



NORTHERN
IRELAND
HUMAN
RIGHTS
COMMISSION

**Response to the Department of Finance
Consultation on the Review of Defamation Law
in NI**

31 January 2024

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Summary of Recommendations

- 2.9** The NIHRC recommends that the Department of Finance should ensure that defamation law in NI strikes a fair balance between freedom of expression and the right to private life, either by working with the NI Assembly to amend the Defamation Act (NI) 2022, or introducing additional safeguards to complement the Act.
- 3.5** The NIHRC recommends that the Department of Finance gives detailed consideration to an amendment to the Defamation Act (NI) 2022 to include a serious harm threshold akin to that which exists in defamation law in other UK jurisdictions which takes account of ECtHR jurisprudence.
- 4.5** The NIHRC recommends that the Department of Finance works with relevant bodies to ensure that relevant data on libel cases heard in NI is collected, accessibly published, monitored and evaluated, including cases resolved outside of court.
- 5.9** The NIHRC recommends that the Department of Finance works with the NI Executive and NI Assembly to introduce legislation to tackle strategic lawsuits against public participation in line with its obligations under international human rights law.
- 5.10** The NIHRC further recommends that the Department of Finance, as a matter of good practice, monitor any enhancement to human rights pursuant to the proposed EU directive on strategic lawsuits against public participation and, if adopted, ensure NI law aligns on a voluntary basis with such changes.
- 6.5** The NIHRC recommends that the Department of Finance considers all relevant options available to mitigate the costs and other

potential barriers to access to justice for all regarding defamation claims in NI.

1.0 Introduction

- 1.1 The Northern Ireland Human Rights Commission (the NIHRC), pursuant to section 69(1) of the Northern Ireland Act 1998, reviews the adequacy and effectiveness of law and practice relating to the protection of human rights in Northern Ireland (NI). The NIHRC is also mandated, under section 78A(1) of the Northern Ireland Act 1998, to monitor the implementation of Article 2 of the Windsor Framework, to ensure there is no diminution of rights protected in the “Rights, Safeguards and Equality of Opportunity” chapter of the Belfast (Good Friday) Agreement 1998 as a result of the UK’s withdrawal from the EU.¹ In accordance with these functions, the following statutory advice is submitted to the Department of Finance in response to its review of defamation law in NI.
- 1.2 The NIHRC bases its advice on the European Convention on Human Rights, which is incorporated into UK law by the Human Rights Act 1998. Other relevant treaty obligations of the Council of Europe (CoE) and United Nations (UN) are also considered. The relevant regional and international treaties in this context include:
- European Convention on Human Rights 1950 (ECHR);² and
 - UN Convention on Civil and Political Rights 1966 (UN ICCPR).³
- 1.3 In addition to these treaty standards, the following declarations and principles provide further guidance in respect of specific areas:
- UN Human Rights Committee General Comment No 16;⁴

¹ The Windsor Framework was formerly known as the Protocol on Ireland/Northern Ireland to the UK-EU Withdrawal Agreement and all references to the Protocol in this document have been updated to reflect this change. See Decision No 1/2023 of the Joint Committee established by the Agreement on the Withdrawal of the United Kingdom of Great Britain and Northern Ireland from the European Union and the European Atomic Energy Community of 24 March 2023 laying down arrangements relating to the Windsor Framework.

² Ratified by the UK 1951.

³ Ratified by the UK 1966.

⁴ ‘UN Human Rights Committee General Comment No 16: The Right to Respect of Privacy, Family, Home and Correspondence and Protection of Honour and Reputation’, 8 April 1988.

- UN Human Rights Committee General Comment No 32;⁵
- UN Human Rights Committee General Comment No 34;⁶
- CoE Committee of Legal Affairs and Human Rights Information Note on the Situation of Human Rights Defenders and Whistleblowers in Europe;⁷ and
- CoE Committee of Ministers Draft Recommendation on Countering the Use of Strategic Lawsuits Against Public Participation.⁸

1.4 The NIHRC welcomes the opportunity to respond to the Department of Finance’s consultation on the review of defamation law in NI. The NIHRC previously submitted a letter of evidence to the Committee for Finance on the proposed Defamation Bill, which welcomed the intent of the Bill to align NI defamation law with England and Wales.⁹ However, there is a disparity in the resulting Defamation Law (NI) Act 2022, which does not contain a serious harm test. This submission considers this omission and several other points.

2.0 General Comments

2.1 Defamation laws should strike an appropriate balance between the right to freedom of expression and the need to protect individual reputations under the right to private life.¹⁰

2.2 Article 8 of the ECHR provides that:

- 1) Everyone has the right to respect for his private and family life, his home and his correspondence.

⁵ CCPR/C/GC/32, ‘UN Human Rights Committee General Comment No 32: Right to Equality Before Courts and Tribunals and to a Fair Trial’, 23 August 2007.

⁶ CCPR/C/GC/34, ‘UN Human Rights Committee General Comment No 34: Freedoms of Opinion and Expression’, 12 September 2011.

⁷ CoE Committee on Legal Affairs and Human Rights, ‘Situation of Human Rights Defenders and Whistleblowers in Europe’, 18 October 2023.

⁸ MSI-SLP(2022)07, ‘CoE Draft Recommendation CM/Rec(20XX)XX of the Committee of Ministers to Member States on Countering the Use of Strategic Litigation Against Public Participation’.

⁹ Letter to the Committee for Finance from the NI Human Rights Commission, 18 November 2021.

¹⁰ *Mosely v the UK* (2011) ECHR 774, at para 111.

2) There shall be no interference by a public authority with the exercise of this right except such as is in accordance with the law and is necessary in a democratic society in the interests of national security, public safety or the economic well-being of the country, for the prevention of disorder or crime, for the protection of health or morals, or for the protection of the rights and freedoms of others.

2.3 The right to private life is also protected under Article 17 of the UN ICCPR. The UN Human Rights Committee has elaborated that:

Article 17 [of the UN ICCPR] affords protection to personal honour and reputation and States are under an obligation to provide adequate legislation to that end. Provision must also be made for everyone effectively to be able to protect himself against any unlawful attacks that do occur and to have an effective remedy against those responsible. States Parties should indicate in their reports to what extent the honour or reputation of individuals is protected by law and how this protection is achieved according to their legal system.¹¹

2.4 The right to freedom of expression is protected by Article 10 of the ECHR. Article 10(1) of the ECHR states that "everyone has the right to freedom of expression. This right shall include freedom to hold opinions and to receive and impart information and ideas without interference by public authority and regardless of frontiers". As a qualified right, Article 10(2) of ECHR clarifies that:

the exercise of these freedoms, since it carries with it duties and responsibilities, may be subject to such formalities, conditions, restrictions or penalties as are prescribed by law and are necessary in a democratic society ... for the protection of the reputation or rights of others.

¹¹ 'UN Human Rights Committee General Comment No 16: The Right to Respect of Privacy, Family, Home and Correspondence and Protection of Honour and Reputation', 8 April' 1988, at para 11.

2.5 Furthermore, in the context of defamation, there must be a balance between Articles 8 and 10 of the ECHR. In *Axel Springer v Germany* (2012), the ECtHR identified that in this context, “in order for Article 8 [of the ECHR] to come into play, however, an attack on a person’s reputation must attain a certain level of seriousness and in a manner causing prejudice to personal enjoyment of the right to respect for private life”.¹²

2.6 Article 19 of the ICCPR also provides for the right to freedom of expression. The UN Human Rights Committee’s advises that “defamation laws must be crafted with care to ensure that they comply with... [Article 19(3) of the UN ICCPR], and that they do not serve, in practice, to stifle freedom of expression”.¹³ Additionally, the UN Human Rights Committee notes that:

it is impermissible for a State Party to indict a person for criminal defamation but then not to proceed to trial expeditiously – such a practice has a chilling effect that may unduly restrict the exercise of freedom of expression of the person concerned and others.¹⁴

2.7 In 2008, at a time when defamation laws across the UK were directly comparable, the UN Human Rights Committee found that UK defamation laws were “unduly restrictive”, noting the potential chilling effect on freedom of expression regarding matters of public interest.¹⁵ While the Defamation Act 2013 for England and Wales and the Defamation Act (NI) 2022 have since being introduced, there are fundamental differences across the two pieces of legislation. Consequently, there is a concern that

¹² *Axel Springer AG v Germany* (2012) ECHR 227 2012, at para 83 and 84. See also *Karakó v Hungary* (2009) ECHR 712, at para 23.

¹³ CCPR/C/GC/34, ‘UN HRC Committee General Comment No 34: Article 19: Freedoms of Opinion and Expression’, 12 September 2011, at para 47.

¹⁴ *Ibid.*

¹⁵ CCPR/C/GBR/CO/6 ‘Concluding Observations of the UN Human Rights Committee on Sixth Periodic Report Submitted by the UK’, 30 July 2008.

the differences in approach hinder the ability to appropriately regulate freedom of expression with parity across the UK.¹⁶

- 2.8 Furthermore, it is a concern that defamation law in NI still favours the plaintiff, and in doing so, may not strike a balance between freedom of expression and respect for private life.¹⁷ This could discourage publishers from participating in NI.¹⁸ The NIHRC reiterates its earlier assessment that having similar defamation law enables NI to be assisted by jurisprudence emerging from England and Wales, which sees more defamation actions than in NI.¹⁹
- 2.9 **The NIHRC recommends that the Department of Finance should ensure that defamation law in NI strikes a fair balance between freedom of expression and the right to private life, either by working with the NI Assembly to amend the Defamation Act (NI) 2022, or introducing additional safeguards to complement the Act.**

3.0 Serious Harm Threshold

- 3.1 Reflecting the NIHRC's original advice on this issue,²⁰ it is disappointing that a proposed clause that would have inserted a 'no serious harm' threshold into the 2022 Act was not retained. Clause 1 of the then Defamation Bill, as introduced to the NI Assembly, proposed to directly insert the serious harm test found in the Defamation Act 2013. It stated that:

¹⁶ Letter to the Committee for Finance from the NI Human Rights Commission, 18 November 2021; See also: NI Human Rights Commission, 'Submission to Committee for Finance: Defamation' (NIHRC, 2013), at 5.

¹⁷ Andrew Scott, 'Reform of Defamation Law in NI' (LSE, 2016), at para 2.02; NI Assembly Hansard, 'Committee for Finance: Report on the Committee Stage of the Defamation Bill – NIA 161/17-22', 26 January 2022.

¹⁸ Andrew Scott, 'Reform of Defamation Law in NI' (LSE, 2016), at para 2.03.

¹⁹ Letter to the Committee for Finance from the NI Human Rights Commission, 18 November 2021.

²⁰ Ibid.

1) A statement is not defamatory unless its publication has caused or is likely to cause serious harm to the reputation of the claimant.

2) For the purposes of this section, harm to the reputation of a body that trades for profit is not “serious harm” unless it has caused or is likely to cause the body serious financial loss.²¹

3.2 If retained, the originally proposed provision would have reflected jurisprudence on the question of what is sufficient to establish that a statement is defamatory.²² For example, in *Axel Springer v Germany*, the ECHR established that in order for Article 8 of the ECHR to be engaged, the alleged defamation must attain a certain level of seriousness.²³ In *Thornton v Telegraph Media Group Ltd* (2010), the High Court of England and Wales noted in regard to defamation that “there must be some tendency or likelihood of adverse consequences for the claimant”.²⁴

3.3 Furthermore, in *Lachaux v Independent Print Ltd and Anor* (2019) the interpretation of the serious harm test in Section 1 of the Defamation Act 2013 was specifically considered. In this case, the claimant submitted that Section 1 of the 2023 Act introduced an additional condition for a statement to be regarded as defamatory, which is that it “must also be shown to produce serious harm in fact”.²⁵ The UK Supreme Court found that reputational harm can be proven by inferences from the circumstances and context of the defamatory publication.²⁶

3.4 The serious harm test in the Defamation Act 2013 has not been without its issues, namely whether it offers a better framework than was already

²¹ Section 1, Defamation Act 2013.

²² Department of Finance, ‘The Defamation Bill: Explanatory and Financial Memorandum’ (DoF, 2022).

²³ *Axel Springer AG v Germany* (2012) ECHR 227 2012, at para 83 and 84. See also *Karakó v Hungary* (2009) ECHR 712, at para 23.

²⁴ *Thornton v Telegraph Media Group Ltd* [2010] EWHC 1414, at para 51.

²⁵ *Lachaux v Independent Print Ltd and Anor* [2019] UKSC 27, at para 11.

²⁶ *Ibid.*

developed under common law.²⁷ However, there are several potential benefits in the context of NI's defamation laws, including ensuring that appropriate resources are available for the most serious cases and encouraging prompt and efficacious corrections or retractions of erroneous statements.²⁸

- 3.5 **The NIHRC recommends that the Department of Finance gives detailed consideration to an amendment to the Defamation Act (NI) 2022 to include a serious harm threshold akin to that which exists in defamation law in other UK jurisdictions which takes account of ECtHR jurisprudence.**

4.0 Libel Tourism

- 4.1 In 2008, the UN Human Rights Committee noted that the UK's practical application of defamation law has "served to discourage critical media reporting on matters of serious public interest, adversely affecting the ability of scholars and journalists to publish their work, including through the phenomenon known as 'libel tourism'".²⁹
- 4.2 Libel tourism refers to claimants bringing a claim in a particular jurisdiction, not because it is the most appropriate jurisdiction to hear the case, but because it is believed that defamation law will give them the best chance of a favourable outcome.³⁰
- 4.3 The CoE Committee of Ministers has identified that libel tourism is a growing concern, noting that "given the wide variety of defamation standards, court practices, freedom of speech standards and a readiness of

²⁷ Andrew Scott, 'Reform of Defamation Law in NI' (LSE, 2016).

²⁸ Ibid.

²⁹ CCPR/C/GBR/CO/6 'Concluding Observations of the Human Rights Committee on the Sixth Periodic Report Submitted by the UK', 30 July 2008.

³⁰ Department of Finance, 'Review of Defamation Law in NI' (DoF, 2023), at 10.

courts to accept jurisdiction in libel cases, it is often impossible to predict where a defamation/libel claim will be filed".³¹

- 4.4 Section 7 of the 2022 Act, which ends the presumption of jury trials in defamation cases, aims to minimise the perceived risk of libel tourism in NI.³² It is also reported that there is no evidence of any increase in defamation cases in NI as a result of diverging legislation from the rest of the UK since 2013.³³ However, the possibility remains that in the future certain cases may be brought to NI from individuals or organisations domiciled in the UK attempting to benefit from the perception of a potentially more favourable outcome in NI courts.
- 4.5 **The NIHRC recommends that the Department of Finance works with relevant bodies to ensure that relevant data on libel cases heard in NI is collected, accessibly published, monitored and evaluated, including cases resolved outside of court’.**

5.0 Strategic Lawsuits Against Public Participation

- 5.1 Strategic lawsuits against public participation are recognised as actions, including defamation actions, taken primarily to embroil the defendant in costly and prolonged legal proceedings with the view to deterring them from researching or reporting on a matter of public interest.³⁴
- 5.2 The former UN Special Rapporteur on Freedom of Peaceful Assembly and of Association, Annalisa Ciampi, identified that such strategic litigation has seen a significant increase worldwide, and certain legal frameworks

³¹ CoE Committee of Ministers, 'The Desirability of International Standards Dealing with Forum Shopping in Respect of Defamation, "Libel Tourism", to Ensure Freedom of Expression', 4 July 2012.

³² Department of Finance, 'Review of Defamation Law in NI' (DoF, 2023), at 10.

³³ Ibid.

³⁴ Ibid, at 11.

provide “fertile ground”.³⁵ This fertile environment can include how expensive legal costs are, the “elasticity” of laws targeting speech, especially defamation and the absence of safeguards, including preventative legislation or discretionary cost awards for abuse of processes.³⁶ The UN Special Rapporteur recommended that all States “should protect and facilitate the rights to freedom of expression, assembly and association to ensure that these rights are enjoyed by everyone by, inter alia, enacting anti-strategic lawsuits against public participation legislation, allowing an early dismissal (with an award of costs) of such suits and the use of measures to penalise abuse”.³⁷

5.3 The CoE Committee on Legal Affairs and Human Rights noted that the widespread use of strategic lawsuits against public participation continues to involve abusive litigation to prevent dissemination of information and to silence those reporting on issues in the public interest.³⁸ The CoE Committee noted that strategic lawsuits against public participation continue to be used extensively against journalists and media organisations, human rights activists and civil society organisations, trade unions and whistleblowers.³⁹ The CoE Committee further highlight that the CoE are considering a draft recommendation on the issue of strategic lawsuits against public participation.⁴⁰

5.4 Though in draft form, the proposed CoE recommendation on countering strategic lawsuits against public participation currently states that:

asymmetries in political, financial and other forms of power in society can give rise to inequalities in public debate and that the misuse and abuse of power and privilege by threatening or taking

³⁵ UN Human Rights Office of the High Commissioner, ‘UN Special Rapporteur on the Rights to Freedom of Peaceful Assembly and of Association Information, Annalisa Ciampi: Note on Strategic Litigation Against Public Participation and Freedom of Peaceful Assembly and Association Rights’ (UNHRC, Unknown).

³⁶ Ibid.

³⁷ Ibid.

³⁸ CoE Committee on Legal Affairs and Human Rights, ‘Situation of Human Rights Defenders and Whistleblowers in Europe’, 18 October 2023.

³⁹ CoE Committee on Legal Affairs and Human Rights, ‘Situation of Human Rights Defenders and Whistleblowers in Ibid.

⁴⁰ Ibid.

legal action to harass, intimidate, or silence minority or critical voices creates a chilling effect on public participation.⁴¹

- 5.5 It also proposes that, for the purposes of the draft recommendation, strategic lawsuits against public participation are understood as:

legal actions that are initiated or pursued as a means of harassing or intimidating their target, with the strategic aim of preventing or hindering public participation. More specifically, strategic lawsuits against public participation are legal claims, proceedings and other actions brought in relation to public participation and expression on matters of public interest that have as their main purpose to prevent, restrict or penalise the exercise of rights associated with public participation.⁴²

- 5.6 In November 2023, the European Commission welcomed political agreement between the EU Parliament and the Council on a new EU Directive to protect individuals and organisations targeted by strategic lawsuits against public participation.⁴³ The proposed EU Directive aims to strengthen media pluralism in the EU and protect human rights defenders.⁴⁴ It is important to note that since the UK has exited the EU, the proposed EU Directive's protections will not extend to NI. Under Article 2 of the Windsor Framework, the UK Government has committed to ensure there is no diminution of rights, safeguards and equality of opportunity, as set out in the Belfast (Good Friday) Agreement 1998, as a result of the UK's withdrawal from the EU. In addition, in accordance with Article 13(3) of the Windsor Framework, NI law must keep pace with any changes by the EU to the six EU Equality Directives in Annex 1 of the Framework.

⁴¹ MSI-SLP(2022)07, 'CoE Draft Recommendation CM/Rec(20XX)XX of the Committee of Ministers to Member States on Countering the Use of Strategic Litigation Against Public Participation', Pending.

⁴² Ibid.

⁴³ European Commission, 'Press Release: Commission welcomes political agreement on countering abusive lawsuits against public participation (SLAPPs)', 30 November 2023.

⁴⁴ COM(2022) 177 'Proposal for a Directive of the European Parliament and of the Council on Protecting Persons who Engage in public participation from Manifestly Unfounded or Abusive Court Proceedings ("Strategic Lawsuits against Public Participation")', 27 April 2022.

- 5.7 NI is in the unique position in the UK of sharing a land border with Ireland, an EU member state. In light of the potential for divergence of rights on the island of Ireland, the NIHRC takes the view that the NI Assembly, as a matter of best practice, can choose to voluntarily align with EU developments, even where it is not required to do so under the Windsor Framework, to strengthen protections and to ensure equivalence of rights on the island.⁴⁵
- 5.8 There is currently no anti-strategic lawsuits against public participation legislation in place in any jurisdiction of the UK and there is no agreement upon a statutory definition of strategic lawsuits against public participation.⁴⁶
- 5.9 **The NIHRC recommends that the Department of Finance works with the NI Executive and NI Assembly to introduce legislation to tackle strategic lawsuits against public participation in line with its obligations under international human rights law.**
- 5.10 **The NIHRC further recommends that the Department of Finance, as a matter of good practice, monitor any enhancement to human rights pursuant to the proposed EU directive on strategic lawsuits against public participation and, if adopted, ensure NI law aligns on a voluntary basis with such changes.**

6.0 Access to Justice

- 6.1 Costs associated with taking legal cases regarding defamation claims to court can act as a barrier to accessing justice for individuals and organisations without the fiscal means to go to court, as they do for other

⁴⁵ Equality Commission for NI, NI Human Rights Commission and Irish Human Rights and Equality Commission, 'Policy Recommendations: European Union developments in Equality and Human Rights: The Impact of Brexit on the divergence of rights and best practice on the island of Ireland', (ECNI, NIHRC and IHREC, 2023).

⁴⁶ UK Government, 'Factsheet: Strategic Lawsuits Against Public Participation (SLAPPs)'. Available at: [Factsheet: strategic lawsuits against public participation \(SLAPPs\) - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/factsheets/strategic-lawsuits-against-public-participation-slapps)

legal actions.⁴⁷ This is particularly concerning given the current and ongoing cost of living crisis.⁴⁸ There are options to address issues with access to justice arising from costs associated with defamation claims, including making these actions eligible for legal aid and incentivising parties to engage in options costing less than a full legal process.⁴⁹

6.2 Adopting an approach that enables access to justice in defamation cases is required by international human rights law. For example, Article 6 of the ECHR provides for the right to a fair trial and access to justice. This provision does not obligate States to provide free legal representation for every dispute.⁵⁰ However, it is intended to safeguard rights so that their enjoyment is practical and effective, in particular the right of access to courts. For example, the ECtHR has held that Article 6 of the ECHR may compel States to provide for the assistance of a lawyer in civil proceedings when such assistance proves indispensable for an effective access to court.⁵¹

6.3 Article 14(1) of the ICCPR also provides for the right to equality before the law. The UN Human Rights Committee, has elaborated that “the right to equality before the courts and tribunals and to a fair trial is a key element of human rights protection and serves as a procedural means to safeguard the rule of law”.⁵² Furthermore, that:

the availability or absence of legal assistance often determines whether or not a person can access the relevant proceedings or participate in them in a meaningful way. While Article 14 [of the UN ICCPR] explicitly

⁴⁷ Department of Finance, ‘Review of Defamation Law in NI’ (DoF, 2023), at 12; Letter from the NI Human Rights Commission to the Committee for Finance, 18 November 2021; Andrew Scott, ‘Reform of Defamation Law in NI’ (LSE, 2016).

⁴⁸ The Law Society, ‘Press Release: Cost of living crisis could drive a wedge into justice gap’, 31 May 2022.

⁴⁹ Andrew Scott, ‘Reform of Defamation Law in NI’ (LSE, 2016); Department of Finance, ‘Review of Defamation Law in NI’ (DoF, 2023).

⁵⁰ *Airey v Ireland* (1979) ECHR 3, at para 26.

⁵¹ *Ibid.*

⁵² CCPR/C/GC/32, ‘UN Human Rights Committee General Comment No 32: Right to Equality Before Courts and Tribunals and to a Fair Trial’, 23 August 2007.

addresses the guarantee of legal assistance in criminal proceedings in... [Article 14(3)(d) of the UN ICCPR] States are encouraged to provide free legal aid in other cases, for individuals who do not have sufficient means to pay for it.⁵³

- 6.4 How the balance is struck between access to justice, the financial cost involved and the effective operation of a legal system falls within the margin of appreciation that the ECHR allows States.⁵⁴ In this context, the ECtHR must be satisfied that the limitations applied by a State exercising its margin of appreciation do not restrict or reduce access to justice to such an extent that the essence of Article 6 of the ECHR is impaired.⁵⁵ The ECtHR has noted that “a limitation will not be compatible with Article 6 [of the ECHR] if it does not pursue a legitimate aim and if there is not a reasonable relationship of proportionality between the means employed and the aim sought to be achieved”.⁵⁶
- 6.5 **The NIHRC recommends that the Department of Finance considers all relevant options available to mitigate the costs and other potential barriers to access to justice for all regarding defamation claims in NI.**

⁵³ Ibid.

⁵⁴ *Staroszczyk v Poland* (2007) ECHR 222, at para 124.

⁵⁵ Ibid.

⁵⁶ Ibid.

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