



THE ROLE OF RELIGIOUS LEADERS AS HUMAN RIGHTS DEFENDERS

DECEMBER 2015

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1. BACKGROUND

2015 saw a continued crackdown on human rights organisations and human rights defenders (HRDs) around the world. HRDs face multiple challenges including *de jure* restrictions in the form of restrictive legislation, extensive bureaucratic hurdles, as well as harassment, intimidation, violence, murder and torture. In his opening remarks at the 30th Human Rights Council (HRC) session in September 2015, the UN High Commissioner for Human Rights Zeid Ra'ad Al Hussein highlighted the persecution of civil society as one of his key concerns, and criticised the Council members for enacting overly restrictive legislation limiting the work of civil society organisations.¹ Meanwhile, in his report to the UN General Assembly in 2015, Special Rapporteur on Human Rights Defenders Michel Forst drew attention to the 'disturbing increase in the number of reprisals and acts of intimidation reported by defenders.'² The UN Secretary General has also highlighted the widespread intimidation and reprisals against HRDs collaborating with the UN, and indicated that the reprisals, which are becoming more severe and varied, undermine the United Nations.³

The international community increasingly recognises that HRDs play a critical role in promoting human rights. The UK government announced in early 2015 that it will provide more funding for projects designed to protect civil society space. The government also continues to monitor the situation for human rights defenders, observe trials, lobby for the release of human rights defenders and provide training to HRDs in various parts of the world. As part of this, the Foreign and Commonwealth Office (FCO) produced an HRDs toolkit for UK Missions and their staff overseas.

Promoting space for civil society to operate is also a long-established element of the EU external policies; for example, in 2014 the EU strengthened the focus of the European Instrument for Democracy and Human Rights (EIDHR) on HRDs for the period 2014-2020. The EU has also recognised the work of HRDs through the Sakharov Prize for Freedom of Thought, a prestigious human rights award established in 1988. Furthermore, through its Guidelines on HRDs adopted in 2004, the EU sets out an extensive list of activities through which it continues to support HRDs, including practical support, visiting detained HRDs, monitoring their trials and advocating for their protection.

1 Opening Statement by UN High Commissioner for Human Rights Zeid Ra'ad Al Hussein at the 30th session of the Human Rights Council, 14 September 2015 www.ohchr.org/EN/NewsEvents/Pages/DisplayNews.aspx?NewsID=16414&LangID=E

2 Situation of human rights defenders, 70th Session of the General Assembly, Item 73b of the Provisional Agenda, A/70/217, 30 July 2015

3 Report of the UN Secretary General on Cooperation with the UN, its representatives and mechanisms in the field of human rights, A/HRC/30/29, 17 August 2015

Despite the increased focus on HRDs and wider civil society space, the role and potential of religious leaders and faith communities in promoting human rights is still not fully recognised. Even though their participation in human rights processes is nowadays more visible, their unique role in promoting human rights is frequently not included in official reports or discussed in international arenas. For instance, the recent report of the Special Rapporteur on the situation of human rights defenders draws attention to the experiences of groups of defenders who are most at risk (such as women HRDs, defenders of land rights or defenders combating corruption), and analyses global trends in the human rights environment, but does not make any reference to religious communities or leaders, or even members of religious minorities.⁴

Across the world, Christian Solidarity Worldwide (CSW) engages with a wide range of HRDs: lawyers, activists, religious leaders, students and journalists who promote freedom of religion or belief in the context of wider human rights. We are deeply concerned by the severe intimidation and harassment faced by many of our partners. For instance, in Pakistan we have observed a shrinking of civil society space that has had a negative impact on HRDs, religious leaders and lawyers, especially for those working on sensitive human rights issues such as blasphemy cases, and those who defend the rights of religious minorities. In China approximately half of the country's most prominent human rights lawyers, many of them Christians, have been detained by the government since 10 July 2015. At least 20 of the over 300 HRDs interrogated during this period, as well as those connected to them, have vanished into China's prison system or are being held incommunicado in undisclosed locations. Some of them have been released but remain under threat of re-arrest at any time.

CSW has also received concerning reports of severe intimidation and harassment of members of faith communities and religious leaders. Many religious leaders and members of faith communities who engage with human rights, face great risks due to their work. In India, HRDs promoting freedom of religion or belief and freedom of expression have been targeted with vilification and hate speech. For instance, John Dayal, a member of the National Integration Council (NIC) and former President of the All India Catholic Union, and his family members have been intimidated and have received serious threats to their lives – threats which have also been publicly expressed on social media platforms such as Twitter.



4 Situation of human rights defenders, 70th Session of the General Assembly, Item 73b of the Provisional Agenda, A/70/217, 30 July 2015

Despite reporting the threats to the police, no action has been taken and Mr Dayal and his family continue to live in fear.

In Colombia, illegal armed groups such as the FARC-EP and the ELN have a long history of persecuting religious groups and leaders, especially those engaging with social justice issues. Over the course of the 50-year internal conflict in Colombia, hundreds of church leaders have been assassinated by both these groups. In January 2015 a major neo-paramilitary group, the Black Eagles, published a death threat listing the names of 39 civil society leaders. The list included five Protestant religious leaders who have probably been targeted because of their strong social work with victims of the conflict, including Internally Displaced Persons (IDPs).

In Cuba, the government has taken action to separate HRDs from faith organisations in order to isolate them and prevent them from 'infecting' religious groups with their ideas. Many church leaders are under severe pressures from the government to expel or ban anyone associated with human rights from their organisations. Church leaders who refuse to comply with the government policy have been targeted with repressive measures such as the freezing of their bank accounts, threats of church closure, threats against members of their congregation and even threats against their children.

Restrictions on the religious freedom of religious HRDs continue in China. Leaders of several churches with Christian HRDs have been warned not to let them attend the church services, or the churches will be closed down or destroyed.

The purpose of this report is to draw attention to the role of religious leaders as HRDs, and to encourage members of the international community⁵ to take a more comprehensive approach in engaging with religious leaders and members of faith communities who work as HRDs. While recognising the role of religious communities in promoting freedom of religion or belief (FoRB), this background paper draws attention to the important contribution of religious leaders who work as HRDs.

2. WHO ARE HUMAN RIGHTS DEFENDERS?

The role of human rights defender has a broad definition:

*Defenders are active in support of human rights as diverse as the rights to life, to food and water, to the highest attainable standard of health, to adequate housing, to a name and a nationality, to education, to freedom of movement and to non-discrimination.*⁶

⁵ This report uses the term 'international community' to mean a wide range of international stakeholders such as UN member states; various UN human rights mechanisms such as the Human Rights Council, General Assembly, UN Treaty Bodies and Special Procedures; the EU; the OSCE; the Council of Europe; the African Union; and the Organization of American States.

⁶ *Human Rights Defenders: Protecting the Right to Defend Human Rights*, Fact Sheet No. 29 1.A.1. p.2

A human rights defender is not defined by 'the person's title or the name of the organisation he or she works for.'⁷ Rather, HRDs are those who act to advance human rights, monitor, train, advocate and protect human freedoms on behalf of others, within the framework of the Universal Declaration of Human Rights and other international conventions. By the very nature of their work HRDs in many parts of the world face many risks and obstacles such as harassment, psychological and physical abuse, social and educational inequalities, and inadequate protection. Perpetrators of violations committed against HRDs include non-state actors such as social communities and extremist groups, as well as state actors. It is extremely shocking that state actors – who have a responsibility to protect HRDs under international human rights law – continue to fail to register and investigate reprisals against HRDs, or to provide adequate protection.

Women HRDs are often more vulnerable as they are also faced with risks specific to their gender. They often challenge social norms about gender roles, an act which may render them more vulnerable to reprisals. Furthermore, the forms of violence or harassment targeting women HRDs may take a gendered form, such as sexual violence or humiliation.

In many parts of the world, religious leaders such as priests, imams, rabbis, nuns and other key members of faith-based organisations engage with various human rights initiatives. Often religious leaders are compelled to do this because they may be the only stakeholders with access to platforms to bring the grievances of their respective communities to the attention of those who can help. For instance, in northern Nigeria many religious leaders have found themselves compelled to become voices crying for justice following religiously motivated violence and murders. They are often respected within their communities and sometimes have greater legitimacy within and access to their communities than do government agencies. Faith-based organisations frequently provide key social services to local communities, and may have the opportunity to mobilise their members to promote human rights.

3. HRDS AND THE RIGHT TO BE PROTECTED WITHIN THE UN SYSTEM

On 8 March 1999 the UN General Assembly adopted a Resolution first initiated by the Commission on Human Rights in 1998:⁸

53/144. Declaration on the Right and Responsibility of Individuals, Groups and Organs of Society to Promote and Protect Universally Recognized Human Rights and Fundamental Freedoms

⁷ *ibid.*, 1.B.1 p.6

⁸ Official Records of the Economic and Social Council, 1998, Supplement No. 3 (E/1998/23), chap. II, sect. A

This was simplified and became the Declaration on Human Rights Defenders.⁹ The Declaration establishes that states have the obligation to guarantee the right of everyone, individually or together with others, to promote and protect human rights both at national and international levels. The Declaration rests on the foundations of the UDHR and subsequent human rights conventions.¹⁰ Regional guidelines and statements on HRDs have also been developed in Asia,¹¹ Africa,¹² Europe¹³ and Latin America.¹⁴

In 2004 the UN established a mandate for a Special Rapporteur on the situation of human rights defenders, to strengthen the implementation of the Declaration and monitor the challenges facing HRDs.¹⁵ The current Special Rapporteur, Michel Forst, has been in post since June 2014. While the international mandate has no legally binding power, the Special Rapporteur is mandated to hold national governments to account. In their annual reports to the UN Human Rights Council (HRC), the mandate holder itemises particular cases of concern and solicits annual updates from national governments.

There have also been several important resolutions on Human Rights Defenders. For instance, in November 2015 a UN General Assembly Resolution recognised the need for the protection of HRDs by passing an important resolution on this topic. The resolution was passed with 117 countries voting for the resolution and 14 countries voting against it, including China, Russia, Burma (Myanmar), North Korea, Sudan and Pakistan. The new resolution expresses concerns over misuse of national security and counter-terrorism legislation to target HRDs and urges states to ensure that such legislation does not undermine the work and safety of HRDs. It also calls upon states to adopt strong and effective measures for the protection of HRDs.

9 *Human Rights Defenders: Protecting the Right to Defend Human Rights*, Fact Sheet No. 29

10 OHCHR, *Commentary to the Declaration on the Right and Responsibility of Individuals, Groups and Organs of Society to Promote and Protect Universally Recognized Human Rights and Fundamental Freedoms*, July 2011 www.ohchr.org/Documents/Issues/Defenders/CommentarytoDeclarationondefendersJuly2011.pdf

11 6th Asian Regional Human Rights Defenders Forum (AHRDF6) Manila Declaration II, December 2014 www.forum-asia.org/?p=18169

12 A Special Rapporteur on Human Rights Defenders was established by the African Commission on Human and Peoples' Rights with the adoption of Resolution 69 at the 35th Ordinary Session held in Banjul, The Gambia, 21 May-4 June 2004.

13 Consilium, *Ensuring Protection – European Union Guidelines on Human Defenders* www.consilium.europa.eu/uedocs/cmsUpload/GuidelinesDefenders.pdf

14 A gathering of human rights defenders in Latin America was held on 5 and 6 December 2011 in Buenos Aires, with the participation of representatives from social and human rights organisations in Argentina, Paraguay, Brazil, Bolivia, Chile, Honduras, Uruguay, Peru, Colombia, Venezuela, Guatemala, Mexico, El Salvador and Nicaragua.

15 Resolution 2000/61 establishing the mandate

It has been evident from these annual reports that HRDs have not been adequately recognised by governments,¹⁶ and that the space for civil society and defenders has been significantly shrinking in many parts of the world.¹⁷

4. THE ROLE OF FAITH COMMUNITIES AND LEADERS IN THE PROMOTION OF FORB

Adequate recognition should be given to religious leaders and their communities which engage in promotion of human rights. Freedom of religion or belief is a particularly sensitive and widely contested human right and thus, HRDs engaging with the protecting this right should receive recognition and support from international human rights mechanisms.

The debate on the role of religion in the promotion of human rights often has an underlying tendency to identify religion as an obstacle to human rights, and does not acknowledge the role and capacity of religious leaders and faith communities as HRDs.¹⁸ The point here is not to wholly vindicate religious communities: we recognise with regret that extreme religious convictions and ideologies are often responsible for human rights abuses, and on occasion there is a link between religious interpretations and oppression. A 2014 report, *Violence in the Name of Religion*, by Special Rapporteur on freedom of religion or belief, Heiner Bielefeldt, dealt specifically with this issue.¹⁹

However, it remains vital to increase global understanding of religion and its potential to create a basis for strengthened implementation and promotion of human rights. The role of religious communities and leaders already undertaking human rights work must also be acknowledged, and their capacity to promote human rights increased.

In order to advance human rights effectively, promote a pluralistic and participatory approach, and ensure that conversations surrounding human rights reach beyond the official, secular human rights environment and include all layers of society, it remains crucial to establish a comprehensive strategy on Human Rights Defenders which adopts a more intentional inclusion of religious leaders as HRDs. There are a number of reasons for this:

- Regarding freedom of religion or belief, members of religious communities and religious leaders have an essential role both as rights holders and in many cases as active agents promoting this right. It is important to recognise that there are various initiatives by faith communities and leaders aiming at wider realisation of ForB. For example, on 3 June 2015 faith communities in the UK launched a new catalyst for action on ForB, the Inter-religious Partnership for ForBS (abbreviated to

16 Report of Special Rapporteur on the situation of human rights defenders, Margaret Sekaggya, UN General Assembly, Human Rights Council Twenty fifth session A/HRC/25/55 Agenda item 3, 23 December 2013 p.9

17 for instance, *ibid*, p.10

18 *ibid*, p. 20, 41, 61, 65, 67.

19 Report of Special Rapporteur, 29 December 2014, A/HRC/28/66

IRP18 in order to emphasise its relationship to Article 18 of the UDHR). Various international institutions are increasingly recognising the importance of engaging with faith communities and faith leaders. The collaboration between Religions for Peace and Kofi Annan to equip religious leaders, in response to the Millennium Development Goals, was an early example of this trend.²⁰ At the launch of UNICEF's Partnering with Religious Communities for Children in 2012, Executive Director Anthony Lake said:

Long before there was a UNICEF, faith communities were among the greatest advocates for the world's neediest children, providing guidance, aid and comfort to millions of disadvantaged families. In fact, the Convention on the Rights of the Child – the most widely ratified human rights treaty in the world – reflects deeply-held values embedded within religious traditions that uphold the inherent dignity of every child and the centrality of the family in building strong communities.²¹

- According to the Pew Research Center, the number of religious communities is set to rise proportionately higher than the 'unaffiliated' population by 2050.²² This means that the proportion of religious leaders and wider faith communities directly and indirectly involved in defending a wide variety of human rights will inevitably increase. Understandably, the relationship between religious dogma and human rights abuse raises concerns about the role of religion in human rights abuse; yet faith communities also play a leading role as human rights champions.
- Pew's 2015 report also finds that restrictions on religious communities have remained 'high or very high in 39% of countries'. This represents some 77% of the world's population including some of the most populous countries.²³ It is important to raise questions about the role of faith in these socio-political contexts, and it is highly likely that significant numbers of HRDs will emerge, motivated by their religious convictions.
- In recent years institutions such as the World Bank, UNICEF, the UNDP and the UN Secretary General have all acknowledged the indispensable role faith communities play in development and emergency and disaster relief, as well as poverty alleviation. However, the international

human rights community should be more intentional in seeking out and harnessing the grass roots presence, experience and infrastructural power of religious leaders as HRDs; and tailor more comprehensive strategies to increase the engagement and build the capacity of religious leaders to strengthen human rights in their communities.

We would like to highlight that this briefing does not seek to act as a defence of faith, or a special pleading for religious leaders. The aim is rather to enhance the capacity and effectiveness of human rights mechanisms, by acknowledging the diverse and powerful role religious leaders and members of faith communities may play in promoting human rights. We believe that a false dichotomy between religious communities and human rights undermines the promotion and protection of universally recognised human rights and fundamental freedoms.

5. SNAPSHOT STORIES: FAITH-BASED PROMOTION OF HUMAN RIGHTS



Siddika Gulamhusein works with the Al-Khoei Foundation, the largest Shi'a Muslim organisation in the world, which also has General Consultative Status with ECOSOC. Ms Gulamhusein works to promote freedom of religion, tolerance and justice for religious groups worldwide and actively supports all initiatives fostering peaceful cooperation between religious and non-religious groups. Her specific role includes representing the Foundation at the United Nations during HRC sessions.

Al-Khoei is especially concerned about the rise of extremism and religious intolerance stemming from Wahhabism, which threatens global security. The targeting of religious minorities has now become a widespread phenomenon with the growth of ideologies preaching hate and discrimination in the name of religion. Banning or restricting freedom of worship as well as state and private funding has allowed terrorist groups and fringe cells to grow. Ms Gulamhusein is working to overcome hate speech propagated through dedicated campaigns,

²⁰ Religions For Peace, *Faith in Action: Working Toward the Millennium Development Goals* www.worldvolunteerweb.org/fileadmin/docdb/mdg_faith_toolkit.pdf

²¹ UNICEF, 'Partnering with Religious Communities for Children', 4 December 2013 www.comminit.com/polio/content/partnering-religious-communities-children

²² According to Pew, as of 2010 Christianity was by far the world's largest religion, with an estimated 2.2 billion adherents, nearly a third (31%) of the 6.9 billion people on Earth. Islam was second, with 1.6 billion adherents, or 23% of the global population. Pew Research Center, 'The Future of World Religions: Population Growth Projections, 2010-2050', 2 April 2015 www.pewforum.org/2015/04/02/religious-projections-2010-2050/

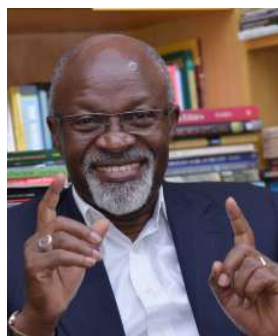
²³ Pew Research Center, 'Latest Trends in Religious Restrictions and Hostilities', 26 February 2015 www.pewforum.org/2015/02/26/religious-hostilities/

social media and satellite channels. In her role as an HRD, she believes the UN should work to dismantle the social media network of Daesh (Islamic State), al-Qaeda and similar organisations, in order to prevent the further spread of their ideology; demand educational reforms to encourage freedom of religion, plurality, and respect of religious traditions and minorities; and implement mechanisms to hold non-state actors accountable for their crimes.



Sr Deepa Fernando is an educationalist with the Catholic Order of the Holy Family Congregation in Sri Lanka. She plays a central role with the Christian Solidarity Movement (CSM) and is a member of the Justice, Peace and Integrity of Creation (JPIC) of the Religious Congregations. She also works with the Family of Disappearances NGO and National Fisheries Solidarity Organization (NAFSO).

In the CSM and as an HRD she has called the attention of the Sri Lankan government and the UN to enforced disappearances. Since 2012 Sr Fernando has worked with civil society groups to reclaim the village of Mullikulam in Mannar district (North), from which the inhabitants were evicted by the military during the war in Sri Lanka. Sr Deepa is also involved in providing a watching brief on the human rights and welfare of prisoners in Welikade Prison. More recently, she has actively campaigned against the Colombo Port City Project – a 233 hectare development in which 266 acres will be given directly to China. The concern is that local communities will be displaced, and infrastructural development will benefit commercial interests at the expense of local businesses, especially local fishermen. This high profile campaign has had some impact on the government's response to the proposals.



Bishop David Zac Niringiye is a theologian, Bible teacher and human rights activist, who has served in a variety of senior ecclesiastical positions in a number of organisations. Bishop Niringiye holds an honours degree in Physics from Makerere University, a Masters degree in Theology and a PhD in Theology and Mission History from Edinburgh University.

In 2012 he resigned as Assistant Bishop providing episcopal oversight to Kampala Diocese, in order to commit himself to the fight against corruption in Uganda. As an outspoken critic of President Museveni's administration he was a founding member of the Black Monday Movement, a civil society group challenging corruption in Museveni's government.

The movement focuses on the effects of corruption on the quality of public education and public health, which it regards as a 'theft of public resources', robbing the country of quality education and stealing the future of Uganda's children. While the Universal Primary Education introduced in 1997 gave hope and provided education for many more children, factors including hunger and a lack of teachers and adequate facilities have undermined Ugandan children's access to education. Bishop Niringiye has personally refused to eat lunch until children in Uganda receive the free lunches to which they are entitled. His activism has also focused on healthcare, in a country in which the maternal mortality rate stands at 19 per day, due to corruption.

Apart from his commitment to justice and human rights in Uganda, he travels extensively as a speaker, lecturer and writer. As a leading Christian figure, Bishop Niringiye is motivated by his faith and the role which he believes faith communities must play in the struggle for human rights.

More recently, he has aligned with the newly formed The Democratic Alliance (TDA), a coalition opposition party launched in July 2015. Elections in Uganda are often triggers for violence, and Bishop Niringiye is convinced that religious leaders have a crucial role to play in this situation. He is passionate about good governance and believes that the UN should do everything in its power to promote transparency and good governance.



Shirin Taherzadeh, a member of the Baha'i community, works to promote gender equality and the eradication of violence against women. Shirin has worked in South Africa and the UK, focusing on advocacy for victims of gender-based violence as well as educational programmes for young boys and girls on challenging gender norms, roles and expectations.

Ms Taherzadeh's approach to gender equality stems from the Baha'i belief that the equality of women and men is a fundamental aspect of human reality, not merely a goal to be achieved for the common good. Thus, in order for violence against women to be eradicated, a profound change must occur at the level of beliefs, attitudes and behaviours: a change grounded in the conviction that the equality of women and men is an undeniable truth of human nature.

In order for this change to occur, conditions must exist which enable men and women and girls and boys to question and challenge the underlying assumptions underpinning the existing social norms, structures and expectations which perpetuate gender inequality. As Ms Taherzadeh has witnessed in her work, as long as boys and men are not actively engaged in the process of promoting gender equality, not only are women held back from realising their full potential, but so too are men. As described in the Baha'i Writings, 'The world of humanity is possessed of two wings: the male and the female. So long as these two wings are not equivalent in strength, the bird will not fly...As long as women are prevented from attaining their highest possibilities, so long will men be unable to achieve the greatness which might be theirs.' In seeking to advance the equality of women and men, Ms Taherzadeh hopes that the UN will capitalise on the opportunities which enable women and men to reflect on and reconceptualise the roles, norms and behaviours governing family life, work, the community and international relations.

6. RECOMMENDATIONS

We encourage increased collaboration between various civic and religious groups and believe that 'such cooperation also demonstrates that a commitment to human rights can create and strengthen solidarity across all religious, cultural and philosophical divides.'²⁴

- We urge the international community to **pay consistent attention to religious leaders and human rights defenders from faith communities**, support the human rights and social justice work of religious communities, protect the right of religious leaders and members of faith communities to defend human rights, document and address immediately reprisals against them, and monitor their situation effectively. We urge the international community to uphold the values of the Declaration on Human Rights Defenders for all HRDs, and implement the various relevant regional guidelines and commitments to support HRDs.

²⁴ Report of the Special Rapporteur on freedom of religion or belief, 29 December 2014, A/HRC/28/66, Sect F. 3:74 p.18

- We would welcome a **wide inter-religious dialogue on the role of religious leaders as HRDs**, and consultation with religious leaders from different religious backgrounds. The regional freedom of religion or belief consultation involving over 70 HRDs including many religious leaders, held in Bangkok in Autumn 2015, provides an excellent example of such an initiative. The event was organised by the Asian Forum for Human Rights and Development (FORUM-ASIA), the International Commission of Jurists (ICJ), and Boat People SOS (BPSOS), and attended by the Special Rapporteur on freedom of religion or belief, Professor Heiner Bielefeldt.

- There is a clear need to develop a **more comprehensive understanding of the role of religious leaders and faith communities in promoting human rights**. Even though this initial briefing explores some key issues relating to the role of religious leaders and faith communities, significantly more in-depth research with comprehensive recommendations would help the international community to promote more effective participation of faith communities in national, regional and international human rights policy making, while identifying their specific needs. We also believe that more comprehensive research would provide information on the degree to which many religious leaders and faith communities working on social justice issues already interpret their work through a wider human rights framework.

- We would welcome a **more integrated and consistent inclusion of religious leaders and faith-based organisations promoting human rights in initiatives at all levels**: grassroots, local, national and international. Consistent participation of religious communities promoting human rights should be ensured during the development, implementation and monitoring of various human rights processes, including local human rights initiatives and national human rights action plans and policies, as well as international human rights processes such as the UN HRC, the Universal Periodic Review process and the General Assembly sessions.

- We believe that a **visible and coherent dialogue about the role of religious leaders as HRDs between several Special Procedures mandates** would make strategic, political and operational sense to religious leaders who are already promoting a wide range of human rights.

- We urge all stakeholders to **increase training and capacity building of religious leaders in order to better equip them to advance human rights**. There is also a need to raise awareness within faith communities of the Declaration on Human Rights Defenders, as well as other relevant human rights documents such as the EU Guidelines on Human Rights Defenders.