

Applying the UN Human Rights Due Diligence Policy in Peacebuilding

A Snapshot of Practice from the 2024 Peacebuilding Fund Thematic Review

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This policy brief draws from the 2024 Peacebuilding Fund (PBF) Thematic Review, which focused on synergies between human rights and peacebuilding in PBF-supported programming.¹ One of the research questions within the Review was to explore how the Due Diligence Policy on United Nations (UN) support to non-UN security forces (commonly abbreviated as HRDDP) was being applied across the 92 projects within the Review sample. This policy brief summarizes those findings, and the Review's policy recommendations as they relate to HRDDP. To provide further background, this policy brief also incorporates additional research conducted for the Review.

The Peacebuilding Fund

The PBF was established in 2006 by the Secretary-General at the request of the General Assembly as the primary financial instrument of the UN to sustain peace in countries at risk of or affected by violent conflict. The PBF provides funds to UN entities, governments, regional organizations, multilateral banks, national multi-donor trust funds, and civil society organizations. From 2006 to 2023, the PBF allocated nearly \$2 billion to 72 recipient countries.

Since 2006, the Peacebuilding Support Office (PBSO) has commissioned Thematic Reviews to examine past practices and promising innovations in peacebuilding, and to reflect on the performance of the PBF in designated areas. The Review that this policy brief was part of was commissioned by PBSO in partnership with Office of the High Commission for Human Rights (OHCHR) and the Government of Switzerland. Research was led by United Nations University Centre for Policy Research (UNU-CPR), and conducted between January and October 2023. Field research was conducted in Colombia in February 2024. Full methodology details are provided in the full Thematic Review.

The HRDDP is a system-wide policy setting out measures that UN entities must take to ensure that support provided to non-UN security forces is consistent with the UN Charter and its obligations to promote and encourage respect for human rights.² Although the policy originally emerged within peacekeeping missions as a result of their regular engagement with non-UN security forces as partners, HRDDP has been applied to all UN entities providing support to non-UN security forces since its inception, including within peacebuilding work.³ In 2015, the HRDDP Review Group published a system-wide guidance note on implementing the policy; since then, there have been increasing efforts to institutionalize and actualize HRDDP.⁴ Examining whether and how HRDDP has been applied within the PBF-supported programming in the 2024 Thematic Review sample offers one data point on how HRDDP is being taken up and applied within the peacebuilding field.

Background on HRDDP Policy and Practice

First instituted in 2011, HRDDP provides a set of guidelines to help ensure that such support is compliant with, and promotes respect for, international human rights

The full Thematic Review is available at: <https://unu.edu/cpr/report/2024-pbf-thematic-review-synergies-between-human-rights-and-peacebuilding-pbf-supported>.

and humanitarian laws.⁵ Common steps for applying HRDDP include conducting a risk assessment to evaluate potential human rights risks and developing appropriate risk mitigation measures. As part of continuing mitigation measures, HRDDP requires continued monitoring of the recipient forces' conduct and some form of intervention or response if grave violations are committed.⁶ The policy provides a "limited number of exceptions... [to] be interpreted restrictively", notably in the areas of "training or sensitization" and "standard-setting" on international law, for example training on human rights standards.⁷

While the policy has been in place for over a decade, its origin within peacekeeping missions has resulted in a lag in implementation in the peacebuilding field, according to experts interviewed.⁸ Much of the institutional knowledge in applying HRDDP lies within individual peacekeeping missions and has not yet been fully absorbed in the institutional policies and guidance of UN entities more involved in peacebuilding work. Under the policy UN entities are required to develop an individualized implementation framework for HRDDP, including "general operational guidance," but there are varying levels of formality and guidance across agencies working in the peacebuilding space.⁹ The United Nations Development Programme (UNDP), which was involved in 61 per cent of the projects in this study, has a global system to ensure that programming that might trigger HRDDP goes through a risk assessment process, appropriate to the level of risk and the stipulations of the HRDDP guidance.¹⁰ However, other UN entities that were involved in many of the Review projects, such as the United Nations Office on Drugs and Crime (UNODC) and the International Office of Migration (IOM) are currently undergoing reviews of their internal policies, and some do not have formal internal procedures for HRDDP in place (e.g. UN Women).¹¹

Global observations that there has been an uneven uptake of HRDDP in the peacebuilding field writ large¹² was also evidenced in the Thematic Review analysis. Of the 92 projects, 28 (30 per cent) had at least some component or activity that involved working with non-UN security forces, and for which the HRDDP may have been applicable.¹³ However, 12 of these projects appeared to relate to an exception: the only support identified was providing the security forces in question with training on international law (often human rights training).¹⁴ This still leaves 16 projects for which the HRDDP likely should have been applied.¹⁵ Of these, HRDDP had only clearly been applied in four of them.¹⁶

In interviews about HRDDP consideration and application some implementing partners appeared to be confused about the nature of the exceptions, and assumed that HRDDP did not apply to certain areas of work, even when it likely did. Some implementing partners who traditionally worked in the humanitarian space appeared to assume that there might be a humanitarian exception – i.e., that the HRDDP would not apply when provision of medical or humanitarian supplies was the only assistance in question.¹⁷ There was a lack of clarity over the exact scope of what could be considered security forces, with some interviewed assuming that those working in prisons or other specialized forms of police might not constitute security forces.¹⁸ In addition, although there is an exception for training on international law, implementing partners were not always clear whether other forms of training related to peace education or related peacebuilding themes might also constitute an exemption.

One challenge in trying to verify whether HRDDP had been applied is that peacebuilding organizations do not always document how HRDDP is taken into consideration. The UN entities involved in these projects may well have taken HRDDP into consideration – either deeming it inapplicable or applying it to some degree – but may not have documented how they did so. Even where the project documents or reporting identified that HRDDP had been applied, there were often scant details on how HRDDP was considered, what risks were identified, any risk mitigation measures adopted, or how these were followed throughout the lifecycle of the programme. This lack of follow-on documentation and integration within the project monitoring and reporting itself contributes to a gap in understanding and uptake, as it makes it impossible for the peacebuilding community as a whole to develop a sense of the scope of the practice, and appropriate measures to take.

HRDDP in the DRC Case Study

One of the three case studies in the Thematic Review centred on a sample of four PBF-supported projects in the Democratic Republic of the Congo (the DRC), a context in which security sector abuses and human rights risks have been rife.¹⁹ Given a more substantial history of application of HRDDP in the DRC, examining HRDDP in these four projects provides an important example of both how far application of HRDDP has come in some respects, but also some of the gaps that still exist in the peacebuilding field.

The United Nations Organization Stabilization Mission in the Democratic Republic of the Congo (MONUSCO) has served as a pioneering UN mission on HRDDP. As a result, the application of HRDDP is perhaps more advanced in the DRC than in any other country. The mission has a dedicated HRDDP unit which has allocated significant resources to developing national-level understanding of the importance of human rights due diligence processes. Clear standard operating procedures have been put in place by the UN Country Team. The necessary databases and processes have been developed to allow MONUSCO to conduct detailed risk assessments and vetting before pursuing programming of any kind that directly or indirectly provides support to security forces. In fact, MONUSCO is considering extending HRDDP's application beyond programming with a security sector focus to be included as part of the decision-making process for all support to government actors. This goes beyond current HRDDP policy parameters, and remained an open debate as of the time of research.

Three of the projects in the DRC case study included activities related to non-UN security forces. In one project that spanned Kasai-Central, Kasai and Tanganyika Provinces, [PBF/COD/B-7](#), HRDDP was clearly applied – in a way that is more proactive and goes beyond traditional HRDDP application. HRDDP is generally understood to apply to the official forces of a State. However, in this project, which involved ex-combatant returnees as one of its key beneficiary groups, a database was set up to screen ex-combatants of all past backgrounds, potentially including those who had fought as both government security forces and other unofficial, informal, or non-governmental forces. Screenings of ex-combatants were carried out by the HRDDP unit (in coordination with IOM), which resulted in the exclusion of several ex-combatants who had committed human rights abuses.

The use of screening databases to track security actors, and to help assess the risk of human rights violations was a practice that had already been established within the mission.²⁰ HRDDP practice in other countries (outside of mission settings) has often not been this proactive or institutionalized. Still, even within the DRC, interviewees said that in the past such databases have only tracked formal security sector actors. This project thus offers an example of a robust form of HRDDP application. The fact that some ex-combatants who had been involved in human rights abuses were excluded suggests that improving the collection of information on members of armed groups could be important

in the future application of HRDDP in similar contexts.

HRDDP consideration and application was less clear for two other projects within the DRC case study: [PBF/COD/C-1](#) (a project in the Kasai region focused on transitional justice, reconciliation and support to government institutions) and [PBF/IRF-317](#) (a project in South Kivu related to women's empowerment in mining communities). These projects involved some subactivities related to engaging with non-UN security forces (police in the Kasai region in the [PBF/COD/C-1](#) project, and mining police in [PBF/IRF-317](#)). In both projects the nature of this engagement was mostly raising awareness on rights and reporting practices. Given this, these may have constituted training on international law and thus have fallen under HRDDP exceptions.²¹ This was difficult to conclusively determine given a lack of details on whether and how HRDDP had been taken into consideration. For the project related to mining police, [PBF/IRF-317](#), the IOM staff interviewed indicated that some HRDDP sensitization efforts were carried out but were unable to provide further details.²² In the older (2018–2021) PAJURR project, [PBF/COD/C-1](#), those interviewed either did not know whether HRDDP had been applied or said they assumed it had been at an early implementation stage.²³

While the available information makes it difficult to make any determinative judgments, the lack of clarity on these two projects illustrates some of the challenges noted above. As noted, one of the obstacles to seeing broader HRDDP application in the peacebuilding field is lingering uncertainty about whether certain types of training fall under the exception to HRDDP, and also whether certain types of security forces fell under its remit. As also noted, even where HRDDP has been taken into consideration, the lack of systematic application and reporting on these issues can make it difficult to trace back how it has been applied, or whether it was deemed inapplicable. It is particularly notable that these issues surfaced even in an environment like the DRC, where there is a high level of awareness of HRDDP and established processes and capacities for supporting it.

What these examples suggest is that despite the mainstreaming of HRDDP at mission level in the DRC, the policy and its requirements are less well metabolized by staff at some UN entities and at the implementation level.²⁴ While the projects examined by this case study included only minor components involving security actors, implementers and even senior UN staff struggled to clearly articulate the HRDDP considerations involved. Most agencies involved

assumed that HRDDP had been applied to the programme at an early implementation stage, if at all, but demonstrated no particular knowledge of vetting processes or how they had been applied.

Going forward, there appeared to be a need to build HRDDP considerations more systematically into the implementation of peacebuilding work in the DRC, including that supported by the PBF. This is particularly important given MONUSCO's transition, since much of the understanding of HRDDP lies within the mission, so there is a risk of some of the institutional support to HRDDP being lost with the mission's closure.

UN staff in the DRC suggested that PBSO could contribute to the improved application of HRDDP (in the DRC and other locales) through provision of guidance on HRDDP and/or by ensuring that there are specific inquiries during the project proposal and early implementation phases. Doing so might strengthen agency buy-in on the policy and ensure that HRDDP considerations are fully integrated in the project design and implementation strategy. Several interviewees also suggested making sure that implementing partners have the resources needed to develop and apply HRDDP fully, including contact with human rights focal points who have capacity to advise on HRDDP and/or financial resources to allow them to carry out a risk assessment or other supporting tasks. While some of this might come from the investment of UN entities themselves, one direct way that PBSO might facilitate this in its work is to allow resourcing for HRDDP-related tasks to be explicitly included in the project budget. On this, there has already been some recent progress – PBSO staff who work on these issues globally (i.e. not specifically in the DRC) said that this had not been standard in the past but has been included in recent proposals and is something they are more actively supporting.²⁵

Going forward, HRDDP requires an improved and more systematic inclusion in programme implementation in the DRC. This is particularly important within the context of the gradual transition to a non-mission setting given that much of the knowledge and understanding of HRDDP currently lies within the mission. For better implementation of HRDDP, UN agency staff in the DRC highlighted the need to build HRDDP into projects from the start, strengthen agency buy-in on the policy, ensure adequate financial capacities are in place, and devote collective efforts to promote the policy through continuous engagement with relevant actors on its implementation.

Conclusions

HRDDP is an important UN standard, not only ensuring compliance with international law and adherence to the principles of the UN Charter but also providing a framework to strengthen the integration of human rights and peacebuilding. HRDDP ensures that aid is not inadvertently provided to units who may go on to commit human rights violations and in doing so, undermine long-term peacebuilding objectives. In this way, HRDDP is both a human rights and a conflict prevention tool.²⁶ With this additional evidence of a lag in HRDDP uptake, UN entities engaged in areas of peacebuilding that frequently interact with the security sector would benefit from adopting more systematic policies and processes on HRDDP, such that HRDDP consideration is regularly triggered where appropriate.

Although application of UN institutional standards such as HRDDP primarily rest with the UN entity in question, given the Review's focus on providing recommendations for the PBF and for PBSO, specific attention was given to strengthening HRDDP application within PBF-supported programming. PBSO organized a PBF Community of Practice session on HRDDP in December 2022, and also shared the guidance from that session with PBF Secretariats and other field presences. Nonetheless, some suggested that PBSO provide further guidance on HRDDP to encourage uptake. Others observed that there are already so many different forms of guidance that the message could be easily lost, and instead emphasized asking questions about HRDDP during the application phase, and/or in any follow-on monitoring. Relatedly, some suggested integrating HRDDP as part of the questions within the "Risk management" section of the project document, to encourage due attention.²⁷

In addition, some staff suggested thinking about the questions and framework within HRDDP as a way to guide project review and oversight, even for those projects not directly related to non-UN security forces. Experts working on HRDDP stressed that HRDDP should not be a "tick the box" technical exercise.²⁸ It can be a tool for identifying the human rights risks implicit in a project and a way to think through risk mitigation steps in project design.

PBSO staff observed that they already do ask for follow-ups from implementing partners at the proposal or implementation stage about risk factors and analysis, including

HRDDP. However, they noted that when they do so, they do not always get clear answers about how HRDDP has been applied.²⁹ This further underlines the lack of full absorption within the peacebuilding field, but also the issue of under-documentation of any HRDDP consideration that does happen.

Several interviewees also suggested making sure that implementing partners have the resources needed to develop and apply HRDDP fully, including contact with human rights focal points who have capacity to advise on HRDDP and/or financial resources to allow them to carry out a risk assessment or other supporting tasks. Some of those interviewed in the DRC specifically suggested that allowing resourcing for HRDDP-related tasks to be explicitly included in the project budget would improve implementation. On this, there has already been some recent progress – PBSO staff who work on these issues globally said that this had not been standard in the past but has been included in recent proposals and is something they are more actively supporting.³⁰

Concerns about insufficient consideration of HRDDP also relate to a larger issue highlighted in the Thematic Review – that of the need to ensure sufficient human rights capacity and expertise in the system as a whole, at both a country and a headquarters level. For implementing partners working in peacebuilding areas that relate to the security sector, additional investments in internal expertise and resources to support HRDDP analysis and application, as well as tracking of

what HRDDP response measures have been taken in any given project, would help overcome unevenness in implementation.

Summary recommendations:

- There is still an overall need for socializing and supporting the application of HRDDP within the peacebuilding field, given evidence of a lag in uptake.
- To support more robust implementation, UN entities engaged in this work should consider whether there are sufficient processes, guidance, and resources in place to ensure systematic application of HRDDP in all appropriate areas of work.
- While primary responsibility for implementation lies with the UN entity involved, PBSO could encourage more robust implementation by providing guidance on HRDDP.
- PBSO might also consider more systematically incorporating review of HRDDP considerations within the project review and monitoring strategy, for example, regularly including HRDDP within the risk management questions and queries that are part of project document development; and encouraging partners to record any HRDDP consideration or application in the monitoring and evaluation strategy.
- PBSO and other interested donors should continue the recent practice of considering funding for HRDDP review and analysis within the budget of PBF-supported projects, as appropriate.

Additional Sources on HRDDP include:

- Adam Day and Charles T. Hunt, *Protecting Together: Lessons from Mali and South Sudan on Coherence Between Human Rights and Military Components in UN Peace Operations* (New York: United Nations University, 2021). Available at: http://collections.unu.edu/eserv/UNU:8263/UNU_ProtectingTogether.pdf.
- Daniel Levine-Spound, *Enabling Support by Mitigating Risk, MONUSCO's Implementation of the Human Rights Due Diligence Policy in the Democratic Republic of the Congo* (Washington, DC: Center for Civilians in Conflict (CIVIC), 2020). Available at: https://civiliansinconflict.org/wp-content/uploads/2020/06/CIVIC_HRDDP_Report_Final-Web-1.pdf.
- United Nations Department of Peace Operations, *The Protection of Civilians in United Nations Peacekeeping Handbook* (United Nations, 2020). Available at: https://peacekeeping.un.org/sites/default/files/dpo_poc_handbook_final_as_printed.pdf.
- United Nations High Commissioner for Human Rights (OHCHR), *Going Further Together: The contribution of human rights components to the implementation of mandates of United Nations field missions* (United Nations, 2020). Available at: https://www.ohchr.org/sites/default/files/Documents/Press/WebStories/Going_Further_Together_advance_unedited_version.pdf, (pp 9).
- United Nations, *Human Rights Due Diligence Policy on United Nations Support to Non-United Nations Security Forces, Guidance Note and text of the Policy* (United Nations, 2015). Available at: <https://unsdg.un.org/sites/default/files/Inter-Agency-HRDDP-Guidance-Note-2015.pdf>.

Endnotes

- 1 Erica Gaston, Fiona Mangan, Cristal Downing, Raphael Bodewig, Lauren McGowan, Emma Bapt, and Adam Day, *2024 PBF Thematic Review: Synergies between Human Rights and Peacebuilding in PBF-supported Programming* (New York: United Nations University, 2024). Available at: https://collections.unu.edu/eserv/UNU:9658/thematic_review_human_rights_peacebuilding.pdf.
- 2 For the full definition and other policy guidance, see identical letters dated 25 February 2013 from the Secretary-General addressed to the President of the General Assembly and to the President of the Security Council, [A/67/775-S/2013/110](https://www.un.org/News/Press/docs/2013/1302_SG25EB2013.en.pdf).
- 3 United Nations, *Human Rights Due Diligence Policy on United Nations Support to Non-United Nations Security Forces, Guidance Note and text of the Policy* (United Nations, 2015). Available at: <https://unsdg.un.org/sites/default/files/Inter-Agency-HRDDP-Guidance-Note-2015.pdf>.
- 4 Ibid.
- 5 UN Security Council and UN General Assembly, *A/67/775-S/2013/110*, 5 March 2013. Available at: https://www.ohchr.org/sites/default/files/Documents/HRBodies/SP/AMeetings/20thsession/IdenticalLetterSG25Feb2013_en.pdf.
- 6 Ibid., p. 11.
- 7 See the guidance note for information on what does not qualify as "support": United Nations, *Human Rights Due Diligence Policy on United Nations Support to Non-United Nations Security Forces, Guidance Note and Text of the Policy* (United Nations, 2025). Available at: <https://unsdg.un.org/sites/default/files/Inter-Agency-HRDDP-Guidance-Note-2015.pdf>, pp. 8–9, 44.
- 8 Interview with two OHCHR officials, Geneva, 10 January 2023 (Interview #4); interview with UN official, MS Teams, 9 May 2023 (Interview #47). See also OHCHR, *Going Further Together: The Contribution of Human Rights Components to the Implementation of Mandates of United Nations Field Missions* (United Nations, 2020), p. 30. Available at: https://www.ohchr.org/sites/default/files/Documents/Press/WebStories/Going_Further_Together_advance_unedited_version.pdf.
- 9 HRDDP Guidance Note. This was reiterated in January 2019 by the Secretary-General's Executive Committee. See, for example, an explanation of this decision on the website of the UN Office for Drugs and Crime (UNODC): UNODC, "Human Rights Due Diligence Policy," last accessed on 28 June 2023, <https://www.unodc.org/unodc/es/humanrights/hrddp.html>; interview with UN official, Geneva, 10 January 2023 (Interview #4).
- 10 United Nations Development Programme implementation tool for the human rights due diligence policy, decision-making process in managing the risks of engagement with the security sector, October 2017 (updated 2020).
- 11 UNODC, "Human Rights Due Diligence Policy," last accessed on 28 June 2023, <https://www.unodc.org/unodc/es/humanrights/hrddp.html>; IOM, "Human Rights Due Diligence Policy (HRDDP)," 29 June 2023, https://emergencymanual.iom.int/print_build/pdf/node/11131. Interview with UN official, MS Teams, 17 May 2023 (Interview #53). The informant noted that while UN Women does not have internal procedures, they have applied HRDDP "quite consistently" within projects around women and peacekeeping, but "they haven't taken the step to develop their own internal procedure".
- 12 Interview with two OHCHR officials, Geneva, 10 January 2023 (Interview #4); interview with UN official, MS Teams, 9 May 2023 (Interview #47). See also OHCHR, *Going Further Together: The contribution of human rights components to the implementation of mandates of United Nations field missions* (2020). Available at: https://www.ohchr.org/sites/default/files/Documents/Press/WebStories/Going_Further_Together_advance_unedited_version.pdf.
- 13 This analysis was based on the information in the Project Documents (ProDoc), supplemented by interviews with the implementing partners in question for many of the projects in question. The projects identified were: Burkina Faso ([PBF/IRF-386](#)); Burkina Faso/Benin/ Togo ([PBF/IRF-356](#), [PBF/IRF-358](#), [PBF/IRF-357](#)); Burundi ([PBF/IRF-225](#)); Burundi/Tanzania ([PBF/IRF-197](#), [PBF/IRF-198](#)); CAR/Cameroon ([PBF/IRF-375](#), [PBF/IRF-376](#)); Cameroon ([PBF/CMR/A-2](#)); Cote d'Ivoire ([PBF/CIV/C-2](#)); DRC ([PBF/COD/B-7](#), [PBF/COD/C-1](#), [PBF/IRF-317](#)); El Salvador ([PBF/IRF-179](#), [PBF/IRF-305](#)); Gambia ([PBF/GMB/A-3](#)); Guinea ([PBF/IRF-166](#)); Haiti ([PBF/HTI/A-1](#)); Kyrgyzstan ([PBF/KGZ/A-6](#)); Liberia ([PBF/IRF-482](#)); Lesotho ([PBF/IRF-422](#)); Madagascar ([PBF/MDG/D-1](#), [PBF/MDG/B-2](#)); Mali ([PBF/MLI/A-3](#), [PBF/MLI/A-5](#)); Mali/Niger ([PBF/IRF-299](#), [PBF/IRF-300](#)); Niger ([PBF/IRF-206](#)); Nigeria ([PBF/IRF-273](#)); Togo ([PBF/IRF-248](#)); Uganda ([PBF/IRF-303](#)); and Yemen ([PBF/IRF-236](#)). One project in CAR ([PBF/CAF/H-1](#)) did not involve support to the security sector, however interventions trained national actors on HRDDP, in addition to other human rights tools. See Pro Doc CAR ([PBF/CAF/H-1](#)), pp. 25, 37, 38, 59.
- 14 The projects are: Burkina Faso ([PBF/IRF-386](#)); Cote d'Ivoire ([PBF/CIV/C-2](#)); El Salvador ([PBF/IRF-179](#), [PBF/IRF-305](#)); Kyrgyzstan ([PBF/KGZ/A-6](#)); Liberia ([PBF/IRF-482](#)); Madagascar ([PBF/MDG/D-1](#)); Mali/Niger ([PBF/IRF-299](#), [PBF/IRF-300](#)); Mali ([PBF/MLI/A-5](#)); Niger ([PBF/IRF-206](#)); Nigeria ([PBF/IRF-273](#)); and Uganda ([PBF/IRF-303](#)).
- 15 It is also possible that HRDDP was applied but that this was not made explicit in the available documentation; efforts were made to interview as many implementing partners as possible for all of these projects but not all were available.
- 16 These four were: Cameroon ([PBF/CMR/A-2](#)); The Gambia ([PBF/GMB/A-3](#)); Lesotho ([PBF/IRF-422](#)); and Mali ([PBF/MLI/A-3](#)). In some cases, HRDDP may have been applied but not specified in the ProDocs. Given that the ProDocs may not reference HRDDP, the authors of this Review tried to interview as many project-implementing partners as possible to verify whether HRDDP had been applied. Not all were available.
- 17 In several cases, the only support provided to non-UN security forces was the means to deliver medical or humanitarian assistance Burkina Faso/Benin/Togo ([PBF/IRF-356](#), [PBF/IRF-358](#), [PBF/IRF-357](#)); Madagascar ([PBF/MDG/B-2](#)); and Togo ([PBF/IRF-248](#)). This is also not clearly stipulated as an exception within HRDDP guidance but some implementing partners may have assumed that it was. Based on analysis of project documents, there was no indication that HRDDP was applied in the above projects; although this could not be confirmed with each of the implementing partners.
- 18 The project in Yemen ([PBF/IRF-236](#)), which worked with prisons, indicated that HRDDP does not apply, although there is no clear indication that prisons are an exception to security sector assistance within the policy guidance. See Final Evaluation Yemen ([PBF/IRF-236](#)), p. 44. Another project in Haiti ([PBF/HTI/A-1](#)) also has programming around prisons.
- 19 A brief overview of the context in the DRC, including with respect to abuses by security forces, is included in the background to the DRC case study. See Erica Gaston et al., *2024 PBF Thematic Review: Synergies between Human Rights and Peacebuilding in PBF-supported Programming* (New York: United Nations University, 2024), pp. 36–37.
- 20 Daniel Levine-Spound, *Enabling Support by Mitigating Risk*, MONUSCO's

Implementation of the Human Rights Due Diligence Policy in the Democratic Republic of the Congo (Washington, DC: CIVIC, 2020).

- 21 In the PAJURR ([PBF/COD/C-1](#)) project the ProDoc notes activities including strengthening the technical and operational capacities of the police force, but then only mentions provision of training, including on human rights. In the project in mining communities ([PBF/IRF-317](#)) mining police were provided with training on “incident reporting” and sensitization on international humanitarian law, human rights, gender-based violence, and other related topics. It was not clear whether this training (in particular that on “incident reporting”) also involved other components that would not fall into the HRDDP exception. Independent evaluation of project [PBF/IRF-317](#), pp. 10–11.
- 22 There was some implication that IOM had provided sensitization on HRDDP and on human rights practices to the mining police, rather than that a risk analysis and risk mitigation process was applied to the project itself. Interview with a representative of an implementing agency, Kinshasa, 6 March 2023 (Interview #122).
- 23 Interview with PAJURR project coordinator and representative of an implementing agency, Kananga, 7 March 2023 (Interview #126). The PAJURR project was the oldest project in the case study, approved in 2018 and closed in May 2021.
- 24 Similar findings have been observed by other reporting on human rights work in the DRC. See, e.g., CIVIC, *Integrated United Nations Approaches*

to Protection during Peacekeeping Transitions: Lessons Learned from MONUSCO (CIVIC, 2023), p. 23.

- 25 Interview with PBSO staff, New York, 24 October 2023 (Interview #112).
- 26 Interview with two OHCHR officials, Geneva, 10 January 2023 (Interview #4).
- 27 Within the ProDocs, there is a specific subsection of the template that calls for an outline of risk management. This currently does not explicitly address the human rights risks or reference the HRDDP framework. In the ProDocs where HRDDP was explicitly mentioned, it tended to be in the description of the outputs or objectives. See, e.g., ProDoc Lesotho ([PBF/IRF-422](#)), p. 8; ProDoc The Gambia ([PBF/GMB/A-3](#)), p. 12.
- 28 Interview with two OHCHR officials, Geneva, 10 January 2023 (Interview #4).
- 29 See, e.g., interview with PBSO staff, New York, 24 October 2023 (Interview #112). Other staff observed that questions about HRDDP had become a more prominent part of discussions with implementing partners since 2021, particularly for those working in sectors where engagement with the security sector is more prominent, and that implementing partners have started to include a formal HRDDP assessment on the requested budget and activity list more commonly.
- 30 Interview with PBSO staff, New York, 24 October 2023 (Interview #112).