025 – May 2026), there is no evidence of a permanent official platform for government consultation with civil society, while the overall environment continued to be characterised by weak transparency and restricted information flows, limiting the ability of organisations to plan effectively and ensure accountability. Rather than supporting collaboration, authorities increasingly approached civil society organisations and grassroots initiatives through security and administrative measures. Civil society organisations were generally not meaningfully consulted in decision-making processes related to humanitarian response, civic space, or regulatory measures affecting their work. Women activists, journalists, and humanitarian workers also faced arrests, intimidation, and restrictions that limited their ability to participate safely in public and civic engagement.

In areas under the control of conflict parties, decision-making processes increasingly lacked transparency and inclusiveness. For example, the decree issued by RSF authorities in Nyala regarding the [“Governance and Regulation of the Work of Foreign and National Organizations”](#) was introduced without meaningful consultation with civil society organisations operating in the region, despite its direct impact on humanitarian and civic work. Areas under SAF control also witnessed the closure of five civil society organisations, reflecting growing restrictions on civic space by different parties to the conflict.

Although community initiatives and volunteers continued to fill critical humanitarian gaps, ERR volunteers faced arrests, interrogations, and criminal accusations related to threatening state security or receiving foreign funding simply for engaging in humanitarian work. Reports also documented cases of ill-treatment and torture of volunteers inside detention facilities, creating an environment of fear that further restricted the ability of grassroots initiatives and volunteers to operate safely and independently.

## 5. Supportive public culture and discourses on civil society

During the reporting period, a highly polarised post-15 April 2023 war context between the SAF and the RSF directly influenced how civil society organisations were perceived. Judgements about CSOs were no longer based solely on their activities, but increasingly on their perceived alignment within the broader political and military divide.

On the positive side, grassroots initiatives such as emergency response rooms and local volunteers continued to enjoy a degree of public acceptance, particularly in conflict-affected areas where basic services had collapsed. These initiatives were described by local communities and independent media as the “first civilian line of response” in delivering food, health services, and humanitarian assistance. This contributed to a relatively positive perception of community-based humanitarian CSOs, especially when their work was visible and directly responsive to urgent needs.

In contrast, clear patterns of negative labelling emerged from state and state-aligned narratives, as well as actors linked to both SAF and RSF, particularly targeting CSOs engaged in documentation, human rights work, or independent reporting of violations. In this context,

terms such as “agents,” “foreign agendas,” or “political bias” were used against certain civil society actors, undermining their legitimacy in public discourse. These narratives were not isolated incidents but were repeatedly reproduced in war-related media, social media platforms, and both formal and informal communications associated with the conflict parties.

The media played a central role in reproducing this polarisation. SAF-aligned media often focused on discrediting certain documentation networks and independent initiatives, while in RSF-controlled areas, similar narratives also emerged against initiatives perceived as misaligned with local authority narratives. In contrast, independent and fact-checking media platforms maintained a more positive framing of grassroots initiatives, although their reach remained limited compared to conflict-driven media outlets.

At the level of government/authority perception, there is no unified recognition of CSO legitimacy. Each party to the conflict applies a selective approach: humanitarian service delivery actors are often tolerated or partially supported, while accountability and human rights-focused organisations face suspicion or hostility. This has resulted in a situation where CSO legitimacy is conditional, politically influenced, and not institutionally guaranteed.

Regarding inclusion, the 2019 Constitutional Charter (Article 47) provides equality before the law and prohibits exclusion and segregation based on “ethnicity, colour, gender, language, religious faith, political opinion, racial or ethnic origin, or any other reason.” Marginalised groups continued to participate in public affairs, primarily through grassroots initiatives, particularly women, displaced populations, and communities in conflict zones. However, the war significantly weakened their ability to organise and be represented, with CSOs representing these groups affected by displacement, funding disruptions, and security risks, leading to fragmented and localised civic engagement.

Finally, there is no clear evidence of a structured civic education curriculum being effectively implemented during the post-war period. This gap has contributed to a situation where public understanding of CSOs is largely shaped by war-related media and social media narratives rather than formal civic education, increasing susceptibility to politically driven framings of civil society roles.

## 6. Access to a secure digital environment

Article 56(2) of the 2019 Constitutional Charter enables CSOs to conduct online work by recognising a right to internet access, but this freedom is significantly qualified and potentially constrained by broad legal limitations tied to public order, safety, and morals, which can be subjectively interpreted and restrict full digital operational autonomy. Internet access in Sudan continued to be severely affected by the ongoing armed conflict. Multiple disruptions and shutdowns of telecommunications and internet services were reported in different parts of the country, resulting from damage to infrastructure, power outages, and conflict-related restrictions. These disruptions significantly affected the ability of civil society organisations, humanitarian actors, journalists, and human rights defenders to communicate, document violations, and deliver services. Reports of recurring internet outages throughout 2025 further contributed to Sudan’s status as one of the most digitally disrupted environments in the region.

Sudan has existing legislation related to cybercrime, most notably the [Cybercrime Act](#), which has been amended on several occasions. However, Sudan does not currently have a comprehensive data protection framework that effectively safeguards personal data in line with international standards. Civil society actors have expressed concerns that cybercrime

provisions may be used in broad or vague ways that could restrict freedom of expression online and increase risks for individuals engaging in digital activism.

During the reporting period, there were no publicly documented large-scale cybersecurity breaches specifically targeting CSOs. Nevertheless, civil society organisations, journalists, and activists continued to face digital security risks, including surveillance concerns, account hacking attempts, and threats linked to their online activities. The broader conflict environment and communications disruptions further increased digital vulnerability for civic actors.

Internet accessibility remained limited. According to [DataReportal](#), Sudan had approximately 14.9 million internet users at the end of 2025, representing an internet penetration rate of 28.7 percent of the population, while more than 70 percent of the population remained offline. Connectivity challenges were particularly acute in rural and conflict-affected areas, where telecommunications infrastructure has been damaged or rendered inoperable.

The affordability of internet access also remained a significant challenge. Ongoing economic deterioration, inflation, displacement, and frequent disruptions to electricity and telecommunications services increased the effective cost of connectivity for users. As a result, reliable internet access remained inaccessible for many Sudanese citizens, limiting opportunities for civic participation, access to information, and engagement with civil society initiatives.

In many areas, civil society actors were forced to rely on alternative connectivity solutions, including the use of “Starlink” in several areas under the control of the RSF. However, online activity in these areas is subject to high levels of monitoring and requires extreme caution when sharing information due to surveillance risks.

In areas under the control of the SAF, the use of [Starlink devices has been prohibited](#), and internet services have only been partially and gradually restored in an unstable manner. Although connectivity has returned in some locations, it remains weak and insufficient to support sustained civic engagement. These areas are also characterised by strict surveillance of digital activity, contributing to a highly controlled digital environment.

Overall, the digital environment in Sudan remains highly insecure and heavily restricted, mainly by the war situation. Civil society actors face significant risks when accessing or sharing information online, including monitoring and self-censorship due to security concerns. [Cases of cyber harassment](#), online intimidation, and disinformation campaigns targeting human rights defenders, journalists, and humanitarian workers have been reported by both state and non-state actors, including the RSF. These cases have not been systematically documented within the civil society early warning system, although they have been repeatedly reported in field contexts. As a result, the digital space continues to pose serious risks to privacy, freedom of expression, and the safety of civil society operations in Sudan.

## Challenges and Opportunities

Over the next four months, civil society actors in Sudan are expected to face increasing challenges related to insecurity, restrictions on civic space, and growing interference by conflict parties. Humanitarian organisations, grassroots initiatives, journalists, human rights defenders, and volunteers are likely to face additional security restrictions that limit their ability to operate freely and independently. There is also a high risk of further arbitrary arrests, detentions, and legally questionable prosecutions targeting human rights defenders, lawyers,

journalists, and Emergency Response Room volunteers, particularly amid increasing securitisation and militarisation of civic spaces.

Administrative restrictions, surveillance, funding obstacles, and pressure on independent organisations are also expected to continue, further limiting the ability of civil society actors to provide humanitarian assistance and document violations. The shrinking civic space may discourage participation, increase self-censorship, and expose activists to greater risks.

Despite these challenges, opportunities remain to strengthen the enabling environment through increased international attention, protection mechanisms for civil society actors, and support for community-led humanitarian initiatives. Strengthening digital security, legal protection, and sustainable funding mechanisms for local organisations will also be critical.

To address these challenges, greater pressure is needed on all parties to the conflict to respect fundamental freedoms, protect humanitarian workers and human rights defenders, and end arbitrary arrests and restrictions on civic action. Stronger international advocacy, accountability measures, and sustained support for independent civil society organisations are essential to ensure that civic actors can continue their work safely and effectively.

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