



# **Guiding Principles on Security and Human Rights in Protected Areas**

LLF ESMS Annex H

---

## CONTENTS

<b>1.</b>	<b>INTRODUCTION .....</b>	<b>1</b>
1.1	Purpose and Objective .....	1
<b>2.</b>	<b>APPLICABLE STANDARDS .....</b>	<b>2</b>
<b>3.</b>	<b>KEY TERMINOLOGY .....</b>	<b>2</b>
<b>4.</b>	<b>KEY PRINCIPLES .....</b>	<b>3</b>
<b>5.</b>	<b>SECURING HUMAN RIGHTS IN SECURITY OPERATIONS .....</b>	<b>5</b>
5.1	Human Rights Due Diligence Process .....	5
5.2	Community Consultation and Awareness .....	5
5.3	Security Management.....	6
5.4	Security Risk Assessment .....	7
5.5	Interactions with Governmental Law Enforcement.....	12
5.6	Addressing Grievances and Provision of Remedy.....	13
5.7	Monitoring, Evaluation and Review.....	13

## ACRONYMS AND ABBREVIATIONS

<b>Name</b>	<b>Description</b>
E&S	Environmental and Social
ESMS	Environmental and Social Management System
FPIC	Free Prior and Informed Consent
GM	Grievance and Feedback Mechanism
HWC	Human Wildlife Conflict
IP	Indigenous People
LL	Legacy Landscapes
LLF	Legacy Landscapes Fund
MoU	Memorandum of Understanding
NGO	Non-Governmental Organization
PA	Protected Area
PAPs	Program Affected Persons
SEP	Stakeholder Engagement Plan
SOP	Standard Operation Procedures
SMP	Security Management Plan
SRA	Security Risk Assessment
WB ESS	World Bank Environmental and Social Standards

## DOCUMENT HISTORY

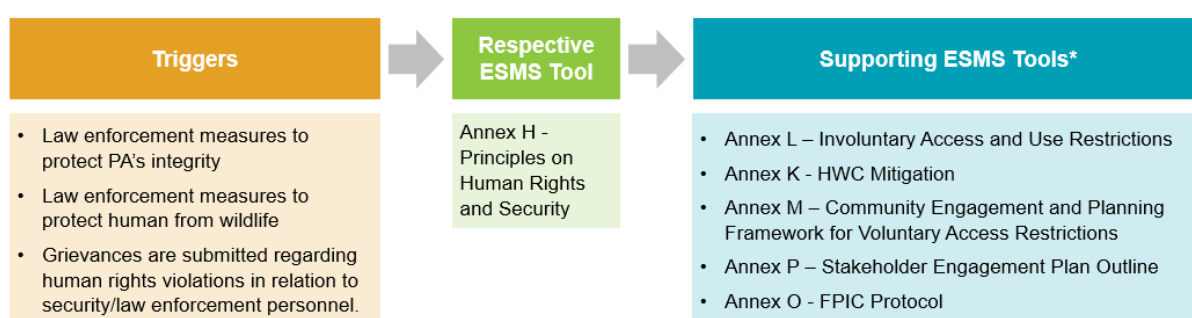
Version	Revision	Prepared by	Reviewed by	Approved by	Date	Comments

## 1. INTRODUCTION

This document provides guidance for protecting human rights in the context of security settings in protected areas (PA) and legacy landscapes (LL). This field often presents challenges, including in the field of nature conservation where it is often necessary to set up special law enforcement measures to ensure the integrity of PAs.

The achievement of conservation objectives is closely linked to the need to respect human rights. It will be impossible to secure the long-term sustainability of programs financed by LLF unless all parties involved respect the rights of affected stakeholders, including the rights of communities who live in or near these areas.

The requirement to conduct a security and human rights risk assessment might be stated in the environmental and social action plan (ESAP) that is part of the grant agreement between the grantee and LLF. Alternatively, such requirement will be triggered by LL program activity during the lifecycle of the LL program.



\* The „Supporting ESMS Tools“ are potentially applicable and/or could be used for support of the „Respective ESMS Tool“ but are not triggered by the same trigger. For the annex specific trigger refer to the respective annex document. For example, the SEP always applies, but FPIC may be a supporting document, but it is not triggered under the conditions of the first column (i.e., „Triggers“).

### Comments

All solutions that will be developed for the purposes of managing conflicts that involve security personnel, shall be underpinned by local consent (SEP, FPIC).

Local security frameworks and details of implementation are divers. Therefore, sustainable solutions that are compatible with specific local circumstances should be identified and adapted to broader solutions including local communities (CEPF).

Conflicts requiring law enforcement can include human wildlife conflict. Thus, respective law enforcement measures should be included in HWC mitigation schemes and security related documents.

Special engagement conducted regarding involuntary access and use restrictions should be guided by key principles set out in the SEP. The disclosure of the PF can be integrated in the overall stakeholder engagement process.

The grantee must adopt a human-rights-based approach when assessing adverse impacts resulting from land access and use restrictions. For further guidance on how to establish the level of grantee's involvement in an adverse impact please refer to the section on assigning responsibilities under the application of the UNGP contained in the ESAP development guidance.

### 1.1 Purpose and Objective

The purpose of this document is to explain to and guide the grantees in applying core principles regarding security and human rights in protected areas throughout their LL program activities.

The overall objective of this guidance note is to:

- Provide overall guidance for the protection of human rights in security operations;
- Introduce key principles guiding security operations in PAs;
- Present key steps for the grantee to follow in safeguarding human rights in security operations;
- Highlight the importance of other relevant standards and documents for security and law enforcement operations.

## 2. APPLICABLE STANDARDS

The full list of applicable standards for the development of guiding principles on security and human rights in protected areas are indicated in the LLF ESMS manual document. In addition, the following standards were used for the development of this guidance note and should be reflected in law enforcement operations:

- World Bank Environmental and Social Standards (2018), in particular:
  - Environmental and Social Standard (ESS) 4 and Guidance Note on ESS 4
- Voluntary Principles for Security and Human Rights (VPSHR)<sup>1</sup>;
- International Code of Conduct for Private Security Providers (2010);
- United Nations Guiding Principles on Business and Human Rights (UNGPR);
- Relevant national and international legislation and standards.

## 3. KEY TERMINOLOGY

Table 3-1 below elaborates on key terms used in this guidance note.

**Table 3-1 Key Terminology**

Term	Definition
<b>Area of Influence</b>	The area within which program's activities have the potential to create E&S changes, including the: <ul style="list-style-type: none"> <li>■ Zone of direct impact, an area, often demarcated by a LL boundary, where land access restrictions will be in place and enforced, and where program facilities may be constructed.</li> <li>■ Zone or zones of indirect impact, areas where stakeholders affected by a program's reside, work or farm, including areas that experience economic growth, increased traffic or influx as a result of program' activities.</li> </ul>
<b>Free, Prior and Informed Consent (FPIC)</b>	Free, prior, and informed consent (FPIC) is a collective human right of indigenous peoples <sup>2</sup> to give or withhold their consent prior to the commencement of any activity that may affect their rights, land, resources, territories, livelihoods, and food security. This right is exercised through representatives of their own choosing and in a manner consistent with their own customs, values, and norms. FPIC exists to promote, protect, and safeguard the full enjoyment and exercise of numerous underlying, fundamental human rights, including the rights to property, culture, and self-determination.
<b>Grantee</b>	A NGO(-s) and/or party that is in contractual agreement with LLF and receiving grant funds through the grant agreement.
<b>Human Wildlife Conflict</b>	Conflicts between human populations and wildlife caused by a variety of factors, such as population growth and loss of natural habitat (e.g., through climate change, deforestation etc.)
<b>Indigenous People (IP)</b>	Indigenous peoples are distinct social and cultural groups that share collective ancestral ties to the lands and natural resources where they live, occupy or from which they have been displaced.

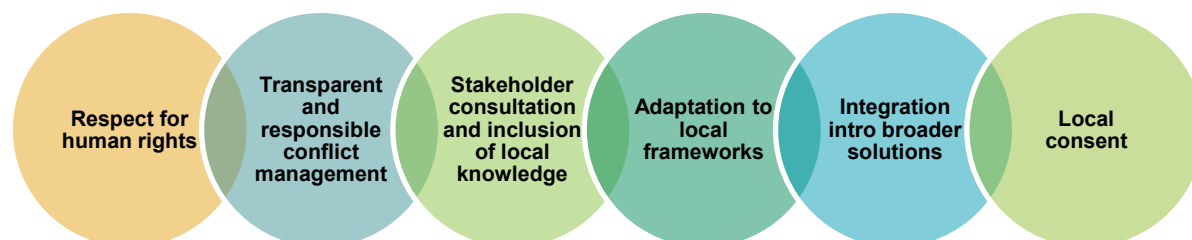
<sup>1</sup> <https://www.voluntaryprinciples.org/the-principles/>

<sup>2</sup> The LLF follows WB standard definition of IP (compare also FPIC guidance note) and requires the application of FPIC as defined per ESS7. As best practice and also to avoid potential conflicts in communities where indigenous and non-indigenous people live in mixed settings, programs might and are encouraged to adopt FPIC to those mixed communities, as well as to other local communities and vulnerable groups affected by the program.

<b>Term</b>	<b>Definition</b>
<b>Legacy Landscape Program/Program activity</b>	All activities <sup>3</sup> related to the legacy landscape and/or stakeholders that are planned, implemented and/or supervised by the grantee and/or their contractor.
<b>Legacy Landscape Staff</b>	All staff related to the legacy landscape program and/or program activity development and implementation (e.g., grantee, contractors, park management, etc.)
<b>Program Affected Persons (PAPs)</b>	Any person experiencing loss of asset, access to income whether of a temporary or permanent nature due to the land acquisition process, and/or access restrictions, regardless of whether they are physically displaced or relocated or not.
<b>Vulnerable Groups</b>	Those who are less able to access a program benefit and / or more likely to experience adverse impacts from a program’s activities as a result of a given status, which may stem from their ethnicity, color, gender, sexual identity, language, religion, political or other opinion, national or social origin, property, birth or perceived social status.

#### **4. KEY PRINCIPLES**

The following key principles presented in Figure 4-1 will guide the grantees operation in the context of security and human rights in conservation areas. Each principle is further elaborated on briefly in the sections below. Please note that the principles only serve as a brief outline of some fundamental concepts, grounded in international best practice, that should govern how law enforcement is undertaken in a LLs. The principles are not unique or indeed specific to law enforcement and reference to additional annexes below highlights areas where law enforcement interlinks with other fundamental E&S safeguard concepts.



**Figure 4-1 Key Principles for Security Management in Protected Areas**

<sup>3</sup> The application of the core principles regarding security and human rights must cover not only LLF funded activities for the LL program, but all activities in the program specific legacy landscape and surroundings.

## **Respect and duty to protect human rights**

The grantees have to recognize their responsibility to protect human rights and should abide to applicable national and international laws and provisions throughout all LL program operations and activities. The grantees have to consider compliance with the human rights principles summarised here as a basic requirement for all LL program activities and operations.

## **Transparency and responsible management of conflicting interests**

The grantees should seek to manage competing or conflicting interests responsibly and transparently, ensuring consultation with those who are most affected. This includes conflicts of interest between different groups of human stakeholders, as well as human wildlife conflict (HWC). For further guidance on HWC mitigation, please refer to LLF ESMS documents, [Annex K – Human Wildlife Conflict Mitigation](#).

## **Stakeholder consultation and inclusion of local knowledge**

Throughout its LL program activities, the grantee should consult with relevant stakeholders, including those affected by impacts stemming from security operations. Any conflicts arising from security operations requires skill and local knowledge in line with international best practice. The grantees shall include local experts and stakeholders in the development of conflict solutions. The grantees should recognize that certain stakeholder groups, such as vulnerable groups, indigenous people etc. will require special engagement strategies. For further information on how to conduct stakeholder engagement please refer to LLF ESMS documents, [Annex P – Stakeholder Engagement Plan Outline](#).

## **Adaptation to local frameworks and circumstances**

The grantees should recognise that there will be many variations in local security frameworks and the details of implementation. Therefore, sustainable solutions that are compatible with specific local circumstances will be identified and adapted to broader solutions. For further guidance on the development of local, community-based solutions, please refer to LLF ESMS document, [Annex M – Community Engagement and Planning Framework](#).

## **Integration into broad-based solutions**

Since law enforcement on its own rarely provides a solution to actual or potential conflicts, the grantee should incorporate law enforcement into broad-based solutions that will be developed including affected stakeholders. For further guidance on engaging the law enforcement party, please refer to LLF ESMS documents, [Annex I – MoU for Collaboration with Public Security Forces](#).

## **Local consent**

All solutions that will be developed for the purposes of managing conflicts that involve security personnel, shall be underpinned by local consent. This will be obtained through thorough stakeholder consultation and engagement and the inclusion of stakeholder's views and opinions in the development of solutions. Please note, that the consent of special groups, such as indigenous people and local communities might require special procedures, such as the provision of free, prior and informed consent (FPIC). For further information on FPIC, please refer to LLF ESMS documents, [Annex O – FPIC Protocol](#).

## 5. SECURING HUMAN RIGHTS IN SECURITY OPERATIONS

### 5.1 Human Rights Due Diligence Process

Part of the HRDD process is a risk assessment of any adverse impact that the management of the protected area could have on the rights of local communities and other external stakeholders as well as rangers and other employees.

LLF considers the human rights risk assessment – including an evaluation of the human rights issues that are linked to security and law enforcement – an intrinsic part of this due diligence process.

At a practical level, the findings of the HRDD may influence the LL program design.

The following questions may serve as an early indication of the level of contextual risk associated with a PA's law enforcement operations. They may help determine the scope for further due diligence. For additional guidance on how to conduct a contextual risk assessment, refer to the E&S Categorisation Tool at Annex D.

- What is the host country's record on the rule of law and respect for human rights? How far does the host government's law enforcement respect human rights?
- What are the main security threats? Is the existing or proposed security response proportionate to the level of threat?
- What is the history of conflict in and around the PA? Are there legacy issues (such as a history of forced displacement), including from earlier periods before the PA's present managers became involved? What impact do existing conflicts have on the security environment and how does this affect the security stance taken by protected area management as well as host government agencies?
- Is the existence of a PA itself a source of conflict? Does it feed into other sources of conflict?
- How does the presence of security and law enforcement personnel affect local social and conflict dynamics? For example, are the people providing the security more closely associated with one local group rather than another?
- How does their presence impact the rights of external stakeholders such as local communities? What special considerations apply to the rights of women and other vulnerable groups in relation to security and law enforcement?

### 5.2 Community Consultation and Awareness

All grantees and other implementing partners are required to consult local stakeholders throughout their LL programs, including on matters relating to security. This consultation must inform risk assessments at all stages of a program's lifecycle from inception to operational management and possible closure.

When conducting such consultations, they should be alert to the sensitivities and concerns of vulnerable groups, particularly in settings where there has been a history of lack of respect for human rights, including by law enforcement. [Annex P – Stakeholder Engagement Plan Outline](#), as well as [Annex N – Indigenous Peoples Plan](#) provide further guidance on the engagement with vulnerable groups.

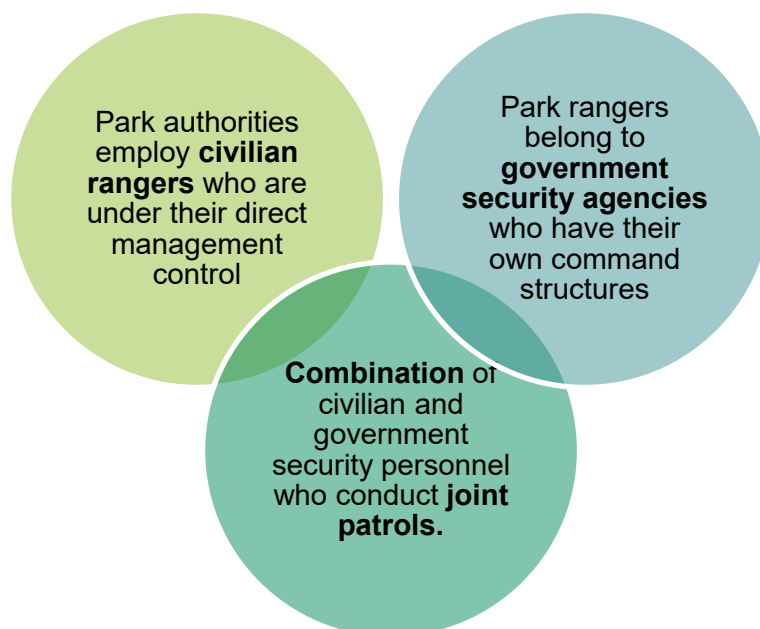
Furthermore, the grantee must find ways of ensuring that local stakeholders are aware of their rights in relation to all aspects of human rights including the security and law enforcement arrangements associated with protected areas. Such awareness raising should be included in stakeholder engagement activities. [Annex J – Human Rights Due Diligence Training](#) Guidance includes some information on how to engage with stakeholders and inform them about human rights program processes and include their views and opinions.



Consultation and communication should take place on a continuous process throughout the program-lifecycle.

### 5.3 Security Management

LLF recognizes that security frameworks for protected areas take a number of different forms depending on the local context. Figure 5-1 shows common security frameworks in PAs.



**Figure 5-1 Common Security Frameworks in PAs**

In all cases, the grantee must assess the following questions as part of their human rights evaluations:

- Is the security management plan proportionate to the threat?
- Do the rangers have the training and resources that they need to do their work to high professional standards?
- Are the rangers aware of their responsibilities in relation to community engagement and human rights?
- How are rangers managed, and by whom?
- How do conservation organisations ensure that the rangers' own human rights are respected and protected? Do they operate in adequate working conditions?
- What type of equipment do they have, and are they armed? If they are armed, have they received training in rules for the use of force?
- How are rangers recruited? What steps do conservation organisation take to ensure that individuals have good personal records and no association with past abuses?
- How are incidents reported, recorded, and investigated? What disciplinary procedures are in place?

Depending on the answers to these questions and the contextual risks impacting on law enforcement operations in a PA, further evaluation in the form of a dedicated security risk assessment may be necessary. LLF can provide further guidance on best practice approaches to undertaking such an

assessment upon request (refer to the LLF documentation, **Guidance Note: SPO for Patrolling** and **Guidance Note: SOP for Law Enforcement**<sup>4</sup>).

## 5.4 Security Risk Assessment

The following section provides guidance on how to conduct a security risk assessment (SRA). The SRA and human rights impact assessment are separate but closely interlinked. The SRA typically refers to the risk from external actors such as poachers who may pose a threat to the conservation organisation, its rangers and the flora and fauna of the PA. A human rights impact assessment considers the impact of the conservation program on rights holders, especially external stakeholders such as local communities. Often, security and human rights risks are connected and influencing one another.

In line with the UN Guiding Principles on Business and Human Rights (2011) the grantees have a duty to assess human rights impacts as part of their responsibility to respect human rights. Thus, while an internal SRA can be conducted by the grantee resources, it is highly recommended to conduct an SRA by an impartial external third party. The potential positive or negative repercussions of their security and wildlife protection programmes need to be considered amongst other aspects. This requires a systematic process that is presented in Figure 5-2 below.



**Figure 5-2 Program Risk Assessment Process**

For each item that forms part of the program risk assessment process the following table presents key performance indicators (KPIs), testing measures to indicate whether the KPI can be met or not, as well as compliance expectations that describe how a successful attainment of the respective KPI should look like.

<sup>4</sup> These guidance are available at LLF and can be shared on a request basis.

**Table 5-1 Program Risk Assessment Guidance**

<b>Process Item</b>	<b>KPI</b>	<b>Compliance Test</b>	<b>Expectations</b>
<b>Understanding the program context</b>	At the program level, the grantee has documented environmental and social impacts, including the impacts of law enforcement.	Ask to see the document.	The protocol addresses human rights impacts specifically. It gives practical guidance on how the assessment should be conducted.
	The assessment starts with a broad view of the local context, including potential conflict or legacy issues that are not directly to do with the PA but may affect local people’s perceptions of it.	Review the written assessment with this question in mind. Interview local external stakeholders as well as the program team. When doing so, ask open questions about the wider region, not just the program.	The assessment clearly lays out the wider local and regional context.
	The assessment takes account of “legacy issues”, not just the present and the immediate past. Examples may include lingering grievances from the period when the PA was set up, even if this was several years ago.	Ask local management for their understanding of the program history, including past problems and how they have been addressed. Interview external local stakeholders. Start with an open set of questions about the history of the PA.	Both sides – program management and local stakeholders – have a broadly consistent view of how the program has developed.
<b>Assessment of security risks</b>	The program has conducted a formal, security assessment.	Ask to see the assessment. Does it cover key issues? Is it up to date? What factors might lead to a change in the assessment? Discuss potential gaps with management.	The assessment provides a considered view as a basis for action.
<b>Design of security controls</b>	The program has a security management plan (SMP). The SMP includes a risk register summarising impact, likelihood, and planned law enforcement controls. Security plans are proportionate to identified threats.	Ask to see the plan.	The plan covers the key issues that are relevant given the programs general security context and specific issues identified.
	The assessment leads to documented action points with defined timelines.	Ask to see the action points.	There is evidence that the action points have been implemented.
<b>Prevention/ Mitigation of adverse human rights impacts of security controls</b>	The SMP addresses potential human rights impacts associated with law enforcement controls. Assessment leads to documented action points with defined timelines as to human rights impacts.	Ask to see the action points.	There is evidence that the action points have been implemented.

<b>Process Item</b>	<b>KPI</b>	<b>Compliance Test</b>	<b>Expectations</b>
<b>Local consultation and communication</b>	The risk assessment process includes consultation with local stakeholders.	Interview local management: how were the stakeholders selected to ensure that they were truly representative? Did the selection process take account of gender sensitivities? Did the selection process take account of local social structures, e.g., were less powerful social minorities included? Ask local stakeholders for their experience of the assessment process.	The assessment report provides evidence that the process has been truly inclusive.
	The grantees community commitments are clearly documented, including regarding security.	Interview community members to check on their understanding of the commitments.	The commitments are not only documented but also actively communicated, including in local languages and to people who may not be literate.
	Both state security and non-state rangers are fully briefed on behaviour expectations when engaging with communities.	Interview the rangers.	Rangers' responses are consistent with expectations
<b>Security management and respect for human rights</b>	There is a program-level rangers' code of ethics supported by SOPs. The code is translated into local languages.	Ask to see the written code and the SOPs. In interviews with rangers, first discuss scenarios/dilemmas that the code addresses (the important thing is that they should know what to do). Secondly, ask about their knowledge of the code. When and how do they refer to it?	The code covers key human rights issues and practices. Rangers understand what the code says and how they need to apply it.
	Rangers have the resources and management support that they need to carry out their work to high professional standards.	In interviews with rangers, ask about their training and working conditions. Ask to see their accommodation if appropriate. Ask what support they receive in difficult situations.	Rangers are demonstrably properly equipped and housed. They can give credible examples of how management supports them in difficult situations.
	Rangers receive human rights training as an integral part of their basic training on recruitment and in the form of 'on-the-job training'.	Ask to see the training syllabus. Assess how far it is appropriate for the target audience. For example, does it address the kinds of challenge that they are most likely to encounter? Confirm that training is available in local languages. Interview a selection of rangers to test awareness. Interviews should include questions about what rangers do in realistic problem scenarios, not just theoretical knowledge.	Training is appropriately targeted. This includes references to international standards but with appropriate guidance on what this means at the local operational level. Training objectives exist and there are mechanisms to evaluate the effectiveness of the training.

<b>Process Item</b>	<b>KPI</b>	<b>Compliance Test</b>	<b>Expectations</b>
	In cases where rangers are armed, the code/SOP provide clear guidance on rules for the use of force, and rangers know how to apply them.	Ask to see the training syllabus. Interview a selection of rangers to test awareness.	Evidence that the training takes place and participants have assimilated the course content.
	The code/SOPs address apprehension and detention, giving practical examples on respect for the rights of the detained.	Ask rangers to describe what happens if someone is detained: in what circumstances would this happen? What should they do and not do? Ask about actual incidents? What happened? What lessons were learnt?	Clearly written provisions on apprehension and detention that are understood and applied.
	There are clear, transparent criteria for recruitment	Ask the grantee managers an open set of questions explaining how the recruitment process works from start to finish. Ask rangers to share their story of their own experiences with recruitment. In all such interviews, emphasise that the views of individuals will be kept confidential, and make sure that they feel able to speak freely.	The equivalent of a job description stating what qualities are required of recruits. There is evidence that the recruitment process is applied and understood by candidates.
	Procedure to screen potential recruits to exclude people with record of human rights abuses.	Ask senior personnel, managers responsible how they screen potential recruits. Ask whether would-be recruits have in fact been excluded. If so, why?	There is a screening procedure. There is evidence that it is applied.
	There are formal disciplinary procedures in case rangers engage in behaviour that infringes human rights	Ask for documentation. Ask whether the procedures have been applied and, if so, what happened.	Clearly understood procedures that are applied when needed.
<b>Co-operation with external law enforcement agencies</b>	The grantee conveys human rights expectations to external law enforcement partners	Ask senior managers of the grantee how they engage with external law enforcement on human rights issues. Ask whether there is formal documentation, for example a memorandum of understanding (MoU).	A MoU covers commitment to human rights, training, screening, chain of command, use and control of weapons, investigation of incidents, transparency and medical care for the injured.
	Regular meetings, reinforcement of human rights expectations.	Ask whether these meetings happen.	Evidence that affirmation of human rights principles is a continuous process, not a 'one-off'. Documentation of regular meetings if they take place.

Process Item	KPI	Compliance Test	Expectations
	<p>There is a procedure for removing external law enforcement employees from the grantee’s program if their behaviour falls short of acceptable human rights standards</p>	<p>Ask to see to the written procedure.                      Ask whether the procedure is documented in the MoU/other agreement with external law enforcement?                      Ask whether external law enforcement employees have in fact been removed from the program.                      If this is the case, what lessons have been learnt?</p>	<p>Procedure is fully documented.                      Any lessons learnt from actual practice are absorbed and documented.</p>
	<p>There is a procedure for evaluating human rights risks associated with any loan or transfer of equipment to external law enforcement.                      To the extent possible, external law enforcement’s use of this equipment is monitored.</p>	<p>Ask whether any such loans or transfers take place or are planned.                      Ask the conservation organisation for their assessment of risks associated with transfers.                      Ask for details of formal evaluation.                      Ask how the use of the equipment is monitored.</p>	<p>Procedure is fully documented.                      Any lessons learnt from actual practice are absorbed and documented.</p>

Lastly Table 5-2 below shows several red flags, that should be used as an indicator of immediate risk and draw attention to a problem or issue to be dealt with. During a security risk assessment, the following red flags are likely to occur.

**Table 5-2 Security Risk Assessment Red Flags**

Red Flag Indicator	Guidance
There is no SMP, or it does not go into substantive detail on risk and impact assessment, and/or core human rights.	Emphasise the need for documentation, clear procedures and start by documenting current practices and use this as a basis for gap analysis.
The grantee is working in a conflict-affected area but there is no Environmental and Social Impact Assessment (ESIA). Alternatively, there is an ESIA, but it does not address human rights and security issues in any detail or at all.	Start with what does exist and seek to expand from there. Discuss the risks and impacts that are identified and work with the grantee to draw out the security and human rights implications.
The SMP does not address cooperation with external law enforcement, and the need to address human rights.	Emphasise the need for documentation and planning on this critical issue.
Cooperation with external law enforcement is a significant part of the project's law enforcement but there is no MoU covering human rights and other aspects of best practice.	Emphasise the need for an MoU. Discuss potential obstacles to reaching an agreement on an MoU and how they might be overcome
The grantee is reluctant to grant independent access to rangers (thus potential preventing them from speaking openly).	Emphasise the importance of the rangers being able to speak freely. Insist politely.
There are allegations of human rights abuses by external law enforcement agencies who – according to the allegations – are acting at the behest of the grantee.	This is one of the worst-case scenarios: the immediate requirement will be to conduct a preliminary assessment of the credibility of the allegations (not automatically assuming that they are true), and then a more substantive investigation. Remedial measures may include measures such as those summarised here to integrate human rights concerns into the structure of the relationship with government security including, for example via an MoU.

## 5.5 Interactions with Governmental Law Enforcement

Special considerations apply to government law enforcement, since they are accountable to their own lines of command. While this will always be respected by LLF and its grantees, LLF expects its grantees to take all necessary steps in establishing security partnerships between conservation organisations and government law enforcement agencies, ultimately resulting in a clear, joint commitment to human rights, which can be expressed in a Memorandum of Understanding (MoU) between the two sides. For further guidance, please refer to LLF ESMS documents, [Annex I – MoU for Collaboration with Public Security Forces](#).

However, it should be noted that such a joint commitment or the development of a MoU is not always feasible and is highly dependent on the program-specific context. In any case, the grantee needs to demonstrate that they are using the leverage that they have in the very specific context of their operations, to try and obtain a formal assurance on human rights and rules of engagement from those forces engaged in law enforcement that are not under their control.

Measures to ensure the successful collaboration between the grantee and governmental law enforcement agencies respecting human rights at all times might include, but are not limited to:

- Training to relevant government security personnel on human rights principles and practice.
- Regular meetings between the civilian conservation agency and government security counterparts where human rights matters are a standard agenda item.

For further guidance on training requirements for staff members, including security personnel, please refer to LLF ESMS documents, [Annex J – HRDD Training Requirements](#).

In cases where grantee is sharing or donating equipment or resources to government security forces, it should conduct a risk assessment to evaluate the possibility that the equipment might be used for purposes – including human rights abuses – for which it is not intended. Any such assessments should be clearly documented. Please note, that LLF will never fund the provision of arms or munitions.

If the grantees, or other implementing partners should become aware of human rights abuses involving government security forces in their area of operation, they should document and report them to appropriate public authorities, possibly at the national level rather than locally. At the same time, they must take extra care to avoid any leaks of information that could put informants or whistleblowers at risk of retaliation. Furthermore, all such incidents should be forwarded immediately to LLF as part of the serious incident reporting. For further information please refer to LLF ESMS document, [Annex S – Serious Incident Reporting](#).

## **5.6 Addressing Grievances and Provision of Remedy**

All grantees are required to set up formal and informal communication systems where stakeholders can express concerns, complaints and grievances regarding security issues, law enforcement operations and human rights. The grievance and feedback mechanism should allow the submission of complaints without the threat of retribution, which includes the possibility to submit anonymous complaints. The mechanisms should be transparent and trusted among the LL program stakeholders. This is especially important in areas where there is a weak rule of law. All grievances and feedbacks have to be investigated in a timely and fair manner, providing remedy to victims who suffered damage. For further guidance on effective grievance and feedback management please refer to LLF ESMS documents, [Annex Q – Project-level Grievance Mechanism](#).

## **5.7 Monitoring, Evaluation and Review**

LLF requires its grantees to monitor issues that are identified as a result of the human rights and security due diligence assessment. Regular reviews can be integrated into other aspects of environmental and security reviews. LLF will share lessons learned with its grantees.