



Integrating and Acting

What do the UN Guiding Principles Expect?

To address negative human rights impacts, businesses should:

- ▶ integrate the findings from their impact assessments across relevant internal functions and processes;
- ▶ act to prevent and mitigate the impacts identified; and
- ▶ have the internal decision-making, budget allocation and oversight processes in place to enable effective responses.

Why is this Important?

- Through the process of “integration” a company can take the findings from its assessment of impacts, identify who in the company needs to be involved in addressing them, and work with them to decide on an effective response.
- It is through the actions it takes to prevent or mitigate impacts that the company actually reduces its impacts on people: this is central to achieving respect for human rights.

What are the Steps Involved?





Building a Systematic Approach to Integrating and Acting

Key Points for Implementation

- ▶ If a company has strong systems in place to respond to potential human rights impacts, it is more likely to manage these risks effectively and reduce its actual impacts on people.
- ▶ If these processes are weak, action is more likely to be ad hoc, to miss some risks altogether and to fail to contribute to sustainable improvements over time.

Possible Approaches

- **Integrating key staff into decisions on how to address impacts:** The internal staff who are closest to an E&R agency's potential impacts need to be involved in identifying and implementing solutions; otherwise they may not be sustainable. This will typically mean the staff responsible for engaging with candidates and workers that the agency recruits or places, as well as those responsible for relationships with client companies, user enterprises and any partner E&R agencies.

In smaller E&R agencies, day-to-day communication may be enough to achieve this integration. In larger companies, it can require a more systematised approach. This may include:

- Developing structured cross-functional decision-making groups;
- Including staff from relevant functions or departments in discussions with external experts on specific challenges;
- Having clear internal reporting requirements on the implementation of decisions;
- In the case of high-risk contexts or severe impacts, involving senior management in decision-making and oversight.

- **Roles for corporate/head office-level:** For E&RA companies that operate in multiple markets, the corporate or head office-level can play an important role in helping share experiences within the company about how to address certain kinds of impacts. In this way, options that have been successful in one context can be considered in others. It may be useful periodically to bring together the staff working on these issues at the local level to share their experiences directly. This can support the spreading of good practices. It may also point to common challenges that suggest a need for new or amended guidance from the corporate level.
- **Systems for protecting personal information:** All E&R agencies need to handle sensitive personal information whether it relates to internal staff or workers that they recruit or place. How effectively they manage this can directly impact on those individuals' right to privacy.

Companies should consider a range of approaches to make sure that their systems adequately protect individuals' personal information, including:

- How the company informs individuals about how their personal information will or may be used;
- Whether the information that is collected is necessary to the intended use(s);
- Where information is stored;
- Whether retention periods are appropriate to the anticipated use(s) of that information;
- What the options are for deleting, aggregating or "de-identifying" information when the period expires, and any potential human rights implications of such approaches;

- Whether security measures for the retention and transfer of personal information (where that is necessary, such as to/from client companies or user enterprises) are appropriate to the sensitive nature of the information.

III B Prioritising Impacts for Action

Key Points for Implementation

- ▶ In some instances, resource constraints will mean that a company needs to prioritise which impacts it will address first.
- ▶ Prioritisation should depend first and foremost on the severity of the impacts on human rights. An assessment of **severity** should take into account the perspectives of those who may be impacted.

Possible Approaches

- **Focusing on the risk to human rights:** Traditional prioritisation or “heat mapping” of risks rates the severity (or “consequence”) of impacts in terms of the risk they pose to the company. For human rights due diligence, severity is about the risk posed to human rights.
- **Understanding severity:** In some cases, it will be clear which impacts are potentially severe based on their:
 - **Scale:** How grave the impact is – for example, forced labour by migrant workers placed in positions of debt bondage;
 - **Scope:** How many people are or will be affected – for example, impacts on the freedom of association of a whole workforce, or discrimination against all members of a minority group;
 - **Irremediable nature:** Whether it will be difficult or impossible to restore the people impacted to a situation that is equivalent to their situation before the impact – for example, grave or life-threatening health impacts on individual workers.

In other cases, it will be important to engage with affected stakeholders or their representatives to understand fully how severe impacts might be in practice.

- **Mapping severity and likelihood to identify priorities:** The other relevant factor for prioritising action is the likelihood of an impact. The likelihood of an impact may be increased by:
 - (a) The local operating context(s) where the particular impacts may occur, as well as
 - (b) Specific business relationships that may be involved.

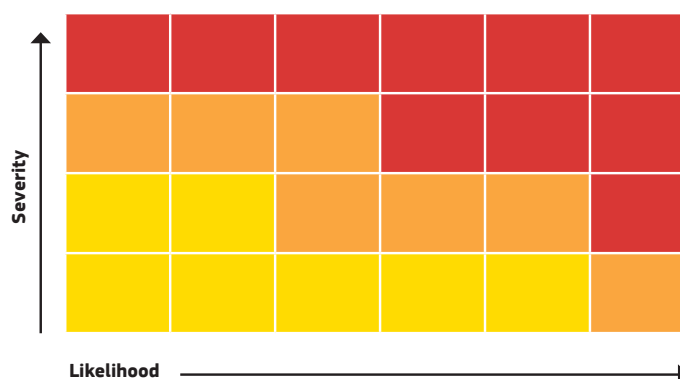


Figure 4: Human Rights Risk Map for Prioritising Action

In traditional risk prioritisation, a risk that is low severity but high likelihood would have a similar priority to a risk that is high severity but low likelihood. However, in the case of human rights risks, a “high severity-low likelihood impact” takes clear priority.

In addition, while it may seem simplest to prioritise action on those impacts where the company has greatest leverage, in the context of human rights, it is the severity of impacts that should set priorities; leverage becomes relevant only in then considering what can be done to address them.

Prioritisation is a relative concept. This means that once the most severe potential impacts have been prevented or mitigated, the next most severe impacts need to be dealt with, and so on through all the impacts identified. Of course, different individuals or functions/departments within the company may be able to address different risks in parallel.

- **Addressing different levels of risk:** E&R agencies may still need to know which risks to address first within each level of severity, starting with those in the most severe category. The logical starting point will be with those impacts that are most likely. E&R agencies may also wish to take account of where they are most able to achieve change. Where these judgements are particularly difficult, it may be helpful to discuss or test proposed approaches with appropriate experts.



Identifying Options to Prevent or Mitigate Potential Impacts

Key Points for Implementation

To identify the best ways to address potential impacts, a company first needs to understand the nature of its involvement:

- ▶ Where the company is at risk of **causing** an impact, it should take the necessary steps to prevent the impact from occurring.
- ▶ Where the company is at risk of **contributing** to an impact, it should first take steps to avoid this contribution. Where it does not control those who may contribute to the impact, it should use its leverage with them to mitigate the remaining risk.
- ▶ Where a negative impact may be **directly linked to the company’s operations, products or services through a business relationship**, even without a contribution by the company itself, it should use whatever leverage it has to mitigate the risk that the impact occurs.

Possible Approaches

- **Addressing impacts the company may cause or contribute to:** E&R agencies may find themselves facing difficult decisions on how to address some human rights risks. For example:
 - An action to reduce the risk of human rights impacts on some stakeholders may create risks for others. For example, combating trafficking is vital to protecting migrant workers’ human rights; however, in some cases, women who have been victims of violent (often domestic) crimes use smugglers to escape their abusive situation. This requires a case-by-case analysis to avoid unintentionally preventing such women from reaching safety through broader anti-trafficking efforts.
 - An action to reduce the risk to one human right may increase the perceived risk to another. For example, identifying workers with serious diseases and helping them access treatment can impact on their right to privacy.

Addressing such risks requires a full understanding of the issues and an ability to work with this complexity. It is not an option simply to assume that an increase in respect for one right cancels out reduced respect for

another right. Instead, efforts must be made to address all the impacts, while recognising that perfect solution may not exist.

In some cases there will be examples of how to manage these tensions successfully. Where examples are not available, it can be particularly beneficial to involve experts in discussions on how to respond (such as in the example of women fleeing domestic abuse above). Depending on the issues, it may be possible to involve representatives of affected stakeholder groups in seeking a collaborative solution that also reflects their ideas and preferences.

- **Addressing impacts that are linked to the company's operations, but without any contribution on its part:** Negative impacts can be directly link to an E&R agency's operations even when it has not caused or contributed to them. For example, if a client company tolerates sexual harassment against women in its facilities, or an E&R agency involved at a much earlier step of the international recruitment and employment process charges fees to migrant workers, putting them in a position of debt bondage.

In this situation, the Guiding Principles make clear that the E&R agency should take reasonable steps to prevent or reduce the risk of these impacts recurring. The main means of doing so is through the company's leverage over those who caused the abuse, which can vary widely in different situations. Approaches to creating and using leverage are discussed in [Section III-D](#) below.

III D Creating and Using Leverage in Business Relationships

Key Points for Implementation

- ▶ The Guiding Principles define “leverage” as the ability of a company “to effect change in the wrongful practices of an entity that causes harm”; in short, its ability to influence the behaviour of others.
- ▶ Leverage does not determine whether a company has responsibility for an impact: responsibility results solely from the company's involvement with the impact through cause, contribution or “linkage”.
- ▶ Leverage is relevant for identifying ways to address those impacts identified. Companies should use their leverage to try to change the behaviour of any business partners involved. If a company lacks leverage there may be ways to increase it.
- ▶ If it proves impossible over time to achieve change through their leverage, companies should consider ending the relationship in question, taking into account:
 - Credible assessments of any negative impacts from doing so;
 - That the more severe the abuse, the more quickly the business will need to see change before it decides whether to end the relationship.
- ▶ If a company stays in a business relationship with risks of severe impacts – for instance where it concludes no reasonable alternative exists – it will need to:
 - Be able to show how it is trying to mitigate the risks;
 - Be prepared to accept any consequences of the continued relationship (whether legal, reputational, financial).

Example: Auditing the Performance of other E&R Agencies

One smaller E&R agency that specialises in international recruitment processes offers an audit service to clients where they are experiencing problems on existing projects as a result of corruption or unethical practices by other recruitment service providers. Senior staff from the E&R agency conduct a thorough audit and recommend how the client should address the problem. This may include the replacement of corrupt and incompetent managers and unsuitable personnel with 'fit for purpose' workers recruited through the E&R agency's ethical processes, and/or the redeployment of existing personnel who are qualified, once they have severed their ties with the unethical recruitment agency. The outcome in all audits provided to date has been that the client terminated their contract with the unethical recruitment agencies and adopted the E&R agency's approach that seeks to respect the rights of individual workers.

Resources: Referencing Principles or Codes for User Enterprises

Principles and codes addressed to user enterprises are increasingly including provisions on agency workers. For example, the Fair Labour Association's [Workplace Code of Conduct](#) includes commitments not to use "contract/contingent/ temporary workers" in certain circumstances, including where there is excessive use of fixed-term contracts with no real intent to impart skills or provide regular employment.

IFC [Performance Standard 2](#) requires companies who receive IFC funding to establish systems for managing and monitoring the performance of E&R agencies supplying "contract workers", including with regard to freedom of association, non-discrimination, health and safety, prohibition of forced labour and grievance mechanisms. IFC clients must use commercially reasonable efforts to incorporate these requirements in contractual agreements with E&R agencies.

Possible Approaches

An E&R agency's business partners have their own responsibility to respect human rights throughout their operations. However, if they are unable or unwilling to meet that responsibility, any resulting human rights impacts may be directly linked to the E&R agency's operations. So it is important for E&R agencies to carefully think through the leverage they currently have, or can build, in their business relationships.

- **How is leverage generated?** Leverage is not limited to legal control and may reflect a range of other factors, such as:
 - the terms of any contract between the company and the third party;
 - the proportion of business the company represents for the third party;
 - the company's ability to incentivise the third party to improve its human rights performance (for example through future business);
 - the reputational benefits for a business partner of working with the company;
 - the company's ability to work with peers, business associations or through multi-stakeholder initiatives to incentivise improved human rights performance;
- **Leverage with client companies and user enterprises:** An E&R agency's leverage will often be very different as between the client companies and user enterprises it works with. In the former case, the relationship is often a one-off transaction; once the candidate is employed by the client company he or she ceases to have any relationship with the agency and the client company may never contact the agency again. Where an E&R agency is placing agency workers with user enterprises, there will often be an on-going relationship between the agency and the user enterprise. This is especially so where the user enterprise engages in "Recruitment Process Outsourcing" (or RPO), in which an E&R agency is essentially embedded in, and operates as, the Human Resources function of that user enterprise.

Other factors that may affect an E&R agency's leverage include the:

- Proportion of the client/user enterprise's need for E&R agency services that the agency currently represents;
- Reputation of the E&R agency for identifying workers with the right skills who are properly prepared for the job;
- Degree of worker turnover/seasonal fluctuations in the sector;
- Level of competition between E&R agency services within the relevant sector;
- Existence of long sub-contracting chains in the international recruitment and employment process (versus situations where one agency manages the whole process);
- Agency's geographic proximity to the client/user enterprise (i.e., whether they are located in the same or a different market);
- Presence of active industry associations and/or effective government action on these issues in the relevant market.

Some of these factors an agency may be able to directly influence; others it is unlikely to be able to address on its own.

Much of an E&R agency's leverage with a user enterprise or client company will be established in the terms of its contract with that business. It is therefore important to consider critical human rights issues during the contract negotiation stage for inclusion in the final agreement. In all cases, these issues should include:

- Confirming that the wage that will be paid to the worker is at least in line with any applicable collective bargaining agreements and with local "living wage" norms, and certainly is not below the legal minimum wage. Whatever method is used, work being done mainly by women should not be undervalued when compared with work of equal value done by men (see [Section II-C](#)). In the case of agency workers, this means asking whether the user enterprise will pay a fee that will enable the E&R agency to pay them such a wage;
- Checking that workers will be provided with appropriate working conditions, including relevant health and safety equipment and training;
- Investigating whether workers' welfare will be appropriately addressed, including through access to effective grievance mechanisms (see [Section VI](#) below).

E&R agencies can consider referencing principles or codes developed by multi-stakeholder or international organisations and addressed to user enterprises (see the Resources Box in this section). Agencies will also want to consider appropriate escalation and contract termination provisions in the case of significant negative impacts on workers arising from the actions of the user enterprise or client company, including provisions on access to effective remedy for affected workers.

- **Developing systems for responding to discriminatory requests by client companies and user enterprises:** User enterprises and client companies can and do make discriminatory requests for workers. If an E&R agency complies with such requests, it risks directly contributing to discrimination in the recruitment process.

Discrimination involves an unjustifiable distinction or preference on the grounds of a person's particular characteristics or status, such as race, colour, national or ethnic origin, gender, age, or disability. In other words, there is no objective and reasonable basis for making the distinction.

International human rights law recognises that in some cases, states may need to take "special measures" to address the position of disadvantaged groups in society, based on their particular characteristics or status. Such measures must be appropriate to the situation to be remedied, proportionate and temporary, among other things. Where particular measures meet these criteria (for example, legislation seeking to address the historical legacy of the crime of apartheid), they are an important means of advancing non-discrimination. However, where distinctions are not made for such purposes, then they are highly unlikely to be justified under international human rights law.

Responsible E&R agencies are alert to the risks posed by discriminatory requests from client companies and user enterprises and have sought to put in place robust systems for dealing with them. Possible approaches to managing the risks arising from such requests include:

- Providing thorough guidance and training for internal staff on what to do when discriminatory requests are received;

Example: Discussions with Business Partners

Some E&R agencies have begun tracking the linkages between unethically recruited workers, or poor treatment by client companies or user enterprises of workers who are recruited or supplied by E&R agencies, and lower levels of worker morale and productivity. In discussions with their business partners they are making the case that the benefits of ethical recruitment and employment processes – "delivering the right candidate at the right time at the right price" – include the following:

- ▶ Workers with high morale are more productive, leading to lower payroll and associated costs by avoiding fast turnover;
- ▶ High morale leads to greater continuity, both in terms of reduced sickness rates and greater time in the same job, which in turn reduces the costs of needing to re-train workers;
- ▶ Workers who are appropriately trained and skilled for the job are capable of producing higher quality outputs.

One E&R agency, working in partnership with a foundation, will conduct a pilot project in the construction sector in the Gulf region with the aim of demonstrating that a workforce that is ethically recruited, appropriately trained and professionally managed is more productive than a workforce that is recruited based on a vulnerability or willingness to enter into debt bondage.

Resources: Non-discrimination and Diversity

- ▶ ILO, [Equality at Work: The Continuing Challenge](#)
- ▶ ILO, [Global Business and Disability Network](#)
- ▶ European Commission, [networks of experts on anti-discrimination](#)
- ▶ European Commission, [material on the business case for diversity](#)
- ▶ European Network Against Racism, [Equal@Work initiative for businesses](#)
- ▶ Business in the Community, [Opportunity Now on combating gender discrimination](#)
- ▶ The National Human Rights Institution in the relevant country
- ▶ UN Global Compact, [Women's Empowerment Principles](#)
- ▶ ILO Convention 181 on Private Employment Agencies and, in the EU, the Temporary Agency Work Directive

Example: Joint Pledges with Government on Non-discrimination

A national association signed a pledge with that state's public employment agency committing both parties to work together to support improved practices on diversity within the sector. The pledge highlights the importance for employers of having a mixture of backgrounds, cultures, approaches and thinking in their workforce. It provides a model policy commitment that E&R agencies can sign up to and undertake to review all aspects of the recruitment and employment process, actively seek to identify and promote diverse candidate pools, and work with other actors to challenge discrimination wherever it occurs.

- Establishing escalation pathways so that requests are flagged by sales staff with someone more senior, so that there are at least “two pairs of eyes” on any decision to proceed to contract;
- Discussing the issue wherever possible with the user enterprise/client and sharing evidence of the benefits of non-discrimination and diversity with the company (for resources on this see the Box in [Section III-D](#));
- Pointing to relevant principles within the industry or requirements imposed by other user enterprises or government clients to support an argument that the agency has to adhere to them throughout its operations;
- Being willing to refuse contracts with particular user enterprises/clients where they insist on requests that are clearly discriminatory and put the E&R agency at risk of contributing to severe negative human rights impacts;
- Sharing anonymised information about repeat types of discriminatory requests or emerging issues (e.g., due to changes in national law or practice) with peer companies and discussing appropriate responses, including through national industry and employers' associations.

It is important that E&R agencies keep thorough records of such requests and the company's responses to them as part of their broader human rights due diligence tracking efforts. Some larger agencies have disclosed appropriately anonymised information about the requests they receive and their approaches to handling them. These issues are discussed further in [Sections IV](#) below.

- **Leverage with governments:** In some cases, E&R agencies will contract directly with state agencies for the recruitment or supply of workers (typically for clerical roles or guest-worker programs). These contracts should reflect the agency's responsibility to respect human rights.

Where an E&R agency seeks to use its leverage to lobby a government on policy or regulatory measures, it should ensure that this:

- Is consistent with the company's own responsibility to respect human rights;
- Would not, in practice, undermine the state's duty to protect human rights (meaning its obligations to protect individuals from business-related human rights harms through effective policies, legislation, regulations and adjudication).

Where governments are unwilling to include human rights provisions in regulatory schemes for migrant workers, and where other legal protections are weak, E&R agencies need to look for opportunities to continue to engage with the government on these issues. E&R agencies working in the same country may be able to engage the government collectively in discussions on relevant human rights risks, as companies in other sectors (such as oil and gas) have successfully done, including with the help of other stakeholders.

- **Leverage with other E&R agencies:** Approaches that can help an E&R agency generate leverage where it partners with another agency to provide recruitment and employment services can include:
 - Inserting language into contracts that requires compliance with the agency's own policy commitment, or other principles that align with internationally-recognised human rights;

- Committing to increased prices with the partner agency and/or sustained/increased future business in recognition of good human rights performance;
 - Helping the partner agency develop its own knowledge and systems to ensure respect for human rights, for example, where an E&R agency contracts out the recruitment process, by accompanying the partner agency through the process (as user enterprises are increasingly doing with E&R agencies);
 - Supporting the partner agency with metrics that can help them both recognise and enhance the correlation between improved human rights practices and other business benefits, such as increased productivity and quality, including in their own interactions with client companies and user enterprises;
 - Providing feedback and mentoring when problems are initially identified, rather than simply “black-listing” the relevant partner agency;
 - Making clear, if practices do not change, what the consequences may be, including termination of the relationship;
 - Where necessary, reducing the number of partner agencies so that the E&R agency has enhanced oversight of (and accountability for) the entire recruitment and employment services process.
- **Collaborative approaches to generating leverage:** Working together with others (e.g., peer companies, trade unions, industry and employers’ associations, government, and civil society and/or international organisations) can be an important means for E&R agencies of generating leverage to address some of the most endemic human rights challenges in the recruitment and employment process, such as denial of freedom of association and collective bargaining rights, pervasive discrimination, forced labour and trafficking (see Box in Section II-C).

Such approaches can include supporting the establishment of a local E&R agency industry association where one does not exist, or where that is not possible, building looser, local coalitions or networks with other E&R agencies that are also seeking to respect human rights in their operations.



Acting in High-Risk Contexts

Key Points for Implementation

- ▶ The responsibilities of companies with regard to human rights do not increase in high risk contexts, but the challenges of fully meeting those responsibilities often do.
- ▶ Home states have a particularly important role to play in supporting companies operating in situations of heightened risk to human rights, including by providing adequate assistance to their efforts to assess and address these heightened risks.
- ▶ Companies should pay particular attention to any risk of causing or contributing to gross human rights abuses, which may also have legal implications for the company.

Possible Approaches

- **Operating where governments systematically fail to protect human rights:** Under the Guiding Principles, companies are expected, wherever possible, to respect internationally recognised human rights as well as comply with national law. Where national law is silent, or weak, there is no reason for companies not to operate to the higher standard. For example, if an E&R agency routinely prohibits the charging of any fees for the recruitment process to workers, but the law in one country allows this, the agency should continue nonetheless to implement its general approach.

Where national law and human rights conflict, E&R agencies should respect the principles of internationally recognised human rights to the greatest extent possible in the circumstances. They should also be prepared to explain their efforts to do so. Where there appears to be such a conflict, an E&R agency's assessment processes should identify this risk. The agency should then actively explore the extent of the conflict, for example by:

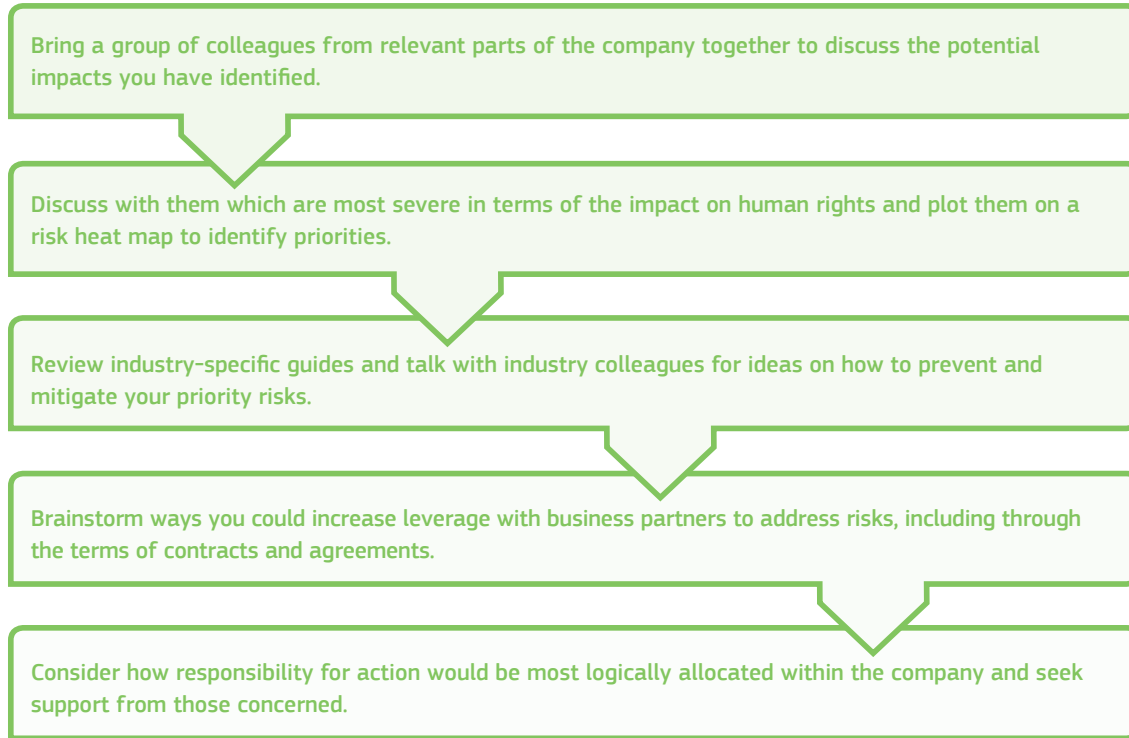
- Seeking clarification from the relevant government ministry or agency;
- Challenging the relevant provision where that is feasible, for example through an industry association;
- Learning from what peer companies have done.

As E&R agencies consider how they might best honour the principles underlying internationally-recognised human rights in such situations, it will often be helpful to discuss the challenges with external experts, and where possible with workers or their representatives, to gain their perspectives on any proposed approaches. E&R agencies should consider how transparent they can be with workers, business partners and others about the extent of the conflict, and the company's approaches to addressing the challenges it faces. For more on communicating, see [Section V](#) below.

- **Preparing for dilemma situations:** The more an E&R agency has prepared staff for dilemmas through training, scenarios, “lessons learned” exercises and similar approaches, the better prepared it will be to respond to challenging situations. It could:
 - Educate key branch staff about ways in which local laws may be used selectively – or not respected in practice – that could undermine respect for human rights;
 - Back this up with senior-level engagement when a particular dilemma situation arises, for example when discriminatory requests are made by client companies or user enterprises;
 - Establish good channels of communication with the agency's home state government (where that applies) and confirm the extent of any diplomatic support available if the situation deteriorates and workers may be put at risk;
 - Work collaboratively with other E&R agencies, industry associations and where relevant with trade unions to develop joint approaches.
- **Export Processing Zones (“EPZs”):** Experience shows that in EPZs there can often be a lack of enforcement of standards protecting workers' human rights and/or deliberate signalling by the government that lower standards will be tolerated. This can lead to pervasive company practices that fall short of minimum national, let alone international, standards on freedom of association and collective bargaining (among other human rights). This creates acute challenges for E&R agencies that provide services to client companies or user enterprises in EPZs. In such situations, collaborative efforts at the regional or national levels among E&R agencies and clients/user enterprises will be particularly important, including direct engagement with the government or local authorities to enhance both standards and/or their enforcement. (For one example, see the [Protocol on Freedom of Association in Indonesia](#).)

Where to Start

For companies that are just starting to focus on integrating and acting, the following are some preliminary steps to consider:



Questions to Ask

The following questions correspond to sub-sections A, B, C, D and E above. They should help test the extent to which the company's processes to integrate and act on the results of its assessments are consistent with the Guiding Principles:

III-A	Building a Systematic Approach to Integrating and Acting
	<ul style="list-style-type: none"> ▶ How do we involve those internal staff whose work relates to our potential impacts in finding ways to address them? ▶ Are there ways in which we can help share learning about effective options for preventing and mitigating impacts within the company?
III-B	Prioritising Impacts for Action
	<ul style="list-style-type: none"> ▶ Do our existing processes prioritise which human rights impacts we address first based on their severity? If not, how could we adjust them to do so? ▶ How do we take account of how the local operating context or specific business relationships may increase the severity or likelihood of a potential impact?
III-C	Identifying Options to Prevent or Mitigate Potential Impacts
	<ul style="list-style-type: none"> ▶ How do we identify the most appropriate options for addressing impacts we may cause or contribute to? ▶ How do we take account of impacts that may be linked to our services, but without any contribution on our part, and identify ways to reduce these risks?
III-D	Creating and Using Leverage in Business Relationships
	<ul style="list-style-type: none"> ▶ Have we thought through all our potential forms of leverage with business partners? ▶ What processes do we have for building leverage into our business relationships from the earliest stages? ▶ How do we know that our systems for responding to user enterprise and client company requests are robust? ▶ How do we build and use leverage in engaging with government? ▶ How do we build and use leverage when we partner with other E&R agencies, particularly in international recruitment processes? ▶ Is there more we could do to generate leverage in order to reduce the risk of negative human rights impacts being linked to our services? How can we learn from peers and stakeholders about the options that may exist?
III-E	Acting in High-Risk Contexts
	<ul style="list-style-type: none"> ▶ Do internal staff understand the need to try to honour the principles of internationally-recognised human rights even where they appear to conflict with national law? How do we manage this in practice? ▶ What additional steps do we take in contexts where governments systematically fail to protect human rights to address the increased risks of involvement with human rights impacts? ▶ How do we prepare internal staff for handling dilemma situations and internalise any learning?