

## GOVERNMENT'S RESTRICTION ON SOCIAL MEDIA ACCESS AND ITS IMPLICATION TO HUMAN RIGHTS: COMPARATIVE STUDY BETWEEN INDONESIA, SWEDEN AND CHINA

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**Abstrak:** Saat ini, kita hidup di era teknologi modern yang berkembang pesat. Teknologi modern kini mampu mencakup hampir semua urusan negara, mulai dari kesehatan, transportasi, hingga keamanan nasional. Dalam makalah ini, kami akan fokus secara khusus pada keamanan nasional, karena ini adalah praktik umum bagi negara-negara saat ini. Dalam melakukan pemeliharaan keamanan nasional, pemerintah memanfaatkan beberapa fungsi teknologi modern, antara lain; penyensoran, penyaringan, dan pembatasan konten di media sosial. Dalam generasi di mana orang mencari kenyamanan dan aksesibilitas sebagai cara hidup, media sosial, salah satu sistem jaringan yang paling mudah diakses semakin dituntut dan dipopulerkan karena mendukung laju globalisasi yang bergerak cepat. Tulisan ini secara khusus akan mengkaji dan membahas isu pembatasan media sosial oleh pemerintah selama demonstrasi dan kaitannya dengan hak akses informasi di Indonesia, dibandingkan dengan Swedia dan China. Kedua negara tersebut dipilih karena Swedia dianggap sebagai pelopor hukum informasi, sedangkan China memiliki sejarah Panjang dalam pembatasan informasi.

**Kata Kunci:** teknologi modern, keamanan nasional, pembatasan konten, media sosial, dan hak asasi manusia.

**Abstract:** Today, we are living in an era of rapidly evolving modern technology. Modern technology is now able to cover almost all state affairs, from healthcare, transportation, and national security. In this paper, we will focus particularly on national security, as it is a common practice for states nowadays. In conducting the maintenance of national security, the government utilizes several functions of modern technology, for instance; censorship, filtering and restriction of content on social media. In a generation where people seek convenience and accessibility as a way of life, social media, one of the most accessible network systems is increasingly demanded and popularized as it supports the fast moving pace of globalization. This paper will specifically assess and discuss the issue of government restriction of social media during demonstration and its relation to the rights to access of information in Indonesia, in comparison to Sweden

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and China. The two countries were chosen because Sweden is perceived as the pioneer of information law while China have a long history of restricting information.

**Keywords:** modern technology, national security, restriction of content, social media, and human rights.

## A. INTRODUCTION

Technology has made it easier for the government to control the flow and access of information in order to preserve their interests. Today, the internet is a key part of this strategy.<sup>1</sup> To achieve this, the government has plenty of options, including censorship, filtering and restriction of content. They can achieve this by cutting access to certain websites or applications or even to the internet itself. As well as controlling the content of information that will be distributed and/or published in the media. This method is used by the government of Sri Lanka, who temporarily blocked access to several social media platforms following deadly explosions that killed around 207 people.<sup>2</sup> They believe this method will be able to prevent false information from spreading around the country. The Indonesian government has also applied a similar regulation to overcome their issues, which will be further elaborated in this essay.

Before discussing further on the regulations and case study, we need to understand the history behind the right of access to information. In 1766, Sweden became the first nation in the world to regulate regarding information law. Through this law, it established the right of access to information and press freedom in printing and distributing information relating to the government, parliament and the courts.<sup>3</sup> Moreover, the information law was applied to Sweden's constitution which highlights "*that free access should be allowed to all archives for the purpose of copying such documents in loco or obtaining certified copies of them*"<sup>4</sup>. This means access to all information must be available at all times and individuals who have authority can be held accountable. However, such right can be misused and lead to a serious legal issue. The right to access information and press freedom if abused may lead to offensive speech, violence and/or discrimination. It is possible the right might bring negative consequences towards the society and/or individual person. Hence, this is why the right

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<sup>1</sup> "Bending the Internet: How Governments Control the Flow of Information Online", *Starfor*, 2019, <https://worldview.stratfor.com/article/bending-internet-how-governments-control-flow-information-online>.

<sup>2</sup> Zack Whittaker, "Sri Lanka Blocks Social Media Sites After Deadly Explosions", *Techcrunch.Com*, 2021, <https://techcrunch.com/2019/04/21/sri-lanka-social-media-explosions/>.

<sup>3</sup> Juha Mustonen (ed.), *The World's First Freedom of Information Act* (Kokkola: Anders Chydenius Foundation, 2006).

<sup>4</sup> *Ibid.*

is not an absolute right and there are limitations. In truth, the Sweden's law mentioned above is in line with Indonesia's current information law development. Although to compare it directly, it is obvious Indonesia's development is behind. Regardless, Sweden's information law and its precautions can be a reference for Indonesian information law. It is later followed by France's Declaration of Human and Civic Rights in 1789 where it gives the public access to information as stated in Article 14 of the French Constitution. Although in reality of its execution it is only limited to public knowledge on where the tax money is allocated into, it became a stepping stone to the development of information law.

## **B. ANALYSIS**

In the 20<sup>th</sup> century, rights to obtain information became more crucial than ever, especially as nations around the world are healing from the catastrophe and destruction of the world war. During the cold war, various world leaders chose to censor a great amount of information from its citizens to achieve their political agenda. In some cases, such as during Stalin's regime, the censorship and restriction is rather excessive, turning everything into secrecy. This information restriction includes government policies, decisions, economies, food stock and other matters. The 1946 United Nations General Assembly generated a Resolution and Article 59 (1) stated:

*“Freedom of information is a fundamental right and is the touchstone of all the freedoms to which the United Nations is consecrated. Freedom of Information implies the right to gather, transmit, and publish news anywhere and everywhere without fetter. As such it is an essential factor in any serious effort to promote the peace and progress of the world”.*

The provision above became a universal standard on the rights to access information. It became revolutionary, as it became the first international regulation on freedom of information to the general public. In the following years to come, the rights to obtain information and the internet are rapidly developing in order to ensure the fundamental right every individual is entitled to.

In Indonesia, the right to obtain information is entitled to every citizen ever since its independence in 1945. Being a democratic nation, Indonesia has the obligation to recognize this right.<sup>5</sup> To that, the government should be under the obligation to ensure that this right is fulfilled. It is explicitly stated under the 1945 Constitution of Indonesia, article 28(f), as mentioned below:

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<sup>5</sup> Access To Information: A Fundamental Right, A Universal Standard. Ebook. (repr., Madrid, Spain: Access Info, 2006)., 5

*“Every person shall have the right to communicate and to obtain information for the purpose of the development of his/her self and social environment, and shall have the right to seek, obtain, possess, store, process and convey information by employing all available types of channels.”*

Based on this article, it can be concluded that the right to communicate and obtain information should not be limited as long as the purpose is for the betterment of themselves or their social environment. In order to get an in-depth understanding of the rights to access information and its relation to technology, the case study that will be discussed further in this journal is Indonesia along with several other nations as comparison.

Indonesian citizens and government had recently faced an impact on the use of social media. Social and messaging platforms were partially blocked in Indonesia as of Wednesday 22 May 2019 after authorities ordered a social media blackout amid an escalation of election protests<sup>6</sup>. This is related to the latest Presidential Election, which created controversy circulating many aspects of governmental affairs, especially in the field of technology. The most recent issue was regarding a decision made by the Ministry of Communication and Information to filter citizen's access to social media by restricting the transfer of photo, video, and voice content, particularly on Instagram and WhatsApp. Coordinating Political, Legal and Security Affairs Minister Wiranto said at a press conference that it was a necessary action to be taken to avoid incitement and false news from spreading to the wider public.<sup>7</sup> Moreover, Wiranto also believed such action was necessary as the spread of fake videos and photos may trigger “emotional response” of the general public. It was described as an urgent situation and decision to take in order to uphold national security making it a crucial decision to be taken.

In terms of its effectiveness, the precaution taken by the Indonesian government to restrict the use of social media was ineffective. It is due to the increasing development in technology and citizen's knowledge regarding how to cope with this issue has increased, they have found a way to neglect this restriction and find an alternative solution. The existence of a Virtual Private Network (VPN), that is a program that creates a safe and encrypted connection over a less secure network,

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<sup>6</sup> “Indonesia’s sophisticated internet filters are blocking Twitter photo and video uploads”, *NetBlocks*, 2019, <https://netblocks.org/reports/indonesias-sophisticated-internet-filters-are-blocking-twitter-photo-and-video-uploads-aAwq4EyM>.

<sup>7</sup> Rakhmad Hidayatulloh Permana, “Pembatasan Akses Medsos Disebut Lebay, Kemkominfo: Kami Berdasar UU”, *detikNews*, Mei 24, 2019. <https://news.detik.com/berita/d-4563950/pembatasan-akses-medsos-disebut-lebay-kemkominfo-kami-berdasar-uu>

such as the public internet<sup>8</sup>, enabled the server to pass through the firewall and access the internet and social media regularly without any limitation or restriction, thus it prevails over the existing restriction made by the government. Moreover, it is also ineffective due to the fact that it only restricts and filters a few numbers of impactful social media such as *Line* and *WhatsApp* which focuses on communication, leaving a great number of platforms unsupervised. Twitter, for instance, is one of the platforms that was not restricted during the Indonesian riot of May 22<sup>nd</sup>, while it should have been, considering that Indonesia is the 5<sup>th</sup> largest country in terms of Twitter users, with the percentage of 328 million users with 77% of them active.<sup>9</sup> If the purpose of this restriction was to limit the spread of false information, then it was not a highly successful method.

Furthermore, not only did the decision to restrict social media usage infringe the freedom of access to information of Indonesian citizens, it might limit the access of verified and authentic information produced by journalists to the public, thus, potentially harming their freedom of the press, as regulated under Act No. 40 of 1999 Article 4 of the 1945 Constitution regards Basic Provisions of the Press, which are:

- (1) *The freedom of the press is guaranteed as the basic human rights for every citizen.*
- (2) *Towards national press, no censorship, prohibition or restriction of broadcasting will be imposed upon.*
- (3) *To ensure the freedom of the press, the national press has the right to seek, acquire, and disseminate ideas and information.*

These articles clearly stated that the national press should not be prohibited from broadcasting its content and information, by restricting social media platforms, the government of Indonesia is indirectly limiting the scope of the broadcast and the flow of news from the media to the citizens. This violated both the freedom of the press and the freedom of citizens.

To add to that, it is regulated under Law Number 9 of 1998 on Freedom of Expressing Opinions in Public Article 1 (1), "*Freedom of expression is the right of every citizen to express his thoughts orally, in writing, and so on freely and responsibly in accordance with the law.*" The article above highlights the choices and freedom of every Indonesian citizen in sharing and expressing their thoughts. Pursuant to Article 18 (1), stated that "*Whoever with violence or threats of violence hinders the rights of*

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<sup>8</sup> *What is a VPN? – Definition from WhatIs.com.* SearchNetworking, 2019.

<sup>9</sup> Herman and Donny A. Mononimbar, "Indonesia Fifth-Largest Country in Terms of Twitter Users", *Jakarta Globe*, May 3, 2017, <https://jakartaglobe.id/news/indonesia-fifth-largest-country-in-terms-of-twitter-users/>.

*citizens to express opinions in public that has complied with the provisions of this law, shall be punished with imprisonment for a maximum of 1 (one) year*". This article ensures that citizens' rights in expressing their freedom should not be limited to whoever and anyone who limits that will be penalized. Through this law, it provides protection and a clear standing on Indonesia's standing in regards to freedom of speech that should not be limited as long as it is in accordance with the law.

By conducting social media restriction, the decision made by the Indonesian government raised some legal issues, such as the possibility of violating the regulations as mentioned above. The limited accessibility to social media inhibits citizens of Indonesia to share, update, and obtain information regarding the current situation of their country. Moreover, it also limits the capacity of the press to gather and distribute their information to the public. To prevent a repetition of such a case, there are things which the government and us as the citizens of Indonesia can start doing as a precaution for a change. First, media organizations must work hard hand in hand with the government and the citizens to produce and distribute only information that has a credible sources and is authentic, to tackle the spread of false information. Second, the media organization needs to extend its function from only reporting the news into verification of the news spreading around the social media,<sup>10</sup> meaning the media must be strict in deciding whether the news is worthy of publication or not. Third, the government of Indonesia can start by conducting a reevaluation of their decisions, especially when it comes to quick decision making for issues that come in a short notice so that the decision they made will not be ineffective misdirected which resulted in protests from the citizens. By incorporating the aforementioned methods, the Indonesian citizen and government as a whole may be one step further in eliminating false information and provide credible news.

It is very important for the citizens of Indonesia and the community as a whole to better understand the functions of technology and how to adapt to the changes in the modern society, so that there will be no misuse of technology that will create a harm to other people and the country, such as the use of social media to spread false information. It is also needed for us to be cautious of the credibility of the information we receive, as it may impact how we process that information. One of many ways to ensure information credibility is by cross checking on the information that is released along with reading for reliable sources. Indonesian citizens need to create a habit of using the internet and social media as a platform to spread positivity, accentuate truth as their

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<sup>10</sup> Ika Karlina Idris, "Pembatasan Akses Medson Salah Strategi, Demokrasi Indonesia yang Merugi", *Vice*, May 24, 2019, [https://www.vice.com/id\\_id/article/zmpyqw/pembatasan-akses-medsos-22-mei-salah-strategi-demokrasi-indonesia-yang-merugi-jokowi-prabowo](https://www.vice.com/id_id/article/zmpyqw/pembatasan-akses-medsos-22-mei-salah-strategi-demokrasi-indonesia-yang-merugi-jokowi-prabowo).

source of judgment along with raising awareness to their surroundings. Thus, it is important for Indonesian citizens to be wiser in adapting with the improvement of technology.

Presently, one of the legal instruments in Indonesia that is able to serve as a basis to protect and regulate the information technology is Law No. 11 of 2008 concerning Information and Electronic Transactions jo. Law No. 19 of 2016 concerning Amendments to Law No. 11 of 2008 concerning Information and Electronic Transactions. Electronic Information is defined as one or a set of electronic data, including but not limited to writing, sound, pictures, maps, designs, photographs, electronic data interchange (EDI), electronic mail (electronic mail/e-mail), telegram, telex, telecopy or the like, processed letters, signs, numbers, Access Codes, symbols, or perforations that have meaning or can be understood by people who are able to understand them<sup>11</sup>. Meanwhile, Electronic Transactions are legal actions carried out using computers, computer networks, and/or other electronic media. However, the implementation of this instrument is still inconsistent, as some of the provisions are open to multi-interpretation, resulting in legal uncertainty of the law in protecting the people. Therefore, it is still important to refer to international instruments, such as the UDHR, to better understand the rights that one has and the extent to which this right should be preserved.

Pursuant to Article 19 of Universal Declaration of Human Rights (“UDHR”), which are:

*“Everyone has the right to freedom of opinion and expression; this right includes freedom to hold opinions without interference and to seek, receive and impart information and ideas through any media regardless of frontiers”*

Freedom of opinion extends to the right to change an opinion whenever and for whatever reason a person so freely chooses.<sup>12</sup> The article above highlight the importance of individual rights in having access to media and information on public affairs<sup>13</sup> along with the right of the general public to receive media output.<sup>14</sup> It ensures every individual to have access and knowledge relating to matters revolving around their life. To that, all forms of opinions are protected including opinions of a political,

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<sup>11</sup> "UU ITE: Pasal-Pasal Dan Mereka Yang Terjerat", DSLA (Daud Silalahi & Lawencon Associates), 2021, <https://www.dslalawfirm.com/uu-ite/>.

<sup>12</sup> General Comment No. 34, Article 19: Freedom Of Opinions And Expression, ebook (repr., United Nations International Covenant of Civil and Political Rights, 2021), 2, <https://www2.ohchr.org/english/bodies/hrc/docs/gc34.pdf>.

<sup>13</sup> Gauthier v. Canada, 1999 CCPR/C/65/D/633/1995. CCPR.

<sup>14</sup> Maylonoy and Sa'di v. Uzbekistan, 2009 CCPR/C/95/D/1334/2004. CCPR.

scientific, historic, moral or religious nature.<sup>15</sup> Thus, these rights implicate freedom of press and the ability to comment and/or inform on ongoing public issues without restraint or censorship.

Unfortunately, social media restriction is a common practice done by the government during demonstrations or protests in various countries around the world. The reasoning behind such restriction is to prevent an overflow of information and to control the circulating news. Supposedly, by restricting and keeping the citizen in the dark it provides more control to the government in order to achieve their political agenda and/or to control the citizen as it left them in the dark. The main goal is to prevent information from having politically synchronizing effects by minimizing access to information.<sup>16</sup> In 2020, the internet in Belarus was shut down for more than 2 days post an election which resulted in a protest. Also, internet access in Ethiopia was restricted for 3 weeks during a civil disorder. The most common social media to be restricted in such incidents are Facebook, WhatsApp, Instagram, and Telegram. The latest incident of social media restriction happened on July 11, 2021, as the Cuban government decided to conduct social media restriction due to the ongoing protest on economic crisis as well as government actions in handling Covid-19.

Additionally, it is well known that China conducts censorship to information circulating within the country. Yet, there are still platforms available for Chinese citizens to use. However, China has taken a further extreme measure by shutting down social media and/or the internet during the period of controversy. For instance, during the June 4 anniversary of the Tiananmen Square massacre and Hong Kong's Umbrella Movement protest in fall of 2014, the Chinese government has blocked platforms such as Wikipedia, Facebook, Twitter, YouTube, and Google.<sup>17</sup> The purpose of such restriction and control is to keep a tight reins on traditional and new media to avoid potential subversion of its authority.<sup>18</sup> Due to the restriction, between 1% and 8% of internet users in China use proxy servers and VPN to access censored content by the government both political and non-political.<sup>19</sup> Although by 2011, the government occasionally attempted to restrict VPN users. As the result, many of the VPS users

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<sup>15</sup> General Comment No. 34, Article 19: Freedom Of Opinions And Expression, ebook (repr., United Nations International Covenant of Civil and Political Rights, 2021), 2.

<sup>16</sup> Clay Shirky, "The Political Power of Social Media: Technology, The Public Sphere, and Political Change", *Foreign Affairs* 90, No. 1 (2011): 39.

<sup>17</sup> "Media Censorship In China", Council On Foreign Relations, 2021, <https://www.cfr.org/backgrounders/media-censorship-china>.

<sup>18</sup> *Ibid.*

<sup>19</sup> *China, Internet Freedom, And U.S Policy*, ebook (repr., Congressional Research Service, 2012), 1, <https://fas.org/sgp/crs/row/R42601.pdf>.



experience interference with their access to blocked sites.<sup>20</sup> In the case of China, not only does it violate the right of access to information it also violates the right to implement freedom of speech.

If China's policy on censorship to information were to be applied in Indonesia including the social media blockage, it will lead to negative response and/or legal problems from the Indonesian citizens such as demonstrations. As such action violates Act No. 40 of on Basic Provisions of the Press and Law Number 9 of 1998 on Freedom of Expressing Opinions in Public along with other laws.

It is important to take into account that restricting social media and/or the internet does not solve the actual ongoing issue. On the contrary, such actions worsen the situation and further destroy the relationship between the government and its citizens. The most common reasoning the government provides to the general public in applying restrictions is to prevent false information from spreading around in order to ensure national security during demonstrations. Alas, the citizen perceives such action to be a violation to their human rights as it limits communication and information sharing. It is an opposite to what is stated and regulated under Indonesian law, where citizens have every right and should be able to express their opinions on social media freely and should have been protected in doing so as it is our constitutional rights.

In an attempt to understand the topic in depth, it is important to introduce the concept of convergence legal theory. Convergence legal theory is used in purpose to unite legal systems, concepts, principles, norms universally<sup>21</sup>. Many lawyers and economists have predicted that the legal order will move in an adequate direction. In their views, the implications of globalization will force the legal order to converge so as to achieve economic efficiency<sup>22</sup>. Legal unification is seen as desirable, and also inevitable in the current legal order. For us to recognize that the legal order is essentially similar, will make it easy to formally unify the law in the future. In relation to the case at hand, there exists a practice which could be applied universally by many countries. There are several countries who tend to keep their oversight and regulatory body who is responsible for internet content access, separated from other regulatory areas. They use this approach to maintain control over content under a

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<sup>20</sup> Charles Arthur, "China Cracks Down On VPN Use", The Guardian, 2021, <https://www.theguardian.com/technology/2011/may/13/china-cracks-down-on-vpn-use>.

<sup>21</sup> Danrivanto Budhijanto, "Pembentukan Hukum yang Antisipatif Terhadap Perkembangan Zaman Dalam Dimensi Konvergensi Teknologi Informasi dan Komunikasi". *Jurnal Ilmu Hukum* 14, No. 2 (September, 2011): 225-255.

<sup>22</sup> *Ibid.*

separate government ministry. There is a downside of this, however, when we look at the operational costs, it can be way more significant compared to having only one regulatory body. This is something that will be hard for small countries to apply, as the market size and the capability to provide adequate regulators is lacking.

### **C. CONCLUSION**

In reference to the history and case discussed above, therefore, it can be concluded that citizens have the right to have access to sources of information and for the press to be free to provide such information without being concerned as it is one of the most fundamental rights of human beings that should not be violated. The government should not in any way restrict us from receiving credible news and limit our freedom of using social media, as our rights are already protected and regulated under the 1945 Constitution as well as in the Universal Declaration of Human Rights. It is crucial to be aware that the rights we possess to use technology, particularly social media, needs to be balanced by our decency as a human being to spread only the news that is credible and trusted, so that this kind of issue will not repeat itself in the future. Should the government want to prevent the spread of false information circulating around during demonstrations or not, it should be done in another way without conducting social media blockage or restriction. As by doing social media restriction only on several communication platforms such as Line and WhatsApp it does not solve the situation as information can be exchanged on other platforms. All in all, social media restriction does not solve or minimize the current issue encountered by the government. If the government truly wishes to eradicate false information during demonstration, there are other ways to handle it rather than violating the rights of Indonesian citizens.

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