Iran Covid-19 Report

The Covid App Project

The Covid App project is a civil society initiative that stemmed from a research interest in Covid-specific interventions – especially contact tracing apps – in countries outside Europe and North America. This shared research focus drew together six civil society organisations: ALT Advisory (South Africa), Internet Democracy Project (India), InternetLAB (Brazil), Karisma (Colombia), SMEX (Lebanon), and United for Iran. AWO, a data rights agency, provided coordination support.

Over a 7-month period, the group reviewed contact tracing apps and assessed their interaction with public health, human rights, privacy, and data protection in the six countries of focus. We conducted interviews, filed freedom of information requests, and extensively reviewed public documentation to produce in-depth country reports. Contact tracing apps cannot be evaluated in a vacuum: the research considers alternative measures, technological and others, that were deployed in response to the pandemic, and often interacted with the design and deployment of contact tracing apps themselves.

Today, we publish the in-depth country reports – each accompanied by a set of recommendations – alongside an expert technical review of seven contact tracing apps from our countries of focus.

We hope our contribution will support the critical evaluation of contact tracing apps and other pandemic measures. In addition, we hope to foster a discussion of safeguards – including recourse and oversight – that will better protect marginalised and vulnerable groups during public health crises, bolster human rights, democracy, and rule of law, and strengthen future pandemic response.

Introduction and Country Context

After China, the Islamic Republic of Iran was one of the first countries to suffer from a major outbreak of Covid-19, and since then has continued to struggle to get the spread of the disease under control. At the time this report was written, official statistics had counted over 1.4 million cases and 58 thousand deaths.[1] However, as we will explore, there is ample reason to be skeptical of these official accounts and to believe that the toll is likely much higher.

This report provides some context on the government structure of Iran and the effect this structure has had on the nation's Covid-19 response. We highlight some of the measures, both technological and non-technological, which the government took to combat the virus, and explore their effectiveness. We have separated our analysis into three pillars: we analyze the government's response from a public health perspective, and outline the ways the response has suffered from "function creeps", which endanger a number of groups. Specifically, we outline threats to the nation's political prisoners, journalists, and refugee and migrant populations, and we conclude with a handful of recommendations that could improve the nation's response to the ongoing Covid-19 pandemic.

Covid-19 Response: The Impact of Iran's Government Structure

As part of our research, we aimed to develop a clear understanding of the ways Iran's unique form of government have impacted both initial and subsequent responses to the pandemic. Iran is commonly, and rightfully, referred to as having a deeply ideological, theocratic form of government, with primary decision-making power in the hands of Supreme Leader Ayatollah Ali Khamenei. However, what is less appreciated are the nuances of this government structure, which can more accurately be described as a hybrid of conservative ideological and technocratic government systems. Generally speaking, the conservative and theocratic forces control some branches of the government such as security, the military, and the judiciary, whereas the technocratic elements work in the administrative and ministerial branches.

The conflicts between these two forces, especially early in the pandemic, led to a haphazard response. For instance, the technocrats sought very early on to place the city of Qom under quarantine. Qom – which is both a powerful religious center in Shia Islam as well as the site of the first Covid-19 infections in Iran – became an early point of division in early 2020, as

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[1] These statistics were measured using the Worldometer COVID-19 dashboard for Iran, available here: https://www.worldometers.info/coronavirus/country/iran/.

technocratic forces sought to close holy shrines to the public, cancel Friday prayers, and implement other measures. However, the conservative, ideologically-driven elements of the government felt such measures were unnecessary and even counterproductive to its goals, and resisted calls for such measures.

To elaborate, we interviewed, on condition of anonymity, a former member of Iran's Majlis, the legislative branch of Iran's hybrid government structure. The former Parliamentarian described the government's response as follows:

> "Because of the complexity and the special form of political rule in Iran, i.e., the lack of a unified form of rule and existence of multiple power centers and decision-making authorities, the anti-Covid management in the first phase of the pandemic was expectedly chaotic. And since the outbreak in Iran coincided with parliamentary elections, Iranian authorities initially tried to ignore it, hoping that it would go away by itself, or that its consequences for public health would be limited and could be brought under control easily after the election. Because of this, the Iranian authorities did not provide information on the virus and the situation to the public. In the early phases of the pandemic, they failed to take some important steps – like canceling flights from China or putting Qom under quarantine, where the first major outbreak in Iran happened. They instead carried on with holding the election, and held one of the most undemocratic and engineered elections in the history of the IRI."[2,]

As Covid-19 continued to spread and public and international pressure mounted, the religious and political elites gradually recognized the need for greater interventions. Supreme Leader Ali Khamenei gave his approval for the creation of the National Headquarters to Fight Coronavirus (NHFC), and sanctioned it as the highest authority for developing, adopting, and enforcing policies. The NHFC is a hybrid of both conservative/ideological forces and technocratic elements, and includes experts from various government ministries, representatives of the security and military forces, and a representative from Iran's Guardian Council – the 12-member body that interprets the nation's constitution, approves candidates for elections and supervises their results, and exercises veto power over laws passed by parliament. At the time of this report, the NHFC appears to have unquestionable authority over Covid-19 policies, and its decisions are binding for all governmental and non-governmental institutions and organizations.

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[2] IRI - Islamic Republic of Iran. Interview with a former member of Iran's Majlis. The content of these interviews has been translated and lightly edited for clarity.

Mainly due to the competing interests between the conservative/ideological and technocratic branches, a sort of cat-and-mouse game of disinformation has played out, seeking bolster the government's standing while permitting brief moments of transparency directed at controlling the virus's spread. In our interview, the former Parliamentarian described this conflict as a sort of "securitization" of the pandemic. In this definition, authorities turn a matter of social and public interest into a matter of national security. That is, the conservative/ideological forces, already reeling from the longstanding effects of sanctions, the November 2019 economic protests, escalating tensions with the United States, and other challenges, believed it was in its best security interests to downplay the effects of the pandemic as much as possible and give the appearance that the disease was under control. As part of this effort, the national statistics concerning the spread of Covid-19 were, to a large extent, engineered in order to bolster confidence in the government.[3]

The former Parliamentarian described how these misinformation efforts damaged the nation's response, and weakened public confidence in official communications regarding the disease:

> "These distorted statistics led to a distorted perception of reality, and thus led to not taking more proper measures. One example that depicts the mess created concerning statistics was the contradictory statistics published by the Islamic City Council of Tehran (which received its information from Behesht-e Zahra cemetery, which published higher numbers) on the one hand, and by the NHFC on the other hand. The difference between the two statistics was so significant that it caused widespread critique, and resulted in the government making a moderate modification of its statistics (upwards), and also taking some actions to disempower municipalities and the city councils from announcing statistics. They also banned all local health authorities and offices in provinces from declaring their region-specific statistics, so that the government could better manage the crisis unilaterally. This, however, resulted in the population trusting official statistics even less."[4]

A variety of sources have corroborated these claims.[5] This haphazard approach initiated a battle back-and-forth between the national government, which wanted numbers to appear low, and local hospitals, municipalities, and city councils, which published their own independent statistics. The former Parliamentarian noted that leaks would happen at the local level anyway,

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[3] "Coronavirus: Iran cover-up of deaths revealed by data leak." *BBC News*. August 3, 2020. https://www.bbc.com/news/world-middle-east-53598965

[4] Interview with a former member of Iran's Majlis.

[5] Wyatt, T. "Coronavirus: Data leak reveals true death toll in Iran three times official figures, says report." *The Independent.* August 3, 2020. https://www.independent.co.uk/news/world/asia/coronavirus-iran-death-toll-covid-19-bbc-persian-a9650836.html. Behravesh, M. "The Untold Story of How Iran Botched the Coronavirus Pandemic." *Foreign Policy.* March 24, 2020. https://foreignpolicy.com/2020/03/24/how-iran-botched-coronavirus-pandemic-response/

and that "as the number of casualties increased, and information contradicting official statistics was circulated on social media, public pressure would grow,"[6] then officials would alter the statistics somewhat, and often implement more restrictive measures to stem the disease.

A consequence of this dynamic has been an incredibly difficult environment in which to conduct the research for this project. While our team conducted significant desk research, held interviews with many individuals with on-the-ground knowledge who are all anonymous here, as well as experts from the Iranian diaspora, we found it increasingly difficult to independently verify exact numbers or information.

Covid-19 Response: The Impact of Sanctions

Another powerful factor limiting the government's response to the pandemic came from the ongoing sanctions on Iran's economy and access to resources. While medical supplies are technically exempt from sanctions, the cost of the sanctions has nonetheless been to drastically reduce Iran's manufacturing and trade capacity, limiting the country's ability to adequately import needed supplies needed.[7] Rather than ease up, the US doubled down on its sanctions regime as outbreaks began, when it is likely that easing up could have saved many Iranian lives.[8] The Trump administration also made efforts to block Iran's attempts to fund anti-Covid efforts through other avenues, including blocking a USD5 billion request to the International Monetary Fund.[9]

In our interview with the former Parliamentarian, we learned some of the specific ways sanctions have hampered the government's response. For example, the Iranian Cabinet reportedly requested to withdraw approximately USD1 billion from Iran's National Sovereign Wealth Fund in order to help finance anti-Covid measures, as the government was simply unable to take meaningful steps without this funding. The former Parliamentarian stated that this request was met by the Supreme Leader with "discontent and hesitation".[10] Khamenei apparently granted the request 11 days after it was made, but months later the Ministry of Health and Medical Education continues to complain that they have been unable to access any part of the billion-dollar fund.

The former Parliamentarian pointed out other ways in which sanctions and Iran's overall poor economic situation have contributed to the lackluster Covid-19 response. The interviewee stated: "the main reason why they [the Iranian government] have not taken far-reaching restrictive

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[6] Interview with a former member of Iran's Majlis.
[7] Murphy, A. et al. "Economic Sanctions and Iran's Capacity to Respond to COVID-19." *The Lancet*. April 6, 2020. https://www.thelancet.com/journals/lanpub/article/PIIS2468-2667(20)30083-9/fulltext
[8] Salehi-Isfahani, D. "Iran: The Double Jeopardy of Sanctions and COVID-19." *Brookings*. September 23, 2020. https://www.brookings.edu/opinions/iran-the-double-jeopardy-of-sanctions-and-covid-19/
[9] Talley, I. and Faucon, B. "U.S. to Block Iran's Request to IMF for $5 Billion Loan to Fight Coronavirus." *The Wall Street Journal*. April 7, 2020.
https://www.wsj.com/articles/u-s-to-block-irans-request-to-imf-for-5-billion-loan-to-fight-coronavirus-11586301732
[10] Interview with a former member of Iran's Majlis.

measures such as curfews is that the government simply does not have the resources. Implementing such lockdowns and curfews necessitates providing large numbers of people with material support, so those people, especially the economically vulnerable, can survive."[11] S/he noted that the government had, up until then, done very little to alleviate the economic effects of the pandemic, noting that the financial help that was given to families was woefully inadequate – an estimated USD50 to 100 for some of the poorest –[12] compared to what other countries had given their citizens.

Pillar 1: Scientific Assessment of Anti-Covid Measures Taken by Iran's Government from a Public Health Perspective

The Government's Actions So Far: Alternative Means – Public Health Measures

A summary of the public health measures implemented by the Iranian government to slow the spread of the virus is below:

Tracing interviews: Based on our interviews and desk research, the Iranian government has not implemented any robust contact tracing regime. While officials in some healthcare facilities will ask patients questions about their health and that of their immediate family member, it seems that there is no systematic tracing of contacts beyond the immediate family of the patient and their household contacts. Tracing interviews appear to happen in two ways. First, those who have symptoms register themselves online (e.g., at www.salamat.gov.ir) or via contact hotlines (e.g., 4030), are interviewed (by telephone) by public health workers and receive instructions (to go to testing stations/doctor, or to stay at home and isolate themselves). Second, nationwide screening campaigns have public health workers contact households and interview them about their health.

Self-isolation or personal quarantine: Those diagnosed with Covid-19 are asked or advised to isolate themselves for two weeks at home (unless they require hospitalization). It seems that there is no legal monitoring and penalty process in place to systematically enforce personal quarantining. There have been some appeals and threats made by officials to make the quarantine compulsory and to use law enforcement agencies to impose it; however, this does not seem to be a feasible option, since many would face loss of income and/or hunger if unable to go out to work.

Testing campaigns: Nationwide or city-wide testing campaigns contacted and interviewed households by telephone, but without providing any personal contact with medical personnel. By November 2020, no additional reports had been published about these testing campaigns. There

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[11] Ibid.
[12] These payments were reportedly only made to the 3 million poorest Iranians – a helpful move that nonetheless leaves many families vulnerable and unable to self-quarantine. See "Tracking Economic Relief Plans Around the World during the Coronavirus." *Tax Foundation*.
https://taxfoundation.org/coronavirus-country-by-country-responses/#Iran. May 6, 2020.

are also testing stations, where people can voluntarily go and be seen in person. However, these do not include laboratory testing – but rather provide just a basic, preliminary diagnostic, including a temperature check.

Laboratory testing: Testing rates were low at the beginning of the pandemic. Since then, capacity has increased to about 30 thousand lab tests per day (although, in comparison to industrial nations, this is relatively low). Reports have circulated suggesting that the government would attempt to increase this to as many as 100 thousand tests per day, but this seems unlikely, in large part due to an additional round of sanctions, which has made access to tests even more difficult. Because of the relatively young age composition of the Iranian population, an overwhelming majority of infections proceed either asymptomatically or with mild symptoms. Only those with severe symptoms are likely to go through lab testing. Although the Ministry of Health and Medical Education (MHME) declared the lab tests free of charge, many hospitals demand some amount of financial compensation, which means that many people on lower incomes will probably opt not to be tested.

Use of personal protective equipment (PPE): Following initial hesitation and resistance by leaders and citizens alike, wearing masks became compulsory in closed public spaces as well as at gatherings where social distancing was not possible. It appears that an overwhelming majority of citizens abide by these new regulations. At the beginning of the pandemic, supplies were an issue; however, since then, the supply has increased and stabilized, seemingly meeting national demand.

The Government's Actions So Far: Alternative Means – Administrative Measures

The government also took additional measures some of which were useful, although many disproportionately impacted vulnerable groups. A summary of these actions follows.

Limitations on movement: In spite of the rapid spread of Covid-19, a curfew or a total quarantine of whole cities or neighborhoods was never put in place. Individuals were always permitted to leave their houses for any reason. Perhaps one of the most important measures by Iranian authorities has been the imposition of restrictions on intercity travel (a semi-quarantine of cities). Security and paramilitary forces were ordered to check cars coming into the cities. The travelers were then turned back if they were not from the local population (those who had traveled because of their job/business were, however, allowed entry). In some regions, non-urban public spaces such as parks, national parks, beaches, and other locations were also closed. Security, military, and paramilitary forces were in charge of enforcing these restrictions.

Strengthening border control: Since Iran was one of the first countries to have serious outbreaks of Covid-19, its neighboring countries unilaterally closed their borders first, to both goods and passengers. Subsequently, screening and hygiene measures were implemented at the border

crossings, the transport of goods became possible again, and business returned to normal. The same was not true for refugees and migrants, however, and new and stricter border policies have had deleterious effects on Afghan nationals crossing into Iran. From the perspective of the rule of law, the Iranian-Afghan border is extremely problematic. Due to a lack of state control on the Afghan side, there is a high flow of illegal immigration into Iran as well as reports of violence and ill-treatment of migrants committed by Iranian security forces. This is further discussed in Pillar 3.

<u>Limitations on business and cultural and educational facilities</u>: In some phases of the pandemic, the government ordered many businesses and facilities to close, namely, any businesses and facilities which not seen as essential. This included mosques, schools, universities, libraries, concert venues, cinemas, amusement parks, sports complexes, cafes and restaurants, hair salons, retail markets, stores that sell non-essential items, and other venues.

<u>Limitations on assembly</u>: Another administrative measure was to prohibit large gatherings, including those in stadiums, large events, or protests, as well as weddings and funeral ceremonies, in most circumstances. In some local cases, however, there was no general ban, but just a limit on the number of participants. National-level regulations issued by the NHFC were understood by regional governments as guidelines and not as binding laws. The concrete interpretation and implementation of these guidelines differed across regions and private gatherings were not officially forbidden. In the absence of clear and officially sanctioned regulations about holding private gatherings, local governments make the decisions, which differ from place to place and according to the local infection rate. It seems that the state has difficulty enforcing such rules, especially in rural areas and in provinces, where for most people, it is much more important to maintain familial relations than obey such guidelines. In addition, there have been reports saying that citizens have been arrested for not abiding by the often vague regulations regarding private gatherings.

Protests held during this period, despite being a rare occurrence, were met with the same harsh crackdown by security forces as they were before the Covid-19 pandemic. However, there are some indications that because of the rapidly deteriorating economic situation, the security and intelligence agencies have become more intolerant when dealing with street protests, but this has been difficult to validate empirically.

Another point of concern is the possible mobilization of paramilitary forces (Basij) to monitor and break up private gatherings. Our research could not find significant evidence to confirm this. It seems that the Islamic Revolutionary Guards Corps (IRGC) and its associated paramilitary forces have restrained themselves and do not systematically interfere. In their propaganda they emphasize their logistical support for government efforts to fight the virus. It appears that they prefer to delegate the execution of unpopular policies to government agencies: however, this could change if nationwide protests against the government break out again. Many of our

interviewees, including the former Parliamentarian, expressed fear that security forces could be given more authority to monitor, spy, and carry out physical crackdowns under the pretext of enforcing health regulations.

<u>Limitations on freedom of opinion and expression</u>: Iran has a poor record of respecting and safeguarding the right to freedom of opinion and expression. This is reflected in reports of crackdowns on and arrests of online activists and whistleblowers related to the Covid-19 crisis. These arrests or prosecutions have happened under the pretext of cracking down on false news, but it seems that the state has also used arrest and intimidation campaigns to enforce its official narrative on how it is handling the virus.

Our assessment of the Iranian government's anti-Covid measures has identified a few key areas, which were gravely lacking. These are drawn from interviews with experts in key areas, including an anonymous Iranian Public Health Official who provided key insights explored below.

Lack of a Unified Government Response

One of the core issues that stood out, and which was corroborated by multiple interview sources, was the lack of a truly unified government response. As discussed by the former Parliamentarian above, one key goal of the Iranian government was its apparent "securitization" of the crisis – and its aim to appear to have the situation under control at any cost – exacerbated by the many political crises beleaguering the country during the previous year. Many of our interviewees expressed the belief that the government prioritized showing strength over taking any truly meaningful action to stop the spread of the virus.

The Public Health Official we interviewed described the communication crisis:

> "In other countries, such as the USA, UK, Germany, or many Southeast Asian countries, government officials clearly communicated to the public the seriousness of the situation as well as to public health instructions. But in Iran, as we go up the ladder of management and hierarchy in government institutions, the higher-ups tend to make statements which are more relaxed about the situation in an effort to avoid public alarm. At the same time, when we go down the ladder of management, the local managers in the field tend to be more radical when expressing warnings to the public. So, there is a kind of discrepancy between the language or tone used by officials at the top of the ladder, and that of the officials working and experiencing the situation on the ground (including doctors). This had a negative effect on the management of the pandemic."[13]

This communication discrepancy between the national leadership and street-level bureaucrats and doctors drastically weakened the Iranian government's response. The Public Health Official further emphasized the inconsistency in government messaging by stating that it "led to the

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[13] Interview with Iranian Public Health Official.

situation that even the President himself did not wear a mask until the Supreme Leader reminded government officials to do so when they expect ordinary citizens to wear masks."

Lack of Contact Tracing Efforts

Another clear shortcoming from a public health perspective has been the failure to implement a rigorous contact tracing regime. While there has been a handful of efforts, they have been haphazardly implemented without any clear coordination at a national or even regional level. Moreover, efforts to attempt contact tracing using mobile apps – initially with the AC19 app and later with the Mask app, described in detail below – were likely doomed to failure from the start as the government made very little effort to communicate privacy practices concerning user data.

When asked about contact tracing, the Public Health Official described the government's efforts as follows:

> "The strategy or the method of contact tracing (to break the infection chains) has not been implemented by Iranian authorities. Those who were registered as infected, for example in hospitals, were asked some questions about their contacts in the past few days. But the information gathered from questionnaires was not used afterward to trace the infection chains and break them, in the way it was done, for example, in Cuba through human resources and not technological means. These questionnaires and answers were archived without being used in Iran."

Inability to Meaningfully Enforce Quarantine Efforts

Another limitation has been the government's limited success implementing or meaningfully enforcing quarantine efforts. While some attempts took place, which have had some degree of success, our analysis has found a number of areas that could have been improved.

One shortcoming of the government's attempts to meaningfully enforce quarantine efforts has to do with a lack of resources. Implementing a successful lockdown or quarantine requires covering citizens' basic needs so they can social distance for long periods. However, as our interview with the former Parliamentarian revealed, this simply was not an option:

> "The main reason they have not taken far-reaching restrictive measures such as curfews is that the government simply does not have the resources to do it. Implementing such lockdowns and curfews requires providing a large number of people with material support so that these people, especially the economically vulnerable, can survive. That is why the government has been very reluctant to impose lockdowns. The government did very little to alleviate the effects of the partial lockdowns it ordered, for example, by distributing foodstuffs among the poor or providing financial help (in the form of loans)

to citizens as compensation for lockdowns. This help was, however, ridiculously low compared to other countries (maybe USD50 to 100)."[14]

The former Parliamentarian further mentioned that the Iranian government, at times, even flirted with the idea of simply trying to achieve herd immunity as a strategy, but ultimately backed off after negative reactions from the public.[15] In any case, the government's financial struggles, exacerbated by international sanctions, made any implementation of large-scale lockdowns extremely difficult.

The Public Health Official also pointed out that many people are not abiding by the handful of limitations that are in place, emphasizing that "the reason why people are not following the instructions is that one, people have to continue to go to work and there is no financial support during lockdowns, and two, public sensitivity to the issue has dropped in recent months, and people are getting used to the situation."[16]

Low Availability of Testing – Especially for the Poor

Like much of the world, Iran had an exceptionally low testing capacity at the beginning of the pandemic. Since then, capacity has increased substantially which, while an improvement, remains relatively low for a population of almost 84 million.[17] Generally speaking, only individuals with severe symptoms are likely to be admitted for lab testing.

Opinion on the Effectiveness of the App

Finally, we discussed the effectiveness of the Mask app with the Public Health Official, who stated that despite its limitations, the app had actually been a fairly useful tool in the nation's fight against Covid-19. The official noted that, while the government had failed to implement a useful contact tracing regime either through administrative or technological measures, the Mask app is nonetheless "useful for the government, with its high logistic abilities and its authority to write and enforce laws. For example, the risk area maps the application produces could be used to assess the occurrence of infections in certain cities or districts, and to develop and enforce tailor-made policies such as lockdowns or quarantines."[18]

The Public Health Official reiterated many of the shortcomings noted above, particularly concerning the Iranian government's poor human rights record and history of public surveillance. The official stated:

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[14] Interview with a former member of Iran's Majlis.
[15] Ibid.
[16] Interview with Iranian Public Health Official.
[17] "The cost of the corona test was announced." *Eghtesaad24.ir* (Farsi) هزینه تست کرونا اعلام شد
[18] Interview with Iranian Public Health Official.

"I do not know how many users the application has, but I can say that there were two factors which could have impeded the mass usage of the app. First, such contact tracing apps work with technologies such as GPS, and are not therefore always welcomed by the population, because people are reluctant to give the state access to their private information such as social contacts and movements – and this could be even more of a concern in totalitarian states. Second, there were many difficulties bringing government officials in line to use the application and incorporate it into their strategy to fight the pandemic. There were many efforts by the app developers to influence the government officials which were in vain. The government has not used the app so far for contact tracing purposes."

Pillar 2: Function Creep of Alternative Means and Impacts on Social Control

The Government's Actions So Far: Technological Interventions

As the challenges of the pandemic eventually became undeniable, Iranian authorities, like those in other nations, started to develop an application to gather information on infection cases (and, possibly, to help with contact tracing efforts). Two widely used applications were used: one developed by the Ministry of Information and Communications Technology (called "AC19") and another by an (apparently independent, volunteer) team of researchers from a consortium of technical universities (called "Mask"). To evaluate each of these, we performed desk research on the websites used to advertise the apps, explored the apps themselves, and conducted an interview with a mobile technology expert.

An important distinction must be made between the two apps discussed below. The AC19 app is the only app, which was *directly* sanctioned and developed by the Iranian government. After the failure of the AC19 app, the Mask app was developed independently and was ultimately endorsed by the government. This is an important nuance to remember when reading the descriptions and analysis below.

AC19 App

The AC19 app was developed by the Ministry of Information and Communications Technology (MICT) with the implicit consent of the Ministry of Health and Medical Education (MHME).[19] Its primary aim was to be a user-friendly self-diagnosis tool, and it was shared nationwide by SMS through communication channels controlled by the MICT. Ultimately, the app garnered between 3 and 4 million users.

However, the AC19 app quickly attracted a great deal of controversy among IT experts, who had real concerns about its collection of users' sensitive data– including the users' geolocation in real

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[19] There are some conflicting statements and reports on whether this app was approved by the MHME or not.

time. This controversy was exacerbated by the lack of transparency when users agreed to install the app as the app was described merely as a self-diagnosis tool – not as a contact tracing app, which would require data like a user's real-time location. In addition, the option to disable or opt out of the geolocation feature was not clearly communicated or, in the case of older Android devices, not communicated at all. Many users were simply not aware that their locations were being tracked in real time, something later confirmed by Iranian officials.[20]

The app was developed on behalf of MICT by Sarzamin Housmand, a company notorious for its previous involvement in surveillance programs initiated by the government and its intelligence services. Shortly after the relationship was revealed, Google decided to remove the app from its Play Store – and no explicit reason was ever given.[21] Officials from MICT argued that the app abides by the data and privacy protection standards set by the World Health Organization, but the connections with Sarzamin Housmand make these claims doubtful. In spite of its removal from the Google Play Store, the app remains available on other app stores in the country as well as on government-run platforms.[22] Currently, the app acknowledges that it is used for contact tracing – not just for self-diagnosis.

One crisis that arose related to the AC19 app was a debate within the government about the best way to approach these data and privacy concerns. The MHME took an official position forbidding any app or app developer working with them from gathering users' personal data or monitoring their geolocation.[23] The MHME stated that it would certify apps that met these standards and post them on their website, www.salamat.gov.ir. However, to date there are no certified applications listed – including AC19. It appears that the NHFC has not yet developed a unified approach to implementing contact tracing apps and managing data and privacy concerns, which has exacerbated an already wide trust gap between the ministry, the people, and the apps.

Likely due to these concerns, in the past few months there has been little discussion surrounding AC19 in the Iranian media, nor any significant discussion online. Based on this, our researchers surmise that ordinary citizens seem to have lost their trust in the application. In addition, government officials have stopped advertising the app – until a few months ago, officials had used a variety of methods to generate app buy-in, including sending SMS messages to millions of Iranian phones, through interviews with state media, and other endorsements. None of these methods has been active during the final half of 2020.

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[20] "Release of new AC19 infection in Iran by a young interrogator." *Irantrue* (Farsi) انتشار آلودگی جدید AC19 در ایران توسط بازجوی جوان; "Ministry of Health app for coronavirus apparently collects user information beyond its need." *Zoomit* (Farsi) https://www.zoomit.ir/2020/3/12/346340/iranian-coronavirus-app-collecting-sensitive-information/
[21] Song, V. "Google Pulls Iran's Official Coronavirus App From Play Store." *Gizmodo*. March 10, 2020. https://gizmodo.com/google-pulls-irans-official-coronavirus-app-from-play-s-1842235444
[22] The official website for AC19 is https://ac19.ir/
[23] "Corona screening applications should not take away personal information." *Peivast* (Farsi) https://peivast.com/p/72597

As a result, there have been some efforts by semi-governmental or private actors to develop contact tracing apps. The most successful example is the Mask app.

Mask App

Mask is an educational, self-diagnosis, and contact tracing app that was developed by a consortium of volunteer independent researchers and university professors. The app's administrators claim that Mask is the only app to have been officially sanctioned by the MHME, and that the team cooperates closely with the ministry to share data (for example, to produce risk-area maps), but they consistently state that their team does not work directly with the government. Based on the FAQ shared on Mask's website, the app developers are allegedly the only ones with access to most of the data gathered, and they claim to only share less sensitive data with the MHME, such as self-reporting by users on their health conditions. Throughout their FAQ, the developers emphasize the app's high security and data privacy standards. However, they also mention the possibility of sharing information with security organs in the event of a judicial order, raising some concerns about the anonymization of the data.

The app's tracing is based on Bluetooth technology, and does not appear to have the ability to share online location monitoring. In addition, the app clearly communicates options to the user concerning whether to enable or disable data sharing. At the most recent count, the app had been installed by approximately one million users. Although the app has been supported and advertised by many government officials, downloads remain far fewer than the initial AC19 app, likely due in part to the distrust generated by the AC19 rollout and subsequent controversy.

During the course of our research, we contacted someone involved with the creation of the Mask app, who assisted with distribution and administrative matters (referred to here as "Mask Team Member"). The Mask Team member reiterated that the team involved did not receive any compensation from the Iranian government to create the app. The Mask Team Member also emphasized the protection of user information, and while they did not elaborate (the Mask Team Member was not part of the development of the app), they stated that the team "dealt with this information with top secrecy standards. The information the users entered into the app has remained highly secret and fully protected."[24]

The Mask Team Member also provided a useful perspective on government and Mask developers' viewpoints surrounding the contact tracing element of the app.

> "After a while we came to the conclusion, as many empirical studies suggest, that unless at least 60% of the population uses the app, the contact tracing function will not be useful. Therefore, the application focused on producing infection maps, i.e., risk-area maps in different colors (red, yellow, etc.). Such infection maps were then used by the government. In this way, Mask became the metric to define the situation of a city and

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[24] Interview with Mask Team Member.

help decide what measures needed to be taken. For example, when a city was categorized as red on the infection map, then the Friday prayers had to be canceled.

The contact tracing function was ultimately given up after further consultation with the ministry, but it can still be used individually. The data regarding contacts remain only on the smartphone of the users and will not be shared with officials from the Health Ministry, and the data gathered in the past were all deleted so that no institution can access them."

The Mask Team Member explained that the next iteration of the app would be unlikely to include a contact tracing element at all. Instead, the app is likely to focus primarily on providing risk maps and serving as an educational and outreach tool to help Iranians access healthcare when needed. These risk maps are provided both to the public and to the health ministry itself – for the former, to help members of the public avoid high-risk areas, and for the latter, to inform policy decisions.

Next, we interviewed an expert on Iran's mobile tech environment (hereafter referred to as "App Expert") to get a better understanding of how Mask works, how citizens have responded to the app, and other tech-based efforts the IRI government may be making to combat Covid-19.

One of the main takeaways from this interview was that, while the public-facing information for Mask app has consistently claimed high levels of security, there is simply no way to independently verify these claims. The App Expert stated that while most of the questions about data collection were answered on Mask's public-facing FAQ, there are questions about whether "you can take their word for it" because "the server/database code is not open sourced, so we can't verify these claims." The real value of the app from a public health perspective is also fairly questionable – since there is no governmental contact tracing system in place, the data seems to only be useful for creating things like risk maps, or potentially for warning users who have been in contact with someone who has Covid-19. However, we have seen no evidence of individuals being warned about contact with infected people, and based on our interview with the Mask Team Member, this kind of functionality seems unlikely.

While the app has been used to create color-coded virus heat maps, the data that have been shared remain questionable and, ultimately, not very useful to the public. Notably, information such as how many people have been identified as positive Covid-19 cases through the app, how many individuals have had a test based on information they received from the app, or how many people tested positive/negative for Covid-19, has not been shared publicly. Based on the government's misinformation campaign surrounding the spread of the disease, it is unlikely that this information will ever be made public, or if it is, there are concerns about whether the information shared could be considered trustworthy.

When asked about the effectiveness of the Mask app, the App Expert mentioned the following:

"I think any contact tracing will have a positive impact on reducing the spread of Covid and could, at the very least, inform individuals of the risk. However, I can't comment on the reliability of Mask's data. They [the Mask app developers] need to be much more upfront about their privacy policy and data management. However, they did well in responding to questions from the community, and I would give them the benefit of the doubt, that they were a volunteer group."

The FAQ from the Mask website mentioned the following with regard to what data is gathered and how it is used:

What data is gathered?

1. Self-declared data:

These are data that you personally enter in different sections of the application: phone number and national ID number, places you visited and manually choose to register in the app, visits and meetings you register manually in your app either through QR code or through Bluetooth, information about your daily health condition, questions you ask the Mask team, information on those places for which you create a QR Code, and if you register your family members, their phone numbers and national ID numbers.

2. Automatically recorded data:

Mask can automatically record places you have visited or meetings you had, through Bluetooth technology. To activate this function, Mask sends you a message and asks your permission. Whether this option is activated or not can be seen on your profile page (My Mask) and is indicated by two check marks at the top of the profile page.

When at least one of these check marks is activated, in the notification area of Android there is permanent notification reminding you that "your Mask is activated." It is important to mention that data related to the device you use (User Agent) as well as related to your internet network (IP) can be registered in certain cases in its log-format to increase the security of the app and to identify hacker attacks against Mask.

How Your Data is Used:

"The data you gather and save in Mask will only be used to fight Covid-19 in Iran, and Mask will not allow your anonymized data to be used for scientific purposes. *Mask will try to delete your data* [emphasis added], as soon as it has become useless in the fight against Covid-19. It is important to mention here that

only the data that you enter in the section "your daily health information" will be shared with the Health Ministry. In this way the Health Ministry can use the data in your digital health records to improve its services to you. *Last, information entered in The Mask may be shared with judicial courts if a request is made*." [emphasis added][25]

While the Mask app appears likely to be, at the very least, an improvement on the initial AC19 app, there remain legitimate concerns around the use of the data collected and its effectiveness in fighting Covid-19. Furthermore, the early failures of the AC19 app may have caused irreparable harm to the public's confidence in using such apps to fight the disease.

Independent Audit of the Mask App

In addition to our interviews and analysis, an independent audit of the Mask app was commissioned in December 2020. The technical experts downloaded and analyzed Iran's Mask app, along with similar apps deployed in different countries. Their findings elaborated upon and corroborated many of our concerns noted above.

Among the most notable findings were:

Privacy Threats from the App's Exposure Notification Service: The researchers investigated the Mask app's voluntary Covid-19 exposure notification service, and noted with concern that its data "is centralized and does not implement any anonymization technique whatsoever."[26] This lack of anonymized data provides extensive risk of function creep for the app, particularly in terms of law enforcement. The app's own privacy policy noted that "if a legal order is issued by the judicial authorities, Mask will be obliged to present your information to the court."[27]

Anti-Analysis Features and Code Obfuscation: The report noted with concern that their team could not reliably determine the full purpose of many of the app's features due to the app's extensive use of "anti-analysis features" like obfuscated "class names and methods" and other features.[28] The team notes that these features "make the analysis of the app harder and impede to accurately identify [sic] some potentially harmful behaviors." The team further noted that they could not "identify any public repository containing the source code of the application," which created additional barriers to their analysis.

Finally, the researchers noted that some features that may appear justified, like the app being granted access to a user's camera in order to read QR codes, may themselves be dangerous from

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[25] The information shared here was taken from the FAQ section for the Mask app, and has been lightly edited/translated for clarity.
[26] "Report on the Privacy Risks of COVID-19 software." December 2020.
[27] Ibid.
[28] We recommend reading the report for the full technical analysis "Report on the Privacy Risks of COVID-19 software," December 2020.

a privacy and security perspective. While such permissions are generally innocuous, the team said they could not "reliably discard [the possibility of threat] due to the limitations of our analysis because of the use of code obfuscation and other anti-analysis techniques."[29]

Read/Write Capacities to External Storage: Another threat identified by the team is the app's ability to access both the READ_EXTERNAL_STORAGE and WRITE_EXTERNAL_STORAGE permissions on a user's phone. The app's purpose for gaining access to these features is unclear, but the team notes that the request for these permissions is not explicitly stated in the app's privacy policy statement, and nor is there any evidence in the code that users are explicitly asked to grant this permission. However, due to the obfuscation techniques noted above, the report is uncertain what the purpose of these permissions is, and notes that further analysis is required.[30]

Presence of Software Development Kits (SDKs): The team notes the alarming presence of SDKs on the app for analytics and tracking purposes. While SDK use may be justified in order to monitor app adoption and use, installation counts, and the use of specific app features, or to report errors to developers, the presence of such a variety of SDKs in this app, and their extensive tracking capabilities, indicate what the team calls a "unnecessary privacy risk for users of an app of this nature." They further note that the use of such SDKs "does not meet the expected privacy-by-default / privacy-by-design requirements" for apps such as this. The team notes that the app's "privacy policy does not describe the presence of other parties in the code that can be considered data processors, such as the SDKs with tracking and monitoring capabilities described above."[31] In short, the full purpose of these features, what they gather and who they report to, is not made clear to the user.

Summary of Other Technological Resources

The Iranian government has authorized a number of other technological measures to help combat the virus. These include:

Hotlines: Citizens are able to dial either "4030" or "115" in order to receive general information surrounding Covid-19 and an explanation of available resources. Callers can also request additional instructions if they or someone they know has Covid-19 symptoms.

Informational and Educational Apps and Websites: These sites provide general information for individuals to protect themselves from the virus. This information includes hygiene tips, social distancing rules, area risk assessment, location of test stations and healthcare facilities, and more.[32]

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[29] Ibid.
[30] Ibid.
[31] Ibid.
[32] coronaapp.ir (Safiran Salamati), pezeshket.com (also available in application form) and 123corona.com.

<u>Self-Screening and Self-Care Websites:</u> The primary official website of the Ministry of Health and Medical Education is Salamat.gov.ir. This website provides information on Covid-19 related self-screening and self-care. On the platform, citizens can input their government ID number and address, followed by an online self-assessment. If the results of the self-assessment indicate a potential Covid-19 infection, the user will be contacted by public health workers who will provide further instructions regarding self-care, isolation, proceeding to a test station, and more. Apart from Salamat.gov.ir, there are a handful of non-governmental platforms for self-assessments that do not request personal information, such as test.corona.ir.

<u>Thermography and Temperature Checks:</u> At the onset of the pandemic, there was widespread use of thermometers at municipal points of entry, including freeways, airports, and bus terminals, in order to screen travelers. The goal of these screenings was to introduce some degree of city-wide, province-wide, or regional quarantine in potential Covid-19 hotspots. In some cases of suspected Covid-19 infection, the use of thermometers was followed up with further medical investigation. There have also been reports of using thermometers at the entrances to government buildings and large retail markets. Following controversial discussions among experts regarding the efficiency of using thermometers, usage has dropped dramatically in recent months (especially at the entrance to cities).

<u>Disinfection of Public Spaces:</u> Public buildings and public transportation, and in some cases even open streets, parks, and private vehicles, were disinfected on a massive scale, sometimes by agricultural aircraft. Municipality workers, military and paramilitary personnel (i.e., Basij) were recruited for this task. After debates about the efficiency of such measures, the practice of disinfecting streets and parks was abandoned.

As our team began finalizing this report toward the end of 2020, the situation started to change dramatically. A third wave of Covid-19 began raging through Iran, and authorities commenced talking more openly about using controversial surveillance methods for the first time as a response to the virus. For example, on November 16, 2020, the Minister of Roads and Urban Development warned citizens that it planned to use mobile phones to track and trace citizens who had contracted the virus as a means of enforcing self-isolation and quarantine measures. This was the first instance our team found of a high-ranking government official openly discussing tracing and monitoring citizens using their mobile phones.[33]

Vulnerable Group: Political Prisoners

Prisoners, particularly political prisoners, represent one of the most vulnerable groups in Iran during the Covid-19 pandemic. Before the pandemic began, it was estimated that around 240 thousand prisoners were being held in 268 detention facilities. In terms of incarceration rate, this

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[33] "Corona in Iran; Traffic restrictions in 25 centers of Iran province Wednesday morning." *BBC Persian*, November 17, 2020. https://www.bbc.com/persian/iran-54970608

equates to approximately 294 prisoners per 100,000 population, ranking 37th worldwide.[34] According to the latest statistics, around 97-98% of prisoners are male, approximately 38% have been convicted of drug-related crimes, 30% of financial crimes and theft, and 10% have been imprisoned for personal offenses. There are several reports from international human rights organizations as well as the UN's Special Rapporteur on human rights in Iran documenting overcrowding in Iran's prisons – with some prisons reaching as much as 2-3 times their capacity.[35] These limitations have also created a shortage of basic facilities for health and hygiene, leading to inhumane and deplorable conditions.[36] Some prisons have had such poor records on health and hygiene that diseases such as scabies and tuberculosis have spread rapidly among prisoner populations.[37]

This section examines the measures the Iranian government has taken to protect prisoners from Covid-19, and the consequences of these measures. We aimed to answer the following question: Have political prisoners in Iran been systematically discriminated against during the Covid-19 pandemic? Discrimination here means a lack of access to mandated protections like healthcare and safety-related furloughs. Our research included both desk research and an interview with a human rights expert who specializes in researching Iran's prison system (hereafter referred to as the "Political Prisoner Expert"). Our research leads us to conclude that the IRI government has used the extraordinary situation of the Covid-19 pandemic as a tool to punish political prisoners, apply even more pressure on dissidents, and strengthen its own position.

Measures Taken by the Prison Authorities

After finally publicly accepting the existence of the virus, Iranian prison authorities stated that they would take special sanitary and administrative measures to combat virus spread in prisons. These alleged measures included cancelling social, cultural, and religious programs within detention facilities; putting new limitations on family visits; disinfecting prison facilities on a daily basis; distributing hygiene and protection supplies to prisoners; and setting up task forces to monitor the situation, and to enforce isolation and quarantine measures when needed.[38] However, in line with the rest of the government's response to the pandemic, Covid-19 within prisons has been treated as a matter of national security. Iranian prison authorities have so far refused to release any statistics on cases of infections and fatalities, insisting that the measures they have

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[34] "Highest to Lowest Prison Population Total." *World Prison Brief.*
https://www.prisonstudies.org/highest-to-lowest/prison-population-total

[35] "With an annual admission of 500,000 people: The number of prisoners entering Iran is 'more than the global scale.'" *Center for Human Rights in Iran.* https://persian.iranhumanrights.org/1394/02/prison-capacity-iran/

[36] "Deplorable conditions, degrading treatment in Iran's overcrowded prisons: report." Article 18. February 27, 2020. https://articleeighteen.com/news/5622/

[37] HRA News: https://www.hra-news.org/2020/hranews/a-25561/

[38] "All measures taken by the judiciary to deal with coronavirus in prisons; granting leave to 70,000 people." *Tasnim News* (Farsi) همه اقدامات قوه قضائیه برای مقابله با کرونا در زندان‌ها؛ اعطای مرخصی به 70 هزار نفر - اخبار حقوقی و قض - اخبار اجتماعی تسنیم

taken have been effective, although an abundance of leaked information and reports from human rights activists prove otherwise.

Since the beginning of the pandemic, human rights activists with contacts inside Iranian prisons have steadily published reports counting and documenting cases of infections and fatalities. These reports suggest that the prison administration is overwhelmed by the health crisis caused by Covid-19.[39]

In addition, Amnesty International published an alarming report containing leaked communications between Health Ministry officials and prison authorities that reveal that Iranian officials have been concealing the true magnitude of the prison health crisis.[40] The report notes that the prison administration has not received adequate support or resources from other government departments in implementing effective sanitary and administrative measures. A report from the Boroumand Foundation, which contained testimonies from prisoners countrywide, outlined how most prison facilities fail to provide hygiene supplies such as detergent, disinfectants, and masks to prisoners; and that oftentimes these supplies must be purchased by the prisoners themselves. This situation places those prisoners without access to financial resources at particularly high risk.[41]

Measures Taken by the Judiciary

Apart from the administrative and sanitary measures implemented by prison authorities, the judiciary has also taken some measures to reduce population density inside prisons. Officials began granting pardons, early dismissals, and furloughs on a massive scale and temporary judicial emergency decrees were also issued to reduce the number of new detainees as much as possible. During the first wave of the pandemic (February-May 2020), more than 100 thousand prisoners benefitted from such measures, either by being prematurely released or sent on furloughs. The remaining prisoners were unable to benefit because they had been convicted of more serious crimes, had heavier prison sentences, were unable to post bail, or were considered a flight risk.[42]

For the prisoners who had to remain behind bars, the deplorable conditions mentioned above led to widespread fears of being infected, and there were riots in dozens of prisons.[43] These riots

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[39] "At least nine other people have died in Iranian prisons after suffering from coronavirus." *Iran International*.com
مرگ دست‌کم ۹ نفر دیگر پس از ابتلا به کرونا در زندان‌های ایران
[40] "Iran: Leaked official letters reveal state denial of COVID-19 crisis in prisons." *Amnesty International*. July 31, 2020.
https://www.amnesty.org/en/latest/news/2020/07/iran-leaked-letters-reveal-state-denial-of-covid19-crisis-in-prisons/
[41] "COVID-19 Fear in Iran's Prisons: Iran Must Do More to Protect Prisoners." *Abdorrahman Boroumand Center*. September 2, 2020. https://iranrights.org/library/document/3764
[42] "A shocking report on the plight of prisoners during the outbreak of the Coronavirus." IranWire (Farsi)
https://iranwire.com/fa/features/37988
[43] "Leave and amnesty in the coronavirus: What is the prisoner revolt for?" IranWire (Farsi)
https://iranwire.com/fa/features/37529

prompted a violent crackdown by officers and security forces, who in some cases used live ammunition and tear gas. Approximately 35 prisoners were killed, and hundreds of others were injured.[44] After the riots were suppressed, many furloughed prisoners returned to prison, and thousands of new prisoners joined them. As the pandemic has continued, Iranian officials have alternated between furloughing prisoners, returning them to prisons, and increasing or decreasing prison rolls in an ad-hoc manner. There are currently no reliable statistics on the current situation, but reports from within prisons indicate that the policies attempting to reduce the population density have been insufficient to alleviate overcrowding.

In our interview, the Political Prisoner Expert explained the state of prisons in Iran, and emphasized the poor sanitary conditions:

> "We know that before the pandemic started prisons were already extremely overcrowded, normally up to three or four times more than their capacity. Overcrowding was sometimes so dire that in some cases prisoners had to sleep on bathroom floors. Therefore, the measure to send prisoners on massive furlough was a good one. But it was not enough, and prisons are still over-populated and implementing sanitary measures or practicing social distancing is still impossible."

Measures Taken Against Political Prisoners

Iran has a poor record of dealing with religious diversity, intellectual critiques of the government, and oppositional civic and political activism. Currently, hundreds of prisoners of conscience and political prisoners are behind bars. They are writers, artists, practitioners of minority religions, civic and political activists, journalists, unions, human rights activists, women's rights activists, and members of opposition parties who are prosecuted and imprisoned as a result of their beliefs. They constitute an especially vulnerable sub-group of the prisoner population and thus deserve special attention and focus. As of October 5, 2020, United for Iran's Iran Prison Atlas (IPA), the most comprehensive database on Iranian political prisoners, estimates the total number of political prisoners currently behind bars at around 636.[45]

Following the judiciary's decision to reduce population density, its spokesman claimed that nearly half of the nation's political prisoners would be included in the new measures. However, reports indicated that only approximately 100 of a reported 636 political prisoners had benefitted, either by being fully pardoned or granted a temporary furlough.[46] Furthermore, the IPA team has learned that more than 60 political prisoners who qualified for the amnesty had not been released

[44] "Iran: Prisoners killed by security forces during COVID-19 pandemic protests." Amnesty International. April 9, 2020.
https://www.amnesty.org/en/latest/news/2020/04/iran-prisoners-killed-by-security-forces-during-covid19-pandemic-protests/
[45] For updated figures and analysis, see the Iran Prison Atlas: https://ipa.united4iran.org/en/
[46] "Corona and political prisoners: Who has been released?" *Radio Zamaneh* (Farsi)
https://www.radiozamaneh.com/497851

as of April 25, 2020. In addition, many of the political prisoners who had temporarily left prison on furlough and qualified for the amnesty were returned to prison within the following few months.[47] This blatant discrimination against political prisoners led to protests from prisoners themselves, as well as from human rights activists and organizations both inside and outside the country.

Nasrin Sotudeh, a prominent human rights activist currently detained in Evin Prison, has gone on multiple hunger strikes since the outbreak of the pandemic, demanding the release of political prisoners and the improvement of health and sanitary conditions.[48] In another act of protest, dozens of political prisoners in Evin Prison organized a sit-in to protest discrimination against political prisoners, and demanded improvement to healthcare facilities.[49] Narges Mohamamdi, a prominent women's rights activist and political prisoner infected with Covid-19, wrote an open letter claiming that she and other infected prisoners with underlying health conditions had not received proper healthcare.[50] In an act of solidarity, activists organized an online campaign on Twitter under the hashtag شکنجه_با_کرونا# (#torture by corona) in support of political prisoners.[51]

Systematic Use of Medical Care Deprivation as Punishment against Political Prisoners

The Islamic Republic has a dark history of depriving political prisoners of medical care as an intimidation tactic. In a report from 2016, Amnesty International accused the Iranian government of using this practice "as an intentional act of cruelty intended to intimidate, punish or humiliate political prisoners."[52] Amnesty and other organizations have expressed serious concerns that Iranian officials are continuing these same patterns and methods during the Covid-19 pandemic.[53] In a 2020 report, Amnesty accused many governments across the world, including Iran, of misusing the pandemic to increase pressure on prisoners of conscience. This same report asserts that the exclusion of these prisoners from pardon and furlough measures "appears to be

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[47] "Iran: Leaked official letters reveal state denial of COVID-19 crisis in prisons." *Amnesty International*. July 31, 2020.
https://www.amnesty.org/en/latest/news/2020/07/iran-leaked-letters-reveal-state-denial-of-covid19-crisis-in-prisons/
[48] "Political Prisoners Remain Behind Bars as COVID-19 Surges in Iran. This Activist Is Risking Her Life to Get Them Out." *Time*. August 14, 2020.
https://time.com/5879513/iran-nasrin-sotoudeh-hunger-strike-prisoners-covid-19/
[49] "Sit down in ward 8 of Evin following the outbreak of Corona in prison; Nasrin Sotoudeh's hunger strike." *Radio Farda* (Farsi) https://www.radiofarda.com/a/evin-prison-coronavirus-outbreak/30776642.html
[50] HRA News (Farsi) https://www.hra-news.org/letters/a-815/
[51] "Twitter Storm; the Iranian regime tortures political prisoners with corona." *VOA News* (Farsi)
https://ir.voanews.com/civil-rights/iran-human-rights-corona-virus
[52] "Iran is putting political prisoners' lives at risk by denying them medical care." *Amnesty International*. July 18, 2016.
https://www.amnesty.org/en/latest/news/2016/07/iran-is-putting-political-prisoners-lives-at-risk-by-denying-them-medical-care/
[53] "Iran: Leaked official letters reveal state denial of COVID-19 crisis in prisons." *Amnesty International*. July 31, 2020.
https://www.amnesty.org/en/latest/news/2020/07/iran-leaked-letters-reveal-state-denial-of-covid19-crisis-in-prisons/

an additional punishment for their activism or their views and increased the risks they face in prison as they continued to be held in unsanitary and overcrowded prisons."[54]

One example of this healthcare deprivation tactic is the case of Zeynab Jalalian, who has been forcibly disappeared since June 25, 2020, after a 6-day hunger strike against the authorities' refusal to transfer her to a medical center for Covid-19 treatment. In another case, that of Narges Mohammadi, Amnesty International highlighted the authorities' refusal to inform prisoners of the results of their Covid-19 tests, causing psychological harm.[55]

The Islamic Republic argues that Iran has done more than most nations to protect prisoners during the pandemic. On April 6, 2020, Asghar Jahangir, the head of Iran's prisons organization, stated that "Iran must be recognized internationally for its efforts to protect prisoners during the Covid-19 outbreak." Jahangir went on to claim Iran's prisoners enjoy "better standards of healthcare and sanitation than they would in society," and that medical teams have been stationed in prisons around the country to monitor prisoners' health daily and transfer infected prisoners to external hospitals. As a result, he claimed that there has not been one single Covid-19 related death in Iran's prisons.[56]

However, the information from Amnesty International, prisoners and their families, and independent human rights defenders paints a grim picture. The Amnesty International report, for instance, states that "Amnesty International has received distressing reports of prisoners displaying Covid-19 symptoms being neglected for days, even when they have pre-existing heart and lung problems, diabetes, or asthma. When their conditions worsen, many are merely quarantined in a separate section in the prison or placed in solitary confinement, without access to adequate healthcare."[57]

In our interview, the Political Prisoner Expert corroborated this information:

> "From many prisons we do not have 100% reliable information, but in prisons from which we have very reliable sources of information (such as Evin, Fashafoyeh, Sanandaj, Erdebil and others), I can say that there is no medical treatment or regular testing for those suspected of being infected with Covid-19. We know that those showing symptoms are only being sent to quarantine wards. And since there is no testing, sending them to the quarantine ward could potentially put them in even greater danger."

In addition, the Political Prisoner Expert has stated that there was no Covid-19 testing for prisoners who were returned to prison following furlough. Instead, they are simply kept in

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[54] "Daring to Stand up for Human Rights in a Pandemic." *Amnesty International*. August 2020.
https://www.amnesty.org/download/Documents/ACT3027652020ENGLISH.PDF
[55] "Iran: Leaked official letters reveal state denial of COVID-19 crisis in prisons." *Amnesty International*. July 31, 2020.
https://www.amnesty.org/en/latest/news/2020/07/iran-leaked-letters-reveal-state-denial-of-covid19-crisis-in-prisons/
[56] Ibid.
[57] Ibid.

quarantine for a few days. Other reports have corroborated this information, and have shown how political prisoners have contracted Covid-19 at a disproportionate rate.[58]

The Political Prisoner Expert also gave additional examples of how Covid-19 has been used as a threat against political prisoners, stating the following:

> "While we do not know the exact scale and extent of using corona-measures to punish or harass political prisoners, it's likely that there are many isolated cases in which security officials used coronavirus to harass political prisoners. We highlighted the example of Amirhossein Moradi in our news report. He was subjected to acts that would amount to mental torture. As noted in the report, while undergoing medical treatment, Moradi was falsely informed by interrogators that he would be executed the following week, so the interrogators believed it did not make financial sense to keep spending money on his medical treatment. The detainee was also falsely told that he had contracted Covid-19, and was transferred to closed quarters in detention, purportedly to quarantine him. In fact, he had not contracted the virus and this was just intended as punishment."

Given the above, the Political Prisoner Expert believes that we have enough information to identify the following trends concerning discrimination against political prisoners when compared to ordinary prisoners:[59]

- Not receiving Covid-19 related furloughs
- Not receiving Covid-19 related pardons
- Not receiving adequate medical care while imprisoned
- Not being provided safe facilities and living quarters while in prison.

Vulnerable Group: Journalists

Another particularly vulnerable group during this period has been the nation's journalists. The Islamic Republic's view that the Covid-19 pandemic should be "securitized", led to offering the public a carefully crafted narrative of the nation's success in combating the pandemic. Journalists, particularly independent journalists, have faced especially harsh treatment when sharing news that contradicts the official narrative about the pandemic.

The regime tightened its grip on the press during the pandemic under the pretext of fighting "rumors", "false news" and "disinformation", or even of "protecting the psychological health of the population." Even before the pandemic, Iran had one of the worst records regarding respecting and safeguarding the freedom of the press and media. In the past 40 years, the Iranian

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[58] "Political Prisoners in Iran Contracting COVID-19 at Alarming Rate." *Center for Human Rights in Iran*. August 11, 2020. https://iranhumanrights.org/2020/08/political-prisoners-in-iran-contracting-covid-19-at-alarming-rate/
[59] Interview with Political Prisoner Expert.

government has invested massively in monitoring and punishment to enforce its control of the flow and the circulation of information and, thereby, the public sphere and public discourse. Based on this, it is not surprising that the Committee to Protect Journalists (CPJ) has put Iran among the 10 Most Censored Countries. This ranked list comprises countries whose governments tightly control the media both through new "sophisticated digital censorship and surveillance" techniques as well as the "more traditional methods to silence independent media" such as jailing and harassing journalists and their families.[60] Similarly, Reporters Without Borders ranked Iran 173rd out of 180 countries in its annual ranking of press freedom.[61] As of September 25, 2020, there were an estimated 68 journalists in prison.[62]

In our effort to further understand the unique challenges faced by journalists during Iran's Covid-19 crisis, we interviewed a seasoned and well-connected Iranian journalist (referred to hereafter as "Iranian Journalist"), who summarized the early phases of the Covid-19 pandemic as follows:

> "From the beginning [of the pandemic] onwards, journalists were not able to freely report on Covid-19, because the regime securitized this matter. In the beginning, for nearly two months, the regime even tried to conceal the very existence of the virus in Iran. They thought the virus would fade away by itself. They may have had some political considerations for concealing the existence of the virus, such as holding the parliamentary elections or holding nationwide celebrations on the anniversary of the Islamic revolution. As part of the securitization of the matter, the act of reporting on the pandemic became somehow illegal or criminal, both for professional journalists and for citizen journalists. From the beginning, they launched a campaign of arrests and intimidation against those who dared to report on Covid-19 in Iran who were contradicting the official narrative. They were accused of causing a public uproar.
>
> For example, in Qom, one person, I think a physician, reported that the hospital had Covid-19 cases and was later arrested."

The Iranian Journalist further reported that professional journalism in Iran has been negatively affected by the government's repressive policies in two ways. First, journalists who have accurate information that reflects the reality on the ground cannot share it for fear of reprisals. Second, professional journalists who work for the media that are still allowed to operate are only able to access and publish the official statistics and narrative – an engineered view of the state of Covid-19 in Iran, which presents a distorted representation of reality.

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[60] "10 Most Censored Countries." *Committee to Protect Journalists*. https://cpj.org/reports/2019/09/10-most-censored-eritrea-north-korea-turkmenistan-journalist/
[61] "2020 World Press Freedom Index." *Reporters Without Borders*. https://rsf.org/en/ranking
[62] For up-to-date figures, see https://journalismisnotacrime.com/en/

Legal Precarity of Journalists in Iran

In Iran, as in many other authoritarian systems, the principles of the freedom of the press and opinion are guaranteed *on paper* and codified in laws regulating the production and dissemination of information; however, every year thousands of journalists and citizens are prosecuted and persecuted for reporting on incidents of public interest, or for sharing critical information and ideas in the form of journalistic or opinion pieces. These hostile government reactions happen when journalists and citizen-journalists have crossed some informal red lines set by the regime's political elites. These red lines are mostly kept on an informal level (i.e., they are not explicitly declared or codified in laws) and can easily shift from time to time, and from context to context. For example, in some cases, reporting on corruption or incompetency of government officials is allowed and even encouraged. Reporting that criticizes officials who belong to influential circles or power centers in the regime, however, can result in legal or extralegal prosecution and persecution. The same informal principles have applied to the act of reporting on Covid-19.

Many journalists (especially citizen-journalists) were not aware of the new informal red lines being drawn on producing and disseminating Covid-related news and information before the intimidation and arrest campaigns started. Subsequently, many citizen-journalists were persecuted without understanding the consequences of their reports. This system, propped up by a deficiency in the rule of law and transparency, makes journalism (and to some extent all forms of civic activism) a precarious and dangerous profession in Iran.

The Iranian Journalist described some of the institutions involved in enforcing the official narrative and their tactics as follows:

> "The Iranian Cyber Police summoned social media users and threatened them. Those more publicly known journalists and online activists were targeted instead by intelligence services of both the government and the Islamic Revolutionary Guards Corps (IRGC). There were also many cases of harassment and intimidation of journalists mainly committed by IRGC agents. Many journalists were called while they were working in the editorial offices or on their cell phones and were told not to speak about the pandemic."

Other news from within Iran confirmed these claims. In a May 2020 report, the head of the Iranian Police, Hossein Ashtari, stated that 1,300 online platforms were being monitored, and 320 individuals had been arrested by the force under his command because of Covid-related online criminal activities. However, he did not provide more details of the exact accusations or the legal basis for their arrest. Ashtari only stated that many of these platforms have been involved in "rumor-spreading" and in "disconcerting public opinion."[63] In another report from March 2020, the head of the Iranian Cyber Police, Vahid Majid, reported that his force had

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[63] IRNA News (Farsi) نیروی انتظامی با تشویش‌کنندگان ۱۳۰۰ تارنمای مجازی در زمان کرونا برخورد کرد

started a full-fledged crackdown campaign against false news on Covid-19, and threatened those spreading false news and disinformation with severe consequences. According to him, 118 individuals had been summoned to police offices and received warnings, and another 24 had been arrested.[64]

The military forces, namely the IRGC, also launched a crackdown campaign on the free flow of information on Covid-19. For example, according to a March 2020 report, the IRGC intelligence branch in the province of Fars announced that it had arrested 150 online activists/citizen-journalists for spreading rumors and false news about the pandemic, without providing further details.[65] These detainees were mostly the administrators of popular Telegram channels or Instagram pages.

Almost simultaneously, the Iranian Attorney General, Mohammad Jafar Montazeri, gave the new informal red lines being gradually drawn and enforced by security and intelligence institutions a legal undertone. In an unusual statement, Montazeri declared that "any statement transgressing the official frame (official narrative) could be considered as acting against the national interest and national security and thus can be prosecuted."[66]

There have been several reports of whistleblowers who were arrested because they revealed or shared information on the Covid-19 situation on their social media networks. For example, one citizen from the province of Kurdistan was arrested for publishing a video he took in a hospital, revealing that despite the official narrative (at the beginning of the pandemic), there were patients hospitalized because of Covid-19.[67] In another case, a nurse was arrested in the province of Qom for leaking information about the number of Covid-19 cases.[68]

Among the most brazen reprisals against journalists is the case of Mohamad Mosaed, a prominent and internationally renowned journalist and Committee to Protect Journalists (CPJ) awardee. In February 2020, Mosaed was summoned to the office of the IRGC's intelligence branch after tweeting a post that was critical of the Iranian government's Covid-19 policy. Initially, he was arrested for a short time, but in August 2020 he was sentenced to nearly five years in prison, a two-year ban on journalism activities and a two-year ban on using all communications devices.[69] According to the Iranian Journalist, Mr. Mosaed has since been released on bail, but remains in a precarious legal position.

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[64] "Arrest of 24 people and summoning and warning 118." *Didban* (Farsi) بازداشت ۲۴ نفر و احضار و تذکر به ۱۱۸ شایعه‌پرداز مجازی کرونا

[65] Basij News (Farsi) برخورد قاطع با عاملان انتشار شایعه کرونا/شناسایی ۱۵۰ نفر از منتشر کنندگان اخبار کذب در فارس

[66] See the Report from Journalism is Not a Crime (Farsi) https://www.journalismisnotacrime.com/fa/features/3707/

[67] Khabar Online (Farsi) عامل انتشار شایعه شیوع کرونا در کردستان بازداشت شد

[68] Alarbiya (Farsi) ایران...بازداشت یک پرستار به دلیل ارائه آمار فوتی‌های کرونا در قم

[69] "Iran takes action against DW Freedom of Speech Award laureate Mohammad Mosaed." *DW*. https://www.dw.com/en/iran-takes-action-against-dw-freedom-of-speech-award-laureate-mohammad-mosaed/a-54882010

In another instance, an entire newspaper was banned in August 2020 after publishing an interview with a member of the National Anti-Covid Headquarters, in which the member questioned and criticized the statistics being published by the government.[70]

In summary, journalists in Iran have faced a particularly daunting task reporting on the Covid-19 pandemic, as they have been unable to report accurately on the crisis without fear of retaliation. Journalists who have dared to refute the official narrative of the pandemic have faced intimidation, the loss of work, legal threats, and arrest.

Pillar 3: Function Creep of Alternative Means and Impacts on Access to Resources

Vulnerable Group: Afghan Refugees and Migrants

Refugees and migrants in many places are discriminated against (under codified laws and governmental regulations imposed by nation-states) compared to individuals holding citizenship. Apart from being deprived of some political and economic rights (such as the right to vote or the right to own property), their access to some economic, social, and cultural resources is also structurally restricted. Examples include access to the job market, banking and financial facilities, education, social security, the welfare system, and the healthcare system. These factors make refugees and migrant communities particularly vulnerable in most nations. Iran is no exception.

This section examines how unreliable access to healthcare has disproportionately affected refugee and migrant populations. Key areas of concern include the effects of administrative measures taken by the Iranian government – including lockdowns, border controls, and school closures – on migrant populations. Because a majority of migrants and refugees in Iran are Afghan nationals, we have primarily focused on their situation.

Deepening of Anti-Immigration Policies and Sentiment during the Pandemic

There are several reports mentioned below on a general change of attitude toward migrant populations, which has manifested itself both in a significant increase in the number of deportations as well as additional red tape in issuing or extending residence permits. There were reportedly several protests from the Afghan government and its embassy in Tehran, as well as from some NGOs. By taking a stringent anti-immigration approach, the government increased distress and hardship for vulnerable groups who were already suffering from discrimination and structural inequality.

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[70] "Jahan-e-Sanat newspaper was banned for publishing an interview about Corona's 'real statistics'." *BBC Persian* (Farsi) https://www.bbc.com/persian/iran-53720628

For example, when the pandemic broke out many businesses in Iran began to only accept electronic bank cards for payment. Many Afghan migrants still do not or cannot have a bank account, and therefore cannot access the majority of businesses. Although regulations regarding the right to have a bank account and card for non-citizens were modified several years ago (only for those registered refugees/migrants with legal residence papers) and are supposed to be adhered to by all institutions, banks have different policies which they implement arbitrarily, causing Afghan migrants' difficulties. [71]

The Effect of Lockdowns on Access to Welfare Services for Migrants and Refugees

Government measures restricting social life put more strain on groups that are dependent on welfare services provided by government institutions, private institutions, and charities. Resource-rich welfare organizations (such as Behzisti and Komit-e-Emdad) will generally only provide support for Iranian citizens – welfare services for refugees and migrants are outsourced to smaller private charities. As a result of the lockdown, these few small NGOs had to reduce their social and welfare services, and the government took few measures to fill the gap.

Many Afghan workers are regularly deprived of social security measures, like unemployment benefits, that are mandated in long-term contracts. This unfair treatment has impacted Afghan nationals who have been paying into Iran's social fund for as many as 30 years.[72]

Increased Border Controls and More Stringent Border Regimes

The Iranian-Afghan border is exceptionally challenging because of a longstanding and elevated number of illegal immigrants who suffer mistreatment at the hands of Iranian border forces.[73] In the aftermath of the Covid-19 crisis this violence has increased dramatically: Iranian security forces are accused of violently rounding up Afghan migrants and refugees and releasing them on the Afghan side of the border without going through any legal procedures.[74] In another incident, Iranian border security forces reportedly arrested 57 Afghan refugees, tortured them and threw them into a lake at the border, resulting in at least 27 deaths.[75] In another, a car transporting

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[71] Diaran (Farsi)
http://diaran.ir/%da%86%d8%b1%d8%a7-%d8%a8%d9%87-%d9%85%d9%87%d8%a7%d8%ac%d8%b1%d8%a7%d9%86-%da%a9%d8%a7%d8%b1-%d8%aa-%d8%a8%d8%a7%d9%86%da%a9%db%8c-%d9%86%d9%85%db%8c%e2%80%8c%d8%af%d9%87%d9%86%d8%af/
[72] Diaran (Farsi)
http://diaran.ir/%d9%85%d8%b5%d8%a7%d8%a6%d8%a8-%d8%b1%d9%86%da%af%db%8c%d9%86-%da%a9%d8%b1%d9%88%d9%86%d8%a7-%d8%a8%d8%b1%d8%a7%db%8c-%d9%85%d9%87%d8%a7%d8%ac%d8%b1%d8%a7%d9%86/
[73] Tasnim News (Farsi) ‫ورود 120 هزار تبعه غیر مجاز افغانستانی به ایران در ماه‌های اخیر /چرا 54 پاسگاه مرزی افغانستان تخلیه شد؟-‬
‫اخبار پلیس - اخبار اجتماعی تسنیم‬
[74] Afghanistan-Asia News (Farsi)
https://afghanistan.asia-news.com/prs/articles/cnmi_st/features/2020/03/17/feature-01
[75] BBC Persian (Farsi) https://www.bbc.com/persian/afghanistan-52513636

illegal Afghan refugees was fired on by Iranian security forces, resulting in many deaths and injuries. Following this incident, an Iranian-Afghan government commission was put in place to investigate.[76]

The Effect of Closures of Government Offices and Children's Right to Education

Parallel to the worsening of the anti-immigration policies and sentiments in government offices, migrants' children also suffered disproportionately under the new conditions. After international civil society organizations campaigned for years for migrant children's right to an education, Supreme Leader Ayatollah Khamenei issued an order and instructed the authorities in the Ministry of Education to accept all of the migrant children into schools. Even parents with no legal permission to stay in Iran were able to send their children to school, but they had to apply for permission through the *dafaater e kefalat* (immigrant affairs office). Although many parents still avoid going to such offices for fear of being arrested and deported, hundreds of thousands of Afghan children (an estimated 450 thousand) found their way into state and private schools. However, since the Covid-19 pandemic broke out, the government has cancelled or limited such services in the *dafaater e kefalat*, arguing that crowding at these immigration offices could aggravate the spread of the virus. Because of these limitations, an unknown number of Afghan children were deprived of education this year.[77]

Restrictions on Access to Healthcare and Medical Services and Facilities

Officials and authorities from the MHME insist that there is no discrimination against foreign Covid-19 patients. There are, however, numerous reports indicating that Afghan migrants, especially those without a residence permit, are being systematically discriminated against in the Iranian healthcare system. This discrimination is partly due to a wide-spread racist and xenophobic attitude against Afghans among Iranians. For example, at the beginning of the pandemic when there was a shortage of masks and disinfectants, many grocery and drug stores refused to sell such goods to Afghan nationals.

The government is also responsible for systemic discrimination. For example, most public health facilities such as hospitals or testing centers refused to accept patients without a national ID number (i.e., Iranian citizenship). Consequently, Afghan nationals (both those with a legal residence permit and those without legal status) could not receive healthcare services.

As criticism mounted and many hinted at the collateral damage that could arise if Afghan nationals did not receive healthcare services, officials from the MHME started to make some

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[76] Tasnim News (Farsi) ‫‫ـ؟شد تخلیه افغانستان مرزی پاسگاه 54 چرا/اخیر ماه‌های در ایران به افغانستانی غیرمجاز تبعه هزار 120 ورود‬
‫تسنیم اجتماعی اخبار ـ پلیس اخبار‬

[77] Hafteh (Farsi) ‫شدند محروم مدرسه و درس از مهاجر کودکان از گروهی‬

modifications. They declared that all Covid-19 patients, regardless of their nationality or their residence status, must receive healthcare services free of charge. However, many Covid-19 patients with Afghan nationality (especially those without legal papers) are still being deprived of or are having difficulty receiving free public healthcare services.[78] This systemic and structural discrimination, and the state's inaction to rectify it, may explain why the death rate from the virus among foreign nationals in Iran (mostly Afghan migrants) is almost twice as high as among Iranian citizens.[79]

Conclusions and Suggestions

Below are our key recommendations based on our research:

Develop a unified government response to the Covid-19 pandemic, considering both national and local-level government bodies: One of the core findings of our research was a haphazard response to the Covid-19 pandemic from the Iranian government, largely due to competing interests at different levels of government. Local government bodies and public health organizations sought early on to find ways to mitigate the impact of the virus, while officials at the national level sought to "securitize" the virus – viewing it as a national security threat which could damage their control over the population. This securitization led to statements and actions that often actively undermined the nation's response to the pandemic, leading to unnecessary infections, death, and confusion. *The government, especially at the national level, should find ways to coordinate the national response between governing bodies more effectively. The national government should also trust local and situated knowledge, allowing and empowering local and regional governments to act on behalf of their constituencies.*

The government and public health officials must work to develop and implement a unified and consensual approach to contact tracing: Another finding was the absence of any contact tracing method as the pandemic worsened. The only real efforts in this regard were through user self-reporting on various apps sanctioned by the Iranian government, and these were not followed up with expert contact tracing efforts in order to warn and isolate individuals who may have been exposed to the virus. The government's early efforts, which were implemented through the ill-conceived AC19 app, were ethically questionable and lacking in transparency regarding what data would be collected, how it would be used, and how it would be stored. The failure of the AC19 app generated a massive trust gap between governing bodies and the public that is still to be remedied. *Should the government seek to implement app-based contact tracing methods in the future, the above questions should be answered as clearly as possible in order to ensure user privacy, safety, and well-being.*

Consistently implement laws that allow prison furloughs or full pardons for all prisoners – including political prisoners: The Iranian government's considerable efforts to reduce the

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[78] Khabar Online (Farsi) روایتی از پذیرش افغانستانی‌های مبتلا به کرونا/ وزارت بهداشت: از اتباع پول نمی‌گیریم

[79] BBC Persian (Farsi) https://www.bbc.com/persian/iran-53629265

number of prisoners were not equitably applied. Evidence in this report indicates that many prisoners – especially those imprisoned for political purposes – were not given the benefit of furloughs or pardons, even when they technically qualified for release. In addition, political prisoners were often subjected to inhumane treatment. In the most egregious cases, Covid-19 was weaponized and used as a method of torture. *The Iranian government should not use anti-Covid policies to intimidate and crack down on political dissidents, nor should policies be used to punish imprisoned dissidents. The Iranian government ensure that its laws are consistently and equitably applied in order to reduce prisoner numbers, reduce the spread of the virus, and treat all prisoners equally.*

Respect the freedom of the press surrounding Covid-19 reporting: One of the early mistakes concerned government efforts to control Covid-19 reporting. Iranian citizens received conflicting information from state-run media outlets, independent outlets, and individuals reporting on their own – including medical professionals with access to hospitals and other health facilities. This led to a breakdown of trust concerning the pandemic, and has likely damaged efforts to spread reliable and actionable information. *Open, accurate, and transparent communication surrounding the virus will improve the public response and help prevent excessive infections, deaths, and long-term illness.*

Maintain and improve access to vital services for vulnerable populations – particularly Afghan refugees and migrant workers: As the pandemic continues, socially, politically, and economically marginalized groups – like Iran's Afghan refugees and migrant workers – will be particularly vulnerable in terms of their health and economic well-being, and their children's access to education and other resources. The Iranian government has failed to ensure that critical services remain available, and Iran's refugee and migrant populations have suffered tremendously as a result. *Services for migrants and refugees – including access to healthcare, economic assistance, and education – must be maintained in order to ensure vulnerable populations survive the ongoing difficulties associated with the pandemic.*