

GENEVA HUMAN RIGHTS HUB



**The Human Rights Council's
Interpretative and Guidance Role in
the Digital Age:**
Lessons from Two Decades and Priorities
for its Human Rights Ecosystem

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INTRODUCTION

Background and context: digital transformation as a human rights issue and an institutional reality

In the twenty years since the Human Rights Council (HRC) was established, digital technologies have moved from the margins of human rights debate to the infrastructure people use to work, learn, communicate, access public services, and exercise political agency. Data-intensive systems and artificial intelligence (AI) increasingly influence decisions ranging from welfare, employment, and health to migration, policing, and housing. The same technologies that can widen access and make institutions more effective can also amplify discrimination and inequality, enable surveillance and violence, and concentrate private power.

The Council's response has evolved accordingly. Its landmark 2012 affirmation that people's offline rights must also be protected online established the basic premise.¹ Subsequent resolutions have addressed privacy, freedom of expression, Internet access and shutdowns, digital divides, disinformation, civil society space, and business responsibilities. The more recent sequence on digital technologies and human rights, such as resolutions [41/11](#), [47/23](#), [53/29](#) and [59/11](#), has progressively shifted the Council from identifying risks to asking how international human rights law should guide the full technology life cycle.²

Digital transformation is also changing the human rights system itself. OHCHR, States, NHRIs, civil society organisations, and researchers are experimenting with platforms that organise recommendations, connect mandates and resolutions, support national follow-up, preserve institutional memory, and make large collections of human rights information searchable.³ The central question is therefore twofold: how should human rights be interpreted and applied in a technologically transformed world, and how can digital tools strengthen the Council's own ability to provide coherent, usable guidance?

Why interpretation and guidance matter now

International human rights law was deliberately framed in general terms that can apply as societies and technologies change. The roundtable's clearest point was that technological novelty does not create a legal vacuum. Among others, rights to equality, privacy, expression, peaceful assembly, work, health, education, culture and an effective remedy continue to bind States. The State duty to protect against abuses by business

¹ Human Rights Council, [resolution 20/8, *The promotion, protection and enjoyment of human rights on the Internet*](#), 5 July 2012. The principle has been reaffirmed in later relevant resolutions, including [26/13](#), [32/13](#), [38/7](#), [47/16](#) and [50/15](#).

² Human Rights Council resolutions [41/11](#) (2019), [47/23](#) (2021), [53/29](#) (2023) and [59/11](#) (2025), all entitled *New and emerging digital technologies and human rights*.

³ See, for example, L. Szoszkiewicz, *UN Human Rights Analytics*, a searchable platform organising more than 267,000 recommendations from UN human rights mechanisms across 198 countries, available at https://lszoszk.github.io/UnitedNations_recommendations/ (accessed 16 September 2026).

enterprises and the corporate responsibility to respect human rights also remain applicable.

The challenge lies mainly in interpretation, implementation, and accountability. Automated systems can operate at a speed, scale and opacity that make familiar harms cumulative or systemic. As their effects can be distributed across developers, data brokers, cloud and infrastructure providers, public authorities, and deployers, general legal obligations must be translated into practical requirements for system design, procurement, deployment, monitoring, human review, and remedy. While avoiding duplication of technical, security or sectoral governance processes is essential, the Council remains uniquely placed to provide the human rights anchor for that translation.

This claim is not only theoretical. Output from the UN's human rights system, whether via resolutions or further elaborative work, such as the UN Guiding Principles on Business and Human Rights⁴ have largely informed governance frameworks, such as the EU's Digital Services Act, or national legislative projects, e.g. in Brazil or the Swiss LPCom proposal.

The Council's twentieth anniversary also offers an opportunity to examine whether its own working methods are equipped for the volume and complexity of contemporary human rights information. More documents do not necessarily produce more accessible knowledge. The value of digital tools depends on whether their sources can be verified, diverse stakeholders understand their classifications and interfaces, and their insights are implemented.

Objectives and scope

This paper presents the findings and recommendations emerging from the roundtable **"Interpretation and Guidance in the Digital Age."**⁵ It was held on 18 June 2026 during the [Geneva Human Rights Hub's HRC@20 Annual Conference](#). The Geneva Human Rights Hub convened the roundtable with partners from OHCHR, civil society, academia, diplomatic missions, and organisations working on human rights information and digital diplomacy.

The paper stands on its own but forms the second part of a trilogy following the three days of the Annual Conference: standard-setting, guidance in the digital age, and implementation through stakeholder engagement. The first part examines how the Council and the wider UN human rights system interpret and apply existing standards to digital technologies and AI. The second considers how digital platforms can improve the coherence, accessibility and implementation of the Council's outputs. The final part sets out the main lessons learned and recommendations, placing the discussion within the

⁴ The UN Guiding Principles on Business and Human Rights were produced by a Special Procedures mandate and endorsed in 2011 by the UN Human Rights Council in its resolution [17/4](#).

⁵ The [event page](#) provides the public programme and list of convening partners.

Council's evolving resolutions, the work of its Advisory Committee and treaty-body guidance.

I. INTERPRETING AND APPLYING HUMAN RIGHTS IN THE DIGITAL AGE

From issue-specific responses to a system-wide human rights approach

Before becoming more systemic, the Council's digital work began with discrete questions: Internet access, freedom of expression, and privacy. The resolution [20/8](#) established the online/offline principle, followed by later resolutions on privacy in the digital age that addressed surveillance, profiling, automated decision-making, and data-intensive systems. The recurring Internet resolution addressed access, shutdowns, digital divides, and the role of businesses; and resolutions on civil society space, human rights defenders, and disinformation recognised how digital technologies shape participation and public debate.⁶

The dedicated digital-technology sequence deepened this approach. Resolution [41/11](#) requested an Advisory Committee study. The resulting [A/HRC/47/52](#) surveyed opportunities, risks, and challenges, helping place a broad range of rights, affected groups, and institutional responsibilities on the Council's agenda. Resolution [47/23](#) took note of that work and called for a human rights-based approach, appropriate safeguards, human oversight, and meaningful stakeholder participation. Resolution [53/29](#) requested OHCHR to map the work already produced by the Council and treaty bodies. The [mapping report A/HRC/56/45](#) showed that the UN human rights system had already developed substantial material across civil, political, economic, social and cultural rights; the principal gaps were visibility, coordination, accessibility and implementation rather than an absence of applicable norms.⁷

Resolution [59/11](#) then asked OHCHR to clarify State obligations and business responsibilities across the technology life cycle. OHCHR's resulting report, [A/HRC/62/33](#), makes human rights due diligence the operational bridge between existing law and AI governance. It calls for continuing assessment of systemic and cumulative harms; stronger safeguards in public procurement and State-business partnerships; transparency, independent oversight, contestability and remedy; and restraint or prohibition where high risks cannot be effectively mitigated.⁸

This progression matters. It confirms that the Council need not become a technical regulator or reproduce governance being developed elsewhere. Its comparative advantage is to insist that digital policy be assessed against universal rights and State

⁶ Relevant texts include resolutions [47/16](#) and [50/15](#) on the Internet, [54/21](#) on privacy, [53/13](#) on civil society space, [58/23](#) on human rights defenders and [62/9](#) on disinformation.

⁷ OHCHR, [Mapping report: Human rights and new and emerging digital technologies, A/HRC/56/45](#), 20 August 2024, especially paras. 58–66.

⁸ OHCHR, [Human Rights Due Diligence for AI and State Obligations under International Human Rights Law, A/HRC/62/33](#), 18 June 2026, paras. 44(a)–(j).

obligations, and that technical or economic objectives do not displace equality, participation, and accountability.

Existing law is the anchor, but it must be made operational

The discussion cautioned against treating AI as so exceptional that existing international law becomes irrelevant. That framing can open space for weaker voluntary principles and lengthy negotiations while harms continue. The preferable starting point is that international human rights law applies throughout a technology's life cycle and to the institutional arrangements.

At the same time, simply repeating general standards is not enough. Meaningful guidance must explain what legality, necessity, proportionality, equality, participation, transparency, and effective remedy require. Depending on the risk and context, this may include:

- prior and continuing human rights impact assessment, including cumulative and group-based effects through independent testing and audit, with access to information sufficient for oversight and research;
- consultation with affected people in accessible formats and at stages when they can still influence the decision, including a right to challenge decisions, obtain reasons and secure meaningful human review;
- documentation of intended purposes, data provenance, system limitations, and changes in use, including a public notice when an automated system is used in a public function;
- procurement terms that preserve oversight, access to evidence and remedies rather than shielding systems behind trade secrecy;
- suspension, withdrawal or prohibition when serious risks cannot be mitigated; and
- accessible remedies capable of addressing individual, collective and systemic harm.

These elements are not a separate “AI ethics” code. They are ways of discharging existing obligations in environments where opacity and private control make conventional oversight inadequate. Implementation cannot be reduced to a one-off technical risk score, as human rights due diligence is continuous, context-sensitive, and connected to accountability.

The full spectrum of rights must shape the agenda

While rights to privacy and freedom of expression remain central, a narrow frame obscures how digitalisation affects the indivisibility of rights. Automated welfare systems can determine social security and an adequate standard of living. Workplace surveillance and algorithmic management affect fair working conditions and freedom of association. Digital-only public services can exclude older persons, persons with disabilities, and people who lack connectivity or digital skills. Data centres and computational

infrastructure affect water, energy, climate, and the communities where resources are extracted. Recommendation systems and synthetic media affect freedom of opinion, education, and participation.

Economic, social and cultural rights are therefore not a secondary chapter of digital governance. Questions around who benefits from public investment, who bears environmental and labour costs, and whose languages and knowledge are represented remain central. The Committee on Economic, Social and Cultural Rights' [general comment No. 25](#) is especially important because it connects scientific progress to accessibility, non-discrimination, participation, and the prevention of harm.⁹

The human rights implications of AI in armed conflict and the military domain also require sustained attention. The Human Rights Committee has linked the right to life to autonomous weapons and loss of human control. At the same time, Council resolution [51/22](#) requested an Advisory Committee study on new and emerging military technologies.¹⁰ General-purpose models, commercial data, and dual-use infrastructure complicate the boundary between civilian and military applications.

Multistakeholder participation and safeguards against capture

Digital policymaking requires technical knowledge, but technical expertise should not be confused with authority to set the public interest. A small number of companies control important layers of the digital stack, ranging from cloud computing and platforms to subsea cables and satellite infrastructure. Their knowledge is indispensable, yet their commercial interests may conflict with the rights of users, workers and affected communities.

Meaningful multistakeholder participation therefore requires more than inviting representatives from different sectors. It should include transparent selection, disclosure and management of conflicts of interest, balanced representation, accessible documentation, adequate time to respond and protection for civil society participation. People affected by a system, including children, older persons, persons with disabilities, racialised communities, migrants, workers and communities affected by extraction or infrastructure, need a direct route into assessments and decisions. Independent researchers and human rights experts require access to data and systems sufficient to test official or corporate claims.

The same principle applies between Geneva and the national level. Council debates benefit from technical expertise, but domestic civil society organisations, NHRIs, equality bodies, regulators, and affected communities often hold the evidence needed to

⁹ Committee on Economic, Social and Cultural Rights, [general comment No. 25 \(2020\) on science and economic, social and cultural rights, E/C.12/GC/25](#), especially paras. 16–22, 28–35 and 45–52.

¹⁰ Human Rights Committee, [general comment No. 36 \(2018\) on the right to life, CCPR/C/GC/36](#), para. 65; Human Rights Council, [resolution 51/22](#), 7 October 2022.

understand implementation. Better connections between those levels would make Council guidance more grounded and ensuing recommendations more specific.

Complementary interpretive roles across the UN human rights system

The Council's value is amplified when its mechanisms work as an interpretive ecosystem rather than as parallel tracks.

The Advisory Committee can undertake cross-cutting research that is difficult to produce through political negotiation. As the Council's eighteen-member expert "think tank", it provides research-based advice at the Council's request but does not adopt binding decisions. Its 2021 digital-technologies study established a broad analytical foundation. Its later work on neurotechnology and the [impact of AI systems on good governance](#) shows how the Committee can examine emerging issues across rights and sectors before the Council decides whether further guidance, monitoring or standard-setting is needed.¹¹ Its contribution is greatest when the Council gives it a precise but sufficiently broad mandate, consults affected stakeholders, and then establishes a visible route for follow-up.

Special Procedures provide speed, thematic depth, and the capacity to respond to real-world practices. Mandate holders have analysed matters including digital surveillance, biometric identification, content governance, Internet shutdowns, digital health, online gendered harms, autonomous weapons, and the role of technology companies.¹² Their country visits, communications, and thematic reports connect abstract standards to specific decisions. The challenge is uneven coverage and limited coordination across mandates. A recurring technology coordination process or common index could identify overlaps and gaps without constraining mandate-holder independence.

The Universal Periodic Review (UPR) enables local evidence to reach Geneva through national reporting, UN information, and stakeholder submissions. More crucially, it has the breadth and political reach to bring digital rights into every State's implementation agenda. The roundtable heard that recommendations concerning digital technologies and AI rose from fewer than 50 in the first UPR cycle to almost 600 in the fourth. While many remain too general, their content has also expanded to include violence against women, children, work, and other economic and social rights. Recommendations are more useful when they identify the responsible institution, the measure required, the affected group, a time frame or indicator, and the applicable human rights standard.¹³

¹¹ See the Committee's [thematic reports](#), including A/HRC/47/52, A/HRC/57/61 and A/HRC/62/54. The 2026 good-governance study was requested in [resolution 57/5](#).

¹² The breadth of this work is mapped in [A/HRC/56/45](#). Representative reports include [A/HRC/44/24](#) on new technologies and assemblies, [A/HRC/48/31](#) on privacy and AI, [A/75/590](#) on digital border technologies and racial discrimination, and [A/HRC/43/29](#) on new technologies and economic, social and cultural rights.

¹³ The figures by UPR cycle were presented by Nicoletta Zappile (UPR Info) at the GHRH roundtable *HRC@20— Interpretation and Guidance in the Digital Age*, 18 June 2026, drawing on the [UPR Info Database of Recommendations and Voluntary Pledges](#); see also UPR Info, "[Human Rights Council at 20: What Impact?](#)", 19

Treaty bodies provide authoritative interpretations of binding human rights treaties. Their general comments and recommendations give the Council a stable legal foundation, while concluding observations show how these obligations apply in specific national contexts. The Human Rights Committee, for example, has developed important guidance on privacy, freedom of expression, peaceful assembly and the right to life. Other treaty bodies have addressed issues including racial and algorithmic profiling, gendered harms, children's rights, and accessibility. Much of this work predates the current AI debate and should be treated as core source material for Council resolutions, reports and UPR recommendations, rather than as a separate specialist literature.¹⁴

II. FUTURE-PROOFING THE COUNCIL'S HUMAN RIGHTS ECOSYSTEM

From document production to usable knowledge

The UN human rights system produces an extraordinary volume of resolutions, reports, recommendations, communications, and State submissions. The problem is no longer only whether guidance exists; it is whether a user can find, compare, verify and act on it. Similar questions may be addressed under different mandates without being connected; gaps can be mistaken for absence when relevant material is stored elsewhere, and small delegations or under-resourced organisations can face a participation disadvantage as they cannot follow every meeting and document stream due to fragmentation. Digital transformation can reduce these barriers if platforms can serve as common implementation infrastructure and help users move from a question to the authoritative source, understand how things relate to other mechanisms, and translate them into a decision or implementation step.

The emerging platform landscape

The roundtable presented complementary initiatives.

The HRC Mapper is designed to consolidate and visualise the Council's resolutions, mandates, reports and mechanisms. It can support analysis of mandate duration, reporting requirements, thematic coverage, overlaps and projected workload. Shared classifications derived from the Universal Human Rights Index (UHRI), combined with carefully supervised AI-assisted tagging, can enable more sophisticated analysis than

August 2026. Illustrative fourth-cycle outputs include Human Rights Council, *Report of the Working Group on the Universal Periodic Review: Republic of Korea*, [A/HRC/53/11](#), recommendations 139.89, 139.118, 139.124, 139.126 and 139.131, addressing AI and big-data surveillance, privacy, and online violence against women and children; and *Report of the Working Group on the Universal Periodic Review: India*, [A/HRC/52/11](#), recommendations 151.210 and 151.246, addressing the digital gender and equity divide and children's access to education. On precision and actionability, see UPR Info, "[SMART recommendations](#)".

¹⁴ For a detailed analysis of relevant treaty body output, see pp. 9 – 10 below.

document counts alone. Its future value will depend on multilingual access, transparent taxonomies, links to source documents and stable resources, and user feedback.¹⁵

The UN Human Rights Knowledge Gateway connects specialised knowledge hubs, the UN Human Rights Library, voting records, event information, and practice-oriented resources. Its emphasis on human curation and quality assurance aims to preserve the distinction between organising authoritative content in a way that helps users navigate approved material and silently generating new substantive guidance.¹⁶

The Universal Human Rights Index and National Recommendations Tracking Database connect international recommendations to country-level implementation. The UHRI brings together recommendations and observations from treaty bodies, Special Procedures, and the UPR and allows filtering by country, mechanism, theme, affected group, and Sustainable Development Goal. The NRTD allows national actors to allocate recommendations, record activities and indicators, and coordinate reporting. AI-assisted suggestions can reduce repetitive work, but States must retain responsibility for deciding what constitutes implementation and for checking whether an activity actually answers the recommendation.¹⁷

Diplo's AI-assisted reporting work responds to a different inequality: the informational capacity gap between large missions and smaller delegations. Tailored post-meeting briefs can help diplomats identify what a discussion means for their country's priorities. Training officials to build and adapt small tools can also reduce dependence on generic commercial products. Such services are helpful as long as they use public or authorised material, clearly identify sources, and preserve the distinction between a summary and an official record.¹⁸

The HURIDOCs Global Human Rights Repository seeks to connect international, regional, national and ad hoc human rights knowledge through shared, open infrastructure. Its premise is that access to information is a condition of participation and

¹⁵ OHCHR, [HRC Mapper](#), Public Beta v1.2 (accessed 16 September 2026). The Mapper was developed pursuant to the Human Rights Council President's statement [A/HRC/PRST/OS/18/1](#), *Efficiency of the Human Rights Council: addressing financial and time constraints*, 9 December 2024, and renewed by [A/HRC/PRST/OS/19/1](#), 8 December 2025. The use of UHRI-derived classifications and supervised AI-assisted tagging was described during the roundtable presentation.

¹⁶ OHCHR, [UN Human Rights Knowledge Gateway](#). The Gateway brings together OHCHR knowledge hubs, events and practices, the UN Human Rights Library's curated collections and research guides, Human Rights Council voting records, and verified human rights databases and platforms.

¹⁷ OHCHR, [Universal Human Rights Index](#). At the roundtable, OHCHR said the database contained about 272,000 recommendations and observations across about 70 mechanisms. Figures and development plans mentioned during the session should be treated as a snapshot as of 18 June 2026; OHCHR, [National Recommendations Tracking Database](#). See also OHCHR, [UN Human Rights Report 2025](#), reporting that the NRTD community had expanded to 20 countries and referring to the introduction of AI-enabled features.

¹⁸ DiploFoundation and the International Organisation of La Francophonie, ["Launch of a Programme for AI and Inclusive Multilateralism for Francophone Permanent Missions"](#), 11 May 2026; Jovan Kurbalija, ["Geneva AI Attaché: Technology for Inclusive, Informed, and Impactful Diplomacy"](#), 4 December 2024; and DiploFoundation, [AI Apprenticeship: Learning about AI by Developing AI](#), 2025.

accountability. While trustworthy stewardship, interoperability, security, and privacy remain essential, intelligent search and conversational interfaces can make dispersed material easier to discover.¹⁹

These projects perform complementary functions such as mapping the Council, connecting curated knowledge, organising recommendations, supporting diplomatic participation and building an open repository. Their value will come from interoperability and division of labour, not competition for a single “all-purpose” platform.

AI should support judgement, not displace it

The most consistent message across the interventions was that AI can assist with classification, translation, summarisation, and drafting suggestions, but cannot replace human judgement. This is especially important in human rights work, where meaning depends on legal context, lived experience, and careful distinctions between allegations, findings and recommendations.

Practical safeguards include limiting a system to a defined, trusted corpus; retrieving and displaying the underlying passage; recording document symbols and dates; testing for false citations, missing context, and discriminatory performance; allowing users to report errors; and requiring review before using material in an official process. If the corpus contains no answer, the system should say so. A plausible but unsupported response is more dangerous than a visible gap. Human oversight must itself be meaningful. A reviewer needs time, competence, access, and the authority to reject an output. “Human in the loop” language is insufficient where a person is expected to approve large volumes automatically or without sufficient understanding of conclusions. Some users or States may reasonably choose not to use AI functions, and opt-out routes should not prevent access to the underlying service.

Interoperability, provenance, and sustained use

The roundtable highlighted that digital tools will strengthen the human rights system only if they are interoperable, transparent, and traceable; preserve institutional knowledge; and are designed for sustained use by the people and institutions expected to rely on them. Human rights data are not neutral, as a thematic label can determine what becomes visible in a search, translation can alter legal meaning, and aggregation can erase minority positions or make a small number of recommendations appear unimportant. Therefore, users should be able to follow a chain from source to

¹⁹ HURIDOCs, [“Global Human Rights Repository: A Central Hub for Human Rights Data”](#), 2 February 2026. Developed with the Oxford Institute of Technology and Justice, the Repository is envisaged as an open, public Uwazi database linking documents from UN bodies and mechanisms, regional courts and commissions, national bodies and other institutions. It will use machine-learning tools and graph-data models to make this material searchable and machine-readable. See also [Uwazi](#) on the platform’s open-source architecture. The conversational search discussed during the roundtable remains a proposed feature of a repository whose framework is still under development.

classification, analysis, recommendation, and implementation record. This requires common identifiers, transparent and periodically evaluated taxonomies, machine-readable metadata, and interfaces that let systems exchange information while respecting permissions and data protection.

Platforms can also protect institutional memory during staff turnover and resource pressure if they are designed with a long-term perspective. National mechanisms, missions, and civil society organisations repeatedly relearn how to implement recommendations because previous practice is dispersed or lost. Structured records of decisions, responsible institutions, indicators, obstacles and successful approaches can preserve knowledge.

Yet, even a technically strong platform has little value if intended users do not know it exists, cannot access it in their language, do not trust its results, or if States and stakeholders keep updating it. Governance, maintenance, outreach and feedback are therefore substantive parts of a digital project. Adoption requires training, multilingual and accessible interfaces, low-bandwidth options, clear user support and sustained engagement with users. It also requires realistic budgeting for maintenance and iterative improvement. Capacity-building should not create dependence on a particular vendor or institution. Users need enough understanding to interrogate results, recognise limitations, and choose when not to automate. Open standards, export functions, and reusable data enable users to build context-appropriate tools while preserving the integrity of authoritative sources.

III. MAIN LESSONS LEARNED AND KEY RECOMMENDATIONS

1. Consolidate the Council's role as the human rights anchor for digital governance

The Council should present its digital work as a coherent body of interpretation rather than a succession of isolated resolutions. The core sequence begins with the online/offline principle in [resolution 20/8](#), continues through [41/11](#), [47/23](#), [53/29](#) and [59/11](#), and is complemented by recurring resolutions on the Internet, privacy, civil society space, human rights defenders and disinformation.²⁰ In July 2026, [resolution 62/11](#) on freedom of opinion and expression added timely guidance on AI-enabled threats and the need to refrain from systems that cannot be operated consistently with human rights.

Future resolutions should build on this acquis, link new mandates to previous findings, and avoid resetting the debate with each technological development. The Council need not duplicate specialised bodies on technical standards, cybersecurity, trade or weapons. It should ensure their work is assessed against human rights obligations and that affected people can participate. This is especially important when governance prioritises innovation, security or competitiveness over equality, remedy and distributional impacts.

²⁰ For an official overview, see OHCHR, [Digital space and human rights](#), and the mapping in [A/HRC/56/45](#).

The Council should also keep the agenda broad. Digital policy must address civil and political rights alongside economic, social, and cultural rights; direct uses of AI alongside the data, labour, energy, water, and infrastructure it depends on; and civilian applications alongside military, border, and security uses. Its work on defenders in [resolution 58/23](#), on military technologies in [resolution 51/22](#), and on privacy and AI in reports [A/HRC/48/31](#) and [A/HRC/60/45](#) should be read as parts of the same landscape.

2. Translate existing obligations into practical, risk-sensitive guidance

The main protection gap is implementation. The Council and OHCHR should prioritise guidance that enables legislators, regulators, public authorities, NHRIs, businesses, and civil society to determine what compliance requires in a given context. [A/HRC/62/33](#) supplies a strong common framework: continuous human rights due diligence across the AI life cycle; assessment of systemic, cumulative and group-based harms; transparency and participation; independent oversight; human review and contestability; and accessible remedy.

That framework should be operationalised in high-risk fields, including policing, migration and borders, welfare, health, education, employment, justice, elections, public information and the military. Public procurement deserves particular attention because it is where States can require impact assessments, access to documentation, independent testing, contractual remedies, and termination rights. The Working Group on Business and Human Rights' report on [AI procurement and deployment, A/HRC/59/53](#), and OHCHR's report on applying the UN Guiding Principles to technology companies, [A/HRC/59/32](#), should be used together with [A/HRC/62/33](#)²¹

Guidance should include genuine limits. Where a use presents serious risks that cannot be prevented or mitigated because it depends on indiscriminate surveillance, reproduces unlawful discrimination, removes meaningful human control, or makes effective remedy impossible, the appropriate response may be a moratorium, withdrawal, or prohibition. States should not treat an impact assessment as permission to proceed regardless of its findings.

3. Use the Advisory Committee, Special Procedures, treaty bodies and UPR as one interpretive ecosystem

The Council should give its Advisory Committee a deliberate research role in emerging-technology policy. The Committee's foundational [2021 study, A/HRC/47/52](#), its [2024 study on neurotechnology, A/HRC/57/61](#), and its [2026 study on AI and good governance, A/HRC/62/54](#), show the value of cross-rights, cross-sector analysis.²² Future mandates should include a follow-up plan: presentation to relevant Special Procedures and treaty

²¹ OHCHR, [Practical application of the Guiding Principles on Business and Human Rights to the activities of technology companies, including activities relating to artificial intelligence, A/HRC/59/32](#); Working Group on business and human rights, [Artificial intelligence procurement and deployment: ensuring alignment with the Guiding Principles on Business and Human Rights, A/HRC/59/53](#).

²² Human Rights Council Advisory Committee, [A/HRC/47/52, A/HRC/57/61 and A/HRC/62/54](#).

bodies, a Council discussion focused on implementation options, integration into OHCHR guidance and UPR tools, and a public record of action taken.

The Council and OHCHR should also maintain a living, searchable map of relevant Special Procedure reports, treaty-body interpretations and country recommendations. Coordination should reveal gaps and reduce unnecessary duplication without flattening different mandates. The 2024 OHCHR mapping report already provides the foundation and recommends improved information infrastructure, closer coordination, deeper technical capacity and a stronger advisory service for human rights in the digital space.²³

Treaty-body guidance should be treated as an essential part of this acquis. As of September 2026, no cross-committee general comment on AI exists. However, there is a substantial body of generally applicable guidance, supplemented by many country-specific concluding observations:

- The **Human Rights Committee** has addressed computerised personal data and surveillance in general comment No. 16; online expression, platform restrictions and access to information in [general comment No. 34](#); autonomous weapons and human control under the right to life in [general comment No. 36](#); and online or hybrid assemblies, Internet shutdowns, digital surveillance and facial recognition in [general comment No. 37](#).²⁴
- The **Committee on Economic, Social and Cultural Rights** connects scientific and technological progress to equality, accessibility, participation, risk prevention and the digital divide in [general comment No. 25](#). Its [general comment No. 24](#) on State obligations in the context of business activities provides the due-diligence and remedy framework relevant to technology companies.²⁵
- The **Committee on the Elimination of Racial Discrimination** addresses online racist hate speech in general recommendation No. 35 and gives the most detailed treaty-body guidance on algorithmic profiling by law enforcement in [general recommendation No. 36](#). It calls for impact assessment, transparency, independent oversight and audit, continuing monitoring, procurement safeguards and non-use where discrimination risks are too high.²⁶
- The **Committee on the Elimination of Discrimination against Women** addresses technology-mediated gender-based violence in [general recommendation No. 35](#), the gender digital divide in education in [No. 36](#), technology-facilitated trafficking in [No. 38](#),

²³ OHCHR, [A/HRC/56/45](#), paras. 58–66.

²⁴ Human Rights Committee, general comment No. 16 (1988) on article 17 of the Covenant, contained in [HRI/GEN/1/Rev.9 \(Vol. I\)](#); [general comment No. 34](#), paras. 12, 15, 21–36 and 43; [general comment No. 36](#), para. 65; and [general comment No. 37](#), paras. 13, 34, 61–62 and 94.

²⁵ Committee on Economic, Social and Cultural Rights, [general comment No. 25](#) and [general comment No. 24](#).

²⁶ Committee on the Elimination of Racial Discrimination, [general recommendation No. 35 \(2013\)](#), [CERD/C/GC/35](#), and [general recommendation No. 36 \(2020\)](#), [CERD/C/GC/36](#), especially paras. 33–42 and 53–66.

digital access and online violence affecting Indigenous women and girls in [No. 39](#), and AI, algorithmic bias and women's equal participation in decision-making in [No. 40](#). Its 2026 [addendum to general recommendation No. 30](#) adds guidance on AI-facilitated violence, deepfakes, digital exclusion and AI in conflict.²⁷

– The **Committee on the Rights of the Child** provides the most comprehensive treaty-body treatment of a digital environment in [general comment No. 25](#). It applies all children's rights to AI, algorithms, biometrics, data analytics and platform design, with detailed guidance on non-discrimination, best interests, participation, privacy, safety, business responsibility and remedy. The Committee and UN partners' [Joint Statement on Artificial Intelligence and the Rights of the Child](#) further consolidates a child-rights approach to AI.²⁸

– The **Committee on the Rights of Persons with Disabilities** establishes that accessibility obligations extend to information and communications technologies in [general comment No. 2](#), and addresses AI, digitalisation and the changing world of work in [general comment No. 8](#). These texts require digital inclusion to be designed as a right, not added later as an accommodation.²⁹

Other treaty bodies, including the Committees against Torture, on Enforced Disappearances and on Migrant Workers, have engaged relevant technologies through concluding observations and operational contexts such as surveillance in detention, electronic monitoring, digital evidence, border systems and identification. They have not yet issued dedicated general guidance on AI comparable to the instruments above. OHCHR's [A/HRC/56/45](#) and the [Universal Human Rights Index](#) should serve as entry points to the growing country-specific record rather than presenting any static list as exhaustive.

UPR recommendations should draw explicitly on this guidance and become more specific. States making recommendations should identify the relevant treaty standard, the technology or decision context, the necessary measure and the people affected. States under review should be encouraged to report on digital systems used in public functions, impact assessments, oversight, and remedies. Civil society and national institutions need support to submit evidence of impacts otherwise hidden by technical opacity or commercial secrecy.

²⁷ Committee on the Elimination of Discrimination against Women, general recommendations [No. 35](#), [No. 36](#), [No. 38](#), [No. 39](#), [No. 40](#) and the [addendum to No. 30](#).

²⁸ Committee on the Rights of the Child, [general comment No. 25 \(2021\)](#), [CRC/C/GC/25](#), and [Joint Statement on Artificial Intelligence and the Rights of the Child](#), November 2025. See also the Committee's 2019 [guidelines regarding implementation of the Optional Protocol on the sale of children, child prostitution and child pornography](#), [CRC/C/156](#), which address technology-facilitated offences and protection.

²⁹ Committee on the Rights of Persons with Disabilities, [general comment No. 2 \(2014\)](#), [CRPD/C/GC/2](#), and [general comment No. 8 \(2022\)](#), [CRPD/C/GC/8](#).

4. Address corporate concentration and accountability across the technology stack

The Council should look beyond the entity directly presenting an AI system to the chain of actors that make it possible. Developers, model providers, data brokers, content moderators, cloud and chip providers, platforms, consultants, and public authorities may each influence the risk. Concentration at infrastructure and distribution layers can shape civic space and public access as strongly as an individual algorithm.

States should implement a smart mix of mandatory and voluntary measures consistent with the UN Guiding Principles on Business and Human Rights. This includes mandatory due diligence for high-risk technology activities; competition, procurement and data-governance rules that protect human rights; disclosure sufficient for oversight; independent auditing; protection for researchers and whistle-blowers; and effective judicial and non-judicial remedies. Investors should use leverage and contractual relationships to require due diligence at the design stage, not only after deployment.

Corporate participation in Council processes should be transparent and balanced. Conflict-of-interest safeguards are necessary where firms that design or sell the systems under discussion also provide technical advice or infrastructure to the process. Civil society's ability to participate, criticise and investigate must be protected. Access to relevant data and documentation is particularly important because independent scrutiny cannot rely entirely on corporate descriptions of system performance.

5. Make inclusion and participation measurable across the technology life cycle

"Multistakeholder" should describe how a decision is made, not only who was invited. The Council and States should require early, accessible, and continuing participation by those affected; publish how input changed the proposal; disclose conflicts of interest; and provide reasons when recommendations are rejected. Participation should be resourced so that under-represented groups and organisations can contribute on equal terms.

Digital inclusion also requires preserving meaningful non-digital routes to essential services. A person should not lose access to essential services because of age, disability, language, location, poverty or lack of digital skills. Accessibility, affordability, connectivity, digital literacy and safety should be assessed together. Disaggregated monitoring should identify who benefits, who is excluded, and who bears environmental or labour costs. The Council's digital consultations and platforms should model these standards through multilingual, accessible design; low-bandwidth options; data minimisation; clear consent and privacy protections; and routes for correction and redress. Civil society and affected communities should be connected more directly to Geneva discussions and to follow-up at country level.

6. Build a trustworthy, interoperable, and human-governed digital ecosystem for implementation

The HRC Mapper, Knowledge Gateway, UHRI, NRTD, Diplo reporting initiatives and HURIDOCS repository should be supported as complementary public-interest infrastructure. Their development should follow a shared set of principles:

- authoritative source documents remain accessible and machine-generated material is visibly labelled;
- common document identifiers, taxonomies and metadata permit systems to exchange information;
- classifications, [translations](#) and summaries have documented provenance and a correction process;
- personal and sensitive data are minimised and protected by design;
- accessibility, multilingualism and low-bandwidth access are treated as core requirements;
- independent testing examines accuracy, missing context, discriminatory performance and security;
- human reviewers have the time, competence, sources and authority needed to reject AI output;
- users can access core services without being compelled to use AI functions; and
- long-term budgets cover governance, maintenance, outreach, feedback and training.

OHCHR's recently launched [Human Rights Data Exchange \(HRDx\)](#) represents a particularly promising step in this direction.³⁰ Conceived as an open and authoritative service that connects fragmented human rights information and brings together legal, statistical, thematic, and open-source evidence, it could provide a shared access and analytical layer across existing systems rather than becoming another stand-alone repository. It should be kept in mind that the information included and omitted will shape which situations and risks become visible. While automated connections and summaries must remain traceable, explainable, and open to correction; sensitive information will require differentiated access and strong protection, and integration with other platforms should preserve their mandates, ownership and specialised value. If developed with transparent governance and clear links to sources, HRDx could make patterns and emerging risks easier to identify, reduce the time spent retrieving and reconciling information, and help smaller missions, national mechanisms, NHRIs, and civil society use evidence more effectively.

³⁰ See [Global Alliance for Human Rights, "RightsX Summit"](#), which identifies HRDx as part of the future-ready human rights system and describes it as a prospective digital backbone. This refers to its continued development and wider operational rollout following its public presentation at AI for Good in July 2026.

Realising this potential, both for HRDx and for the wider ecosystem of human rights platforms, will require more than improvements to individual tools. OHCHR and participating organisations should establish a lightweight coordination arrangement for interoperability and user governance, with representation from all stakeholders. This arrangement should not centralise data ownership or subsume the distinct mandates of participating initiatives. Rather, it should facilitate common interfaces and safeguards, help identify duplication and gaps, and allow users to move more easily from Council outputs and other human rights information to country-level implementation.

The measure of success for HRDx and the broader digital ecosystem should not be the number of documents indexed or summaries produced; it should be whether a small mission can participate more effectively; whether a national mechanism can allocate and track a recommendation; whether civil society can find and challenge a decision; whether an expert can trace a claim to its source; and, ultimately, whether rights-holders obtain better protection and remedy. Digital tools should strengthen human judgement, institutional memory, and accountability, not replace the relationships and deliberation on which human rights protection depends.