EVALUATION

EVALUATION OF HUMAN RIGHTS-BASED APPROACH (HRBA)
IN FINLAND'S DEVELOPMENT POLICY AND COOPERATION

Volume 2 • Case study reports

Ministry for Foreign Affairs of Finland

EVALUATION

EVALUATION OF HUMAN RIGHTS-BASED APPROACH (HRBA) IN FINLAND'S DEVELOPMENT POLICY AND COOPERATION

Ian Christoplos (Team Leader)
Henrik Alffram
Annica Holmberg
Elina Tran-Nguyen
Roosa Tuomaala
Christine Kamau
Daniel Phiri
Gabriel Wilhelm
Christina Paabøl Thomsen

particip

NIRAS

Lead Company

2023:5

Contents

LIST OF TABLES

LIST OF BOXES

Acronyms and Abbreviations

ADF	African Development Fund
AfDB	African Development Bank
AGS	Accelerated Growth for Micro, Small and Medium-Sized Enterprises
AU	African Union
CCO	Cross-cutting objective
CEDAW	Convention on the Elimination of All Forms of Discrimination Against Women
CEFM	Child and Early Forced Marriages
CESR	Center for Economic and Social Rights
CSE	Comprehensive Sexuality Education
CSO	Civil Society Organisation
CWD	Children with Disability
CYECE	Center for Youth Empowerment and Civil Education
CRPD	United Nations Convention on the Rights of People with Disabilities
DAC	Development Assistance Committee
DPF	Disability Partnership Finland
EIF	Enhanced Integrated Framework
ERET	External Review and Evaluation of forest projects in Tanzania
ESG	Environmental, social, and corporate governance
EU	European Union
FAO	Food and Agriculture Organization of the United Nations
FCA	Finn Church Aid
FLC	Fund for Local Cooperation
FLOM	Finnish Lutheran Overseas Mission
FCG	Finnish Consulting Group
FCWC	Foxes Community and Wildlife Conservation
Felm	Finnish Evangelical Lutheran Mission
FGM/C	Female genital mutilation/cutting
FSN	Finnish Somalia Network
FMI	Finnish Meteorological Institute
FSPM	Finlands Svenska Pingstmission
FORVAC	Forestry and Value Chains Development
Frelimo	Mozambique Liberation Front
GBV	Gender-Based Violence
GTA	Gender transformative approach
GAM	Gender with age marker
GCF	Green Climate Fund
GEF	Global Environment Facility
HRBA	Human Rights-Based Approach
HRIE	Human Rights, Inclusion and Equality
ICI	Institutional Cooperation Instrument
ICRC	International Committee of the Red Cross
IDP	Internally displaced person
IFAD	International Fund for Agricultural Development
IFC	International Finance Coalition
IFI	International Finance Institution

ILO	International Labour Organization
IOM	International Organization for Migration
IPA	Integrated Protection Approach
IPPF	International Planned Parenthood Federation
IRM	Independent Review Mechanism
KAIH	Kenya Association of the Intellectually Handicapped
KII	Key informant interview
LGA	Local Government Authority
LDC	Least developed country
LGBT	Lesbian, gay, bisexual, and transgender
LGBTQI	Lesbian, gay, bisexual, trans, queer, intersex
LHRC	Legal and Human Rights Centre
LiiKe	Liikunnan kehitysyhteistyö
M&E	Monitoring and Evaluation
MSMED	Ministry for Small and Medium Enterprise Development
MFA	Ministry for Foreign Affairs
MRG	Minority Rights Group International
MSME	Micro, small & medium-sized enterprises
MTR	Midterm Review
MSIA	Marie Stopes International Reproductive Choices Afghanistan
NAPSA	National Pension Scheme Authority
NDF	Nordic Development Fund
NRC	Norwegian Refugee Council
NGO	Non-governmental Organisation
NRTP	The Network for Religious and Traditional Peacemakers
OHCHR	Office of the United Nations High Commissioner for Human Rights
OPD	Organisation of Persons with Disabilities
OSCE	Organization for Security and Co-operation in Europe
PFP	Participatory Plantation Forestry Programme
PiVP	Person in a Vulnerable Position
PSR	Physicians for Social Responsibility Finland
QA	Quality Assurance
RENAMO	Mozambican National Resistance Movement
RWPL	Rural Women Peace Link
SAFETAG	Secure Auditing Framework and Evaluation Template for Advocacy Groups
SASK	Finnish Trade Union Solidarity Centre
SDA	Sports Development Agency
SDG	Sustainable Development Goal
SEA/SH	Sexual Exploitation and Abuse
SFSP	Sudan Family Support Programme
SGBV	Sexual and Gender-Based Violence
SH	Sexual Harassment
SME	Small and medium-sized enterprises
SRH	Sexual and Reproductive Health
SRHR	Sexual and Reproductive Health and Rights
SHIVYAWATA	Tanzania Federation of Disabled Peoples' Organisations
THRDC	Tanzania Human Rights Defenders Coalition
THL	Finnish National Institute of Health and Welfare
TRALARD	Transforming Landscapes and Resilience for Development Project
UHMC	Ukrainian Hydrometeorological Center
UN	United Nations
UNDP	United Nations Development Programme

UNFPA	United Nations Population Fund
UNPRPD	United Nations Partnership on the Rights of Persons with Disabilities
UNGP	UN Guiding Principles on Business and Human Rights
UNICEF	United Nations Children's Fund
UNHCR	United Nations High Commissioner for Refugees
UNOPS	United Nations Office for Project Services
UPR	Universal Periodic Review
VCPC	Village child protection committee
WAMAMA	Wezesha Amani Mashinani na Mama
WB	World Bank
WBPC	West Bank Protection Consortium
WiVP	Women in Vulnerable Positions
WFTO	World Fair Trade Organisation
WTO	World Trade Organization
YWCA	Young Women's Christian Association
YMCA	Young Men's Christian Association

CASE STUDY:
HRBA IN THE CONTEXT OF
LONG-TERM PARTNERSHIPS

1   Introduction

This case study comprises one of seven prepared for the Ministry of Foreign Affairs (MFA) Finland's Evaluation of the Human Rights Based Approach (HRBA) in Finland's Development Policy and Cooperation. The other case studies are (1) HRBA in transition contexts, (2) HRBA in conflict contexts, (3) HRBA in severe headwinds, (4) Innovations and trends towards transformational programming, (5) HRBA in partnering with multilaterals, and, (6) From CCO to HRBA, lessons from disability programming.

The purpose of each Case Study is to apply the overarching evaluation questions, design and methodology of the strategic level evaluation while adapting their analysis for the specifics of the thematic context.

The specific objectives of each case study are:

- To provide a contributory evidence stream to the overall strategic evaluation;

- To help interrogate the wider theoretical framework for the evaluation (see Inception Report) by generating evidence to inform it and

- To generate lessons/implications to help inform MFA stakeholders in their HRBA as part of the constructive approach adopted by the utilisation-focused model of the overall evaluation.

No case study is explicitly a full evaluation of Finland's HRBA in its context, which would be beyond its remit. Accordingly, it does not provide recommendations but rather proposes some lessons/implications to support internal dialogue and learning.

This case study looks at how HRBA is integrated into designs and applied in practice in Finland's long-term partnership in development cooperation. The long-term nature of partnerships in this kind of cooperation builds some common factors that could enable a strong application of HRBA:

1. It is a context well-known to the MFA;

2. Finland-based partners to the MFA generally have a good knowledge of the context and,

3. There are already established partnerships in various sectors with local and national actors (government, multilaterals, civil society, research institutions, and to a certain extent, the private sector).

Likewise, for many countries with long-term development cooperation, though struggling with many development challenges, accountability claims by citizens and civil society are accepted by the state. At least in principle, there should be a social and political environment that enables the promotion of inclusive, democratic, and rights-based shifts in society.

The case study looks at partnerships in two countries, Tanzania and Mozambique, with a focus on the first. The Tanzania sample reflects funding through different aid modalities and types of partnerships, while Mozambique, included for comparative purposes, is based on a limited desk

review and key informant interviews (KII) with embassy staff and one implementing partner. The selection has enabled an analysis of HRBA in similar cultural and social settings. These neighbouring nations share similar economic development challenges, and though the political history differs between the two, there are several commonalities in how politics are shaped. The civic space and freedom of expression have decreased in both countries in recent years, though there are indications that the negative trend in Tanzania is turning (see discussion below).

1.1 Assumptions and guiding questions

The long experience and knowledge of the context are presumably factors that would enable the practice of the rights-based principles. The relative stability is assumed to create good conditions for a holistic approach to human rights, which in turn would mean that a progressive or transformative HRBA would be possible. This would, in principle, be valid for all cooperation instruments, but particularly for bilateral cooperation where the embassy can use its contextual expertise in the dialogue and civil society partnerships that have expanded over time.

The case study explores if and how the partner dialogue on HRBA has evolved over time for different cooperation instruments. It explores if the high ambition of project proposals with either a progressive or transformative HRBA has been subsequently pursued and, if not, how the MFA/embassies have addressed this in the discussions with partners.

Another guiding question has been if expectations on HRBA vary for different types of cooperation instruments, e.g., if specific conditions on deeper HRBA are posed to long-term partners, if there are common features between those partners, and how HRBA is being followed up and discussed.

In the inception phase, the team raised what could be learnt from the shift over time from a needs-based approach to a HRBA in relatively stable development contexts. This assumes that such a shift has taken place, that rights-based claims on accountability on policy compliance have evolved and that there is a distinct focus on the different roles of duty-bearers and rights-holders. Consequently, the case study discusses if such effects of HRBA integration in Tanzania and Mozambique can be traced, and if so, if this is something that is valid for all instruments reviewed in the case study or only for some. The study also examines if there are any HRBA principles that stand out as being more applied.

Finally, the case study looks at risks linked to the application of HRBA and the stronger focus on compliance with human rights in these two country contexts.

1.2 Overview of context

1.2.1 Tanzania

The United Republic of Tanzania has gone through some major shifts during the period under review. During former President John Magufuli's administration (2015-2021), civic space and press freedom became limited, coupled with authoritarian practices (Kontinen & Nguyahambi, 2023) and hate speech against lesbian, gay, bisexual, transgender, queer and intersex (LGBTQI) rights

(Powys Maurice, 2021). This development and how the Covid-19 pandemic was managed in the country caused great concerns in the international community, including among Tanzania's development partners. The civic space is rated as repressed by Civicus (Civicus, 2023) and categorised partly free by Freedom House (Freedom House, 2023a). A total of 272 journalists suffered press violations in the last decade, and between 2019 and 2021, three out of five journalists experienced some kind of limitation in their work, according to the Media Council of Tanzania (Mallimbo, n.d.). However, the situation is slowly improving.[1]

The former vice-president Samia Suhulu Hassan took over the presidency after Magufuli's death in March 2021. With her background in civil society (Zanzibar), there has been hope among development actors for an improved human rights situation. There has been some positive development, e.g., teenage mothers are allowed to return to school (November 2021), the ban on four newspapers was lifted last year in February, and the ban on political rallies was lifted in January 2023 (Nyeko, 2023). Tanzania was up for the Universal Periodic Review (UPR) at the Human Rights Council in November 2021 (OHCHR, 2022), and human rights progress was noted in many areas. However, same-sex relations remain prohibited under the Penal Code.

Consulted civil society partners in Tanzania also confirmed that they have witnessed a positive change. However, they were cautious in drawing any conclusions about the recent shifts in the environment for human rights defenders (KII, partner).

1.2.2 Finland's country strategy – Tanzania

Tanzania is relevant for the case study considering Finland's strong emphasis on active citizenship, strengthened democratic space and human rights. The country programme for development cooperation (MFA, 2021a) has an explicit focus on HRBA.

HRBA is relevant to the two impact areas of the programme: 1) Inclusive development through active citizenship and 2) Improved forest-based livelihoods and climate resilience. Four of the seven outcomes have expected outputs with explicit linkages to HRBA (legal frameworks, awareness of rights, capacity to advocate, human rights defenders protected, capacity of duty-bearers to fulfil their role, inclusion of people in vulnerable situations).

1.3 Mozambique

Mozambique is a deeply divided country politically and economically along geographical inequalities between the southern parts and central and north Mozambique. The country is among the ten poorest countries in the world, as per the Human Development Index (World Population Review, 2022). "

The stability in Mozambique has for a long time been challenged by the conflict between the ruling party, the Mozambique Liberation Front (Frelimo) and the Mozambican National Resistance Movement (RENAMO). A bloody civil war broke out between the two after the independence in 1975

---

1   Harassment of journalists has decreased from 41 reported cases in 2020, to 25 in 2021 and 17 in 2022, Hopes rise for press freedom in Tanzania as number of censured journalists falls https://www.theguardian.com/global-development/2023/jan/09/tanzania-press-freedom-violations-president-suluhu. Accessed 27.06.2023.

and lasted until the peace accord in 1992 when RENAMO turned into a political party. However, RENAMO rebels took up arms again in 2013, fighting the Frelimo government from RENAMO bases in central Mozambique. In 2017 a new conflict emerged in the province of Cabo Delgado in Northern Mozambique, with attacks from an Islamic State-linked group known as "Mashababos" or Al-Shabab. For two years, the country had two ongoing armed conflicts until a new peace agreement was reached in 2019 with the RENAMO rebels, that were disarmed the following year. Since then, the conflict in the North of Mozambique has deepened into a serious armed conflict between the Islamists and the government forces and a local militia (now authorised by the government since a bill was passed in the parliament last April (Clubofmozambique.com, 2022). Hundreds of thousands of people have been internally displaced due to the ongoing Islamist insurgency (Freedom House, 2023b). The conflict also has consequences for the neighbouring Mtwara region in Southeast Tanzania.

Human Rights Watch report on the situation in 2022 stated that:

> "*Government security forces across the country continued to use excessive force and arbitrary arrest and detention to restrict people's right to peacefully protest. Press freedom came under pressure as new laws limiting freedom of expression and the work of journalists were debated or passed in the national parliament. Police officers continued to be implicated in cases of kidnappings for ransom across the country.*" (Human Rights Watch, 2023)

Mozambique is rated as repressed by Civicus (Civicus, n.d.) and categorised partly free by Freedom House (Freedom House, 2023b). In February 2023, the government presented a draft law on the *Creation, Organization, and Operation of Nonprofit Organizations*, which is said to counteract money laundering and financing of terrorism, but if passed, would limit the association of freedom according to critique from civil society (IPI, n.d.).

The civic space and the human rights situation are also commented upon in the country strategy of Finland: *"…the human rights situation in the country remains challenging. The operational environment of civil society is marked by uncertainties; that of the media, while retaining a certain freedom of expression, has been deteriorating. The current political situation poses major risks for Mozambique's development as a pluralistic society based on the rule of law and democratic principles.*" (MFA, 2021c)

1.3.1 Finland's country strategy – Mozambique

The current country strategy for Mozambique (2021-2024) underlines the importance of strengthening the foundations of development and growth: peace, stability, human development, education, good governance, as well as societal resilience and equity (MFA, 2021c). Based on the promotion of human rights, rule of law, democracy, peace, freedom, tolerance and equality, the country programme aims to contribute to peacebuilding and conflict prevention, investment in youth and gender equality, building stronger institutions to foster resilience and equity as well as promoting economic partnerships. Finland has also supported the education sector for a long period. The current strategy focuses on quality and equity in education, which means that there is an embedded focus on HRBA principles. As will be discussed later on in the report, in the mid-term review of the strategy and the country programme, MFA has put a stronger focus on HRBA when selecting new partnerships (KII, MFA).

1.4   Socially accepted rights versus culturally sensitive issues

Some of the rights in focus in the reviewed interventions are based on broad political and social acceptance and are backed by existing legislation. Other examples in the sample challenge patriarchal norms and/or traditional cultural values, and human rights of specific groups of rights-holders are contested by society and might not be recognised by domestic legislation. The two country contexts share some similarities with barriers to the promotion of human rights that were identified in the case study on HRBA in headwinds, namely:

1. Traditional and patriarchal societies, where norms and values are based on religious/cultural beliefs, which also might be reflected in national legislation. Specifically challenging are rights referring to family law, bodily autonomy and sexuality, particularly for children and adolescents.

2. Misconceptions/lack of awareness of the legislation on the rights in focus among public/private service providers.

3. No recognition of the right/s by the state (e.g., rights of LGBTQI persons in Tanzania).

4. Recognition of the right/s by the state through a commitment to human rights frameworks but rights not domesticated (e.g., no law against child marriage before 2019 in Mozambique).

5. Rights are formally protected by the constitution or national legislation but not socially/culturally accepted by the public or by groups mobilising against agreed human rights, and therefore not fulfilled or protected by the authorities (e.g., comprehensive sexuality education, sexual abuse of minors, gender-based violence (GBV), land rights of indigenous people).

6. Conflicting dual legal systems, where local jurisdiction or practices are inconsistent with statutory legislation (e.g., child marriage in Tanzania).

This implies that partners promoting contested human rights in these two countries need to have a deep understanding of actors and structures working against the contested human rights that they promote and base their HRBA on relevant risk analyses and management.

1.5   Instruments and interventions in focus

The case study includes an in-depth analysis of some of the cooperation instruments (bilateral, multi-bi and civil society) involving five selected projects in Tanzania and a light touch analysis of three interventions (two directly funded by the Department for Africa and the Middle East[2] (call for proposal) and civil society instrument) in Tanzania and Mozambique. The reviewed interventions are funded by bilateral (3), multi-bi (1), and civil society (4) (**Table 1**). In addition, data shared by the embassy in Mozambique on recent grant decisions has also informed the analysis.

---

2   The embassy clarified the two national CSOs responded to a call for proposals organized by the MFA financed by the Department for Africa and the Middle East.

Forestry and Value Chains Development (**FORVAC**), is a project focusing on community forest management, with a strong emphasis on community members and their livelihoods. It is managed and implemented by FCG International Ltd in cooperation with the Tanzanian government and sub-contracted service providers, as well as the community forest committees. The multi-bi project **Chaguo Langu Haki Yangu 'My Rights My Choices'** is implemented by United Nations Populations Fund (UNFPA) and its civil society and governmental partners, focusing on GBV, bodily rights and Sexual and Reproductive Health and Rights (SRHR), with a focus on women and girls with disabilities.

Five interventions in Tanzania and one in Mozambique are implemented by civil society organisations (CSO), four through the civil society instrument and two through a call for proposal with budget from the MFA (bilateral).

The direct partners to the embassy in Tanzania are two human rights expert CSOs working both at local and national levels on various human rights: 1) **Elections and human rights in Tanzania 2019–2021/ Core support to Legal and Human Rights Centre in Tanzania (LHRC)** implemented by LHRC. 2) **Strengthening accountability** implemented by Twaweza East Africa[3], a regional project covering three East African countries[4].

The three interventions in Tanzania supported by the civil society instrument are: **Empowered Girls Speak Out - Securing education of girls through sports in secondary schools and vocational** and **Empowering the Boys' Societies Through Sports and Health Education,** both implemented by Liikunnan kehitysyhteistyö (Liike) ry together with Sports Development Agency (SDA), and **Youth Agency in Mufindi** implemented by Deaconess Institute in Helsinki and Foxes Community and Wildlife Conservation (FCWC).

The fourth intervention supported by the civil society instrument, implemented in Mozambique by Plan International Finland in partnership with Plan Mozambique/Associação Mahlahle is **Vutomi - My Life,** project part of **My Body My Future project,** second phase.

---

3   Referred to as Twaweza in the report.

4   Twaweza's headquarter is in Dar es Salaam, the embassy only supports project activities in Tanzania.

Table 1. Sample of the case study - partnerships

INSTRUMENT	INTERVENTION NAME	COUNTRY	IMPLEMENTED BY
Bilateral	Forestry and Value Chains Development FORVAC	Tanzania	FCG International Ltd
Bilateral	Elections and human rights in Tanzania 2019–2021./ Core support to LHRC	Tanzania	LHRC
Bilateral	Strengthening accountability	Tanzania	Twaweza East Africa
Multilateral (multi-bi)	Chaguo Langu Haki Yangu 'My Rights My Choices' Protecting the Rights and Choices of Women and Girls, particularly Women and Girls with Disabilities in Tanzania	Tanzania	UNFPA
CSO	Empowered Girls Speak Out - Securing education of girls through sports in secondary schools and vocational.	Tanzania	Liike ry/SDA
CSO	Empowering the Boys' Societies Through Sports and Health Education	Tanzania	Liikunnan kehitysyhteistyö Liike ry/SDA
CSO	Youth Agency in Mufindi	Tanzania	Deaconess Institute in Helsinki/FCWC
CSO	Vutomi - My Life, a project part of My Body My Future	Mozambique	Plan International Finland Plan Mozambique / Associação Mahlahle

Source: Evaluation team

The reviewed interventions focus on SRHR and GBV, including harmful practices; access to education; access to justice; freedom of speech and access to information, livelihoods; local ownership of natural resources, among other issues.

2 Findings

2.1 General issues of direct salience to the case study focus

Finding 1: The embassies have been proactive in the dialogue on HRBA with multilateral and bilateral partners (while this was not the case in the dialogue with the CSO partners' experts on human rights).

The documented dialogue with the stakeholders in the FORVAC project and with UNFPA, as well as interviews with MFA and partner representatives of both projects, demonstrate that the embassy, as well as thematic advisors from MFA in Helsinki, were proactive in discussing the integration of HRBA with the managers and other key stakeholders of these two interventions. Apart from an overall focus of the approach, specific attention had been paid to the rights and inclusion of persons with disabilities.

In the case of the UNFPA project, this resulted in a major shift of the initial project proposal during the extended inception phase to have a specific focus on women and girls. "*The revision was done together with a strong engagement from the embassy and the MFA, including disability expertise from the MFA. The head of cooperation was very hands-on and present in the process* ...". (KII, partner)

The review of MFA intervention-related internal documents on the FORVAC project demonstrates MFA's strong focus on HRBA, calling for an improved integration of the approach in general and in particular to the principles of inclusiveness and non-discrimination of persons in vulnerable positions and the participation in decision making. The project management is asked to collaborate with OPD organisations and seek their advice for the inclusion of persons with disabilities. There are also comments how indicators could include cross-cutting objectives and on the need to actively monitor results and learn from the experiences of addressing these.

As a part of the ERET, the FORVAC project was reviewed (Remme, Lukumbuzya, et al., 2022) in 2022, and the same consultants conducted a Socio-Economic Assessment of Poverty, Vulnerability and Gender (Remme, Kingazi, et al., 2022) of the population in the targeted communities. These two products highlight HRBA and contribute to developing the understanding of HRBA in the project team. The consultants also developed a comprehensive annex to the updated project document (October 2022) as a result of the socio-economic study. The annex contains conclusions and recommendations related to rights-based principles. However, this useful tool did not impact the annual project plan for 2023. The case study notes that the embassy has continuously stressed the importance of strengthening HRBA, in general, and in relation to persons with disability in particular. (See further finding 8).

The embassy in Mozambique shared that they had made a deliberate shift to more HRBA progressive & transformative interventions as part of the mid-term review of the country strategy. The assessment of HRBA has been key in new support, ensuring that partners focus more on both rights-holders and duty-bearers, with emphasis on gender equality, persons with disabilities, civic participation and accountability claims (KII, partner). The previous focus on education and good

governance is still valid, but the shift means that the interventions analysed do not mainly reflect the strengthening of duty-bearers but demonstrate a more holistic HRBA, also stressing the importance of the capacities of rights-holders. Among the new grants are UNFPA SRHR intervention (assessed as transformative), a child grant with a focus on social protection implemented by United Nations Children's Fund (UNICEF) and International Labour Organization (ILO) (progressive), and an accountability programme led by a national CSO consortium (transformative) (KII, partner).

Finding 2: HRBA has not explicitly been part of the dialogue with partners holding human rights expertise.

These CSO partners focus on a broad range of human rights, and as such, they plan and report on processes aiming at improving human rights situations in general or for specific groups. The focus of the dialogue is on the achieved changes, and as such, there is obviously a focus on human rights outcomes. However, in contrast to the above, the two civil society partners, Twaweza and LHRC, shared that the dialogue with the embassy around proposals or reports had not had any focus on how they apply HRBA (KII, partner). This was confirmed by the embassy. By not focusing on the practice of the two expert organisations, potentially valuable lessons were not captured or documented by the MFA.

Having said that, LHRC emphasised that the request from several of its donors, including Finland, to deepen the gender perspective of the organisation towards a more gender transformative approach (GTA) had led to a stronger and more deliberate application of the principles of HRBA (KII, partner).

Finding 3: The reviewed sample of interventions illustrates a strong focus on inclusion of persons with disabilities and gender equality based on the rights-based principles of non-discrimination, participation and access to information (transparency).

All reviewed interventions had to some or large extent, focused on persons with disabilities. The inclusion of persons with disabilities is mentioned in all project documents/proposals, and the situation of persons with disabilities is highlighted in the context analysis of some of them. As already indicated above, two of the interventions in Tanzania supported by the embassy, developed their approach to persons with disabilities through a close dialogue with the embassy and technical advice from the MFA in Helsinki (**UNFPA**), and in the case of the **FORVAC** project also with the help of the external review (Remme, Lukumbuzya, et al., 2022) of the project and the study socio-economic assessment (Remme, Kingazi, et al., 2022).

The interventions have in common that they mainly focus on the inclusion of persons with disabilities in activities led by organisations (CSOs, contracted services, private rehabilitation and education service providers, governmental institutions, and service providers), working for persons with disabilities, not led by persons with disabilities themselves. In fact, for several of the **partners of UNFPA**, working with and for women and girls with disabilities was new. That was also the case of the CSO project **Youth Agency in Mufindi,** which had a particular focus on access to basic education and rehabilitation of children with disabilities. As the coordinator said, "*They are learning about disabilities while implementing*".

Both CSO partners supported by the bilateral instrument also report on specific results from their focus on the rights of persons with disabilities. LHRC's *Aminia Usawa* campaign, reaching approximately 3 million people, raised awareness of the rights of women, children and persons with disabilities, as well as the legal framework for these rights. The centre contributed to the establishment of 80 new persons with disabilities Committees at the Local Government Authority (LGA) level, 1,000 new persons with disabilities committees, trained and increased knowledge of justice

actors on rights and issues affecting women, children and persons with disabilities, and developed a joint action plan with nine ministries to address the challenges facing women, children, and persons with disabilities. The interviewed Finnish CSOs also confirmed that the dialogue with and instructions from the MFA had encouraged them to further strengthen their focus on the rights and inclusion of persons with disabilities.

Based on the project documentation, the CCO of gender equality is likewise salient in all reviewed interventions, either as an overall objective of the projects or as a significant objective. They mainly address the rights of women and girls and changes in social gender norms. The promotion of gender equality and the inclusion of persons with disabilities are consistent with both the HRBA and Finland's CCOs as well as the rights-based principles of non-discrimination and active and meaningful participation of excluded rights-holders, but while the promotion of gender equality is a common criterion among many other donors, disability rights are not. One effect of being a partner of Finland's MFA is the fact that the implementing partners pay special attention to persons with disabilities.

As raised in the case study on disability, there is an overlap between the HRBA principles and the CCOs, without a clear distinction between the two. It is thus not always clear if the inclusion of persons with disabilities, or of focus on women and girls, is a response by the implementing partner to a more systemic approach of HRBA or to the demand to integrate CCOs.

The promotion of gender equality, as already mentioned, is primarily focused on women and girls, with a few exceptions. Plan International Finland and Liike/SDA also focus on the gender awareness of boys and how to encourage them to adhere to another way of being a man in their local contexts than traditional masculinity. Plan has a gender-transformative approach to SRHR (Plan International Finland , 2021):

> "*The approach, therefore, makes specific contributions to empower individuals and address norms at the community level. To do this, the approach uses gender transformative and human-rights-based approaches that counter stigma and discrimination towards the most vulnerable, including adolescents and young people with disabilities. […] … gender transformative programming which aims to transform unequal gender power relations. Gender inequalities are the root of many interlinked violations of children, adolescents and youth. Adolescents have little power and status compared to adults. Therefore, gender transformative programming works with individual girls and boys, their families and communities, and social and political institutions. A gender transformative approach goes beyond addressing "symptoms" to explicitly tackle the root causes of gender inequality, particularly unequal gender power relations, discriminatory social norms and systems, structures, policies and practices. It improves the daily condition of girls while advancing their position and value in society.*"

Apart from women and girls, with or without disabilities, in different situations and conditions, and rural rights-holders, few other groups exposed to discrimination are targeted in the projects. The case study shows a rather narrow understanding of the non-discrimination principle to mainly concern persons with disabilities inclusion, young age, sex/gender, and in general terms, rights-holders in poverty. Ethnicity, religion, or other social categories are seldom identified as possible factors influencing access to services, citizens' rights, voice, or participation in development processes.

Having said that, LHRC works with paralegals "to enhance and increase quality access to justice particularly for the indigent community to include poor women, children, persons with disabilities, elderly and other marginalised groups."

The second phase of the project implemented in Mozambique also focuses on LGBTQI issues (capacity building of Plan Mozambique staff and advocacy work at the national level) (KII, partner) through a new strategic partnership with Lambda[5], the principal lesbian, gay, bisexual and transgender (LGBT)[6] organisation in the country. None of the interventions in Tanzania mentions the rights of LGBTQI persons in their project/programme documents, though one respondent made a comment on the difficulties in defending their rights in a country where same-sex relations are criminalised and where the former president held hate speech against gay persons (see 2.1 above).

Finding 4: There is a large variation in how HRBA is applied and self-assessed. While all reviewed interventions assessed by the MFA as progressive have some components of HRBA, there are examples that do not even fully comply with the criteria for a sensitive HRBA, while others include transformative aspects.

The case study shows a rather big variation in knowledge of HRBA and rights-based principles, spanning no knowledge of what HRBA is about to a transformative approach (**Table 2**). In one case, the intervention had been rated as progressive in the MFA assessment, mainly due to the focus on children with disabilities. However, regarding children with disabilities, the project focuses on access to basic education and access to rehabilitation. The other component of the project, skills training of marginalised young persons, does currently not involve any adolescents or young adults with disabilities. The local charity-oriented CSO was not familiar with HRBA but had a participatory and inclusive approach and did important work in raising awareness of community social protection committees, parents, and other caretakers on the rights of children with disabilities to education and rehabilitation. There were thus traits of a rights-based approach.

Table 2 Assessment of the level of HRBA implementation of the sample interventions by funding instrument category

COOPERATION INSTRUMENT	SENSITIVE	PROGRESSIVE	TRANSFORMATIVE
Bilateral (3 interventions)	Attention to *do no harm*, HR principles applied (3) Attention to human rights risks and/or principles (2)	Strengthening capacities of rights-holders, adherence to human rights principles (3) Explicit aim to contribute to realization of human rights (3)	Addressing root causes of discrimination (1)
Multilateral (multi-bi) (1 intervention)	Attention to *do no harm*, HR principles applied (1) Attention to human rights risks and/or principles (1)	Strengthening capacities of rights-holders, and duty-bearers, adherence to human rights principles (1) Explicit aim to contribute to realization of human rights (1)	Addressing root causes of discrimination (1)
Civil society (4 interventions)	Attention to *do no harm*, HR principles applied (3) Attention to human rights risks and/or principles (1)	Strengthening capacities of rights-holders, and duty-bearers, adherence to human rights principles (3) Explicit aim to contribute to realization of human rights (4)	Addressing root causes of discrimination (3)

Source: Evaluation team

---

5   Mozambique Association for Sexual Minority Rights.

6   LAMBDA uses LGBT, Queer or Intersex are not included in the description of the organisation.

The MFA HRBA guidance note stipulates that an intervention classified as sensitive should be based on basic human rights assessment and that human rights principles should guide the project cycle. This is also mandatory for the next level, and in addition, to be progressive, the needs, concerns, and capacities of rights-holders and duty-bearers should be addressed, including human rights results, and be rights-based in its processes. The mentioned intervention only in part meets the criteria on the sensitive and progressive levels. This is not to single out one project but to illustrate one of the case study examples where the assessment does not fully adhere to the guidance note.

Another example is the FORVAC project that, at first, was rated as sensitive but altered to progressive HRBA (MFA & Ministry of Natural Resources and Tourism, Tanzania, 2019). The above-mentioned external Mid-Term Review (MTR) and socio-economic study has resulted in a more developed HRBA, but in many aspects, the bilateral project still remains at a sensitive level (Remme, Kingazi, et al., 2022; Remme, Lukumbuzya, et al., 2022).

Regardless of the level of understanding and application, inclusion is seen as important by all reviewed interventions, and participatory approaches are used, particularly in projects focusing on children and young people, like by the CSO partners to UNFPA, the two education projects implemented by SDA in the Mtwara region, and the Youth Agency project in Mufindi, where unemployed adolescents and young women and men from distant rural communities are improving their livelihood through skills training, and children with disabilities have access to education and rehabilitation. The SRHR project in Mozambique is built on a highly participatory and inclusive approach to young girls and is a transformative example focusing on gender power relations and the root causes of discrimination.

All interventions, not only the civil society organisations, have a stronger focus on building capacities and awareness of rights-holders than on duty-bearers capacities to understand HRBA and what it entails for their different roles.

The two human rights organisations supported by the Department for Africa and the Middle East represent one transformative and one progressive example and are the interventions that have the strongest focus on accountability of duty-bearers and the most in-depth analysis of how duty-bearers can be approached, Twaweza reflected that they learnt the importance to engage both the technocrats and politicians at the local and national levels due to power dynamics and personalities, but that their individual motivations and barriers need to be considered. They saw it particularly key to analyse how to encourage members of parliament and local officials to influence systems change or individual, longer-term attitudinal shifts.

LHRC conducts strategic litigation and regularly analyses laws to identify gaps and obtain substance for engagement with duty-bearers for legal and policy reforms (Twaweza, 2021).

Finding 5: Access to SRH(R) and legal services are used as entry points for awareness raising of both rights-holders and duty-bearers.

As in the case studies of HRBA in conflict settings and headwinds, this case study also caters to several examples across the aid modalities of how legal and different forms of SRH(R) services provide the implementing organisations to reach out to both rights-holders and duty-bearers on human rights education and awareness on discriminatory attitudes and behaviours. These examples include the work of the paralegals in the two interventions supported by the Department for Africa and the Middle East and the four projects under the civil society instrument.

What stands out as different from the Headwinds case study is that the legal aid is provided to a diverse range of issues, not with a focus on contested rights (or at least not too controversial rights). SRHR is also controversial in these two country contexts, particularly in rural settings and contested both by traditional cultural values and religious beliefs. While the headwind cases had a deliberate focus on building alliances with religious leaders, this is, however, less salient in these long-term development cooperation contexts.

2.2   Findings regarding effectiveness

The effectiveness of the application of HRBA concerns both improved human rights and the Rule of Law, as well as how rights-based principles are practised by implementing partners. HRBA is about achieving a better human rights situation as an end goal, but also contributing to a better understanding among rights-holders and duty-bearers on how the practice of HRBA lays the ground for the respect and fulfilment of human rights. These two dimensions of results from HRBA should be considered when discussing effectiveness as well as the added value of the approach. The results under the first dimension are presented here, while process-oriented results are discussed under added value. The first sub-chapter presents the effects of the human rights focus and the application of HRBA at societal and at individual/target group levels.

2.2.1   Contribution to the fulfilment of human rights

Outcomes with the potential to lead to impact at the societal level

Finding 6: Results of Finland's contribution at the societal level span from attitude and behaviour shifts among formal and moral duty-bearers to increased participation in elections and legal reforms. They also involve increased access to justice, higher reporting rates on human rights abuses, and disability-inclusive GBV and SRHR programme models.

- **Access to legal services for a large number of rights-holders through paralegals and an increase in reporting human rights abuses**

The **legal aid services LHRC** contributes to increased access to justice and the Rule of Law all over Tanzania for rights-holders that otherwise would not have had legal support. Even if the outcomes are at an individual level, the scale of the outreach speaks for assessing the change as having an effect at the societal level. LHRC also reported on an **increase in reporting of human rights violations** and issues, including GBV, in 2020 to police stations and by the media as a result of capacity-building human rights monitors. The organisation also contributed to increased awareness among local authorities and journalists on **human rights and business** issues.

- **Traditional leaders accept the shift to rights-based sexual and reproductive health (SRH) information in initiation rites**

The partnership between Finnish LiiKe and SDA in the Mtwara region of Tanzania demonstrates an outcome that is already impacting the lives of girls. The two civil society projects aim to secure

access to education for girls but also boys.[7] The change in focus here is on a more structural level with the potential for larger societal effects. The projects have targeted traditional leaders of initiation rites built on harmful practices leading to both girls and boys dropping out of school, girls being sexually abused by adult men, and young adolescent boys believing they are men and no longer need to stay in school. The aim has been to alter traditional messages of initiation to align with a more rights-based approach to sexuality and bodily autonomy. These leaders are targeted through community facilitation groups together with other local duty-bearers such as education officers, religious leaders and teachers, among others (KII, partner).

This long-term strategy has resulted in an increasing acceptance among female traditional initiation leaders and recently among male traditional leaders of an SRH manual developed by the project, approved by the Ministry of Education through close and strategic dialogue over the years. The traditional leaders have committed to using the SRH manual and shifting their harmful practices and have also established a new organisation to ensure the message regarding safe initiations is communicated to all their fellows (based on annual reports and KII, partner). Though local in its nature, the outcome is to be considered transformative in how it addresses root causes of discrimination, with the potential to lead the way for similar practices in the region (for example, in the north of Mozambique).

This example is a showcase of the importance of deep knowledge of the local context, established partnerships and the capacity to bring lessons learned from previous projects into local and national advocacy. Though a small CSO, this Finnish partner to the MFA, benefiting from the civil society instrument, has been active in Tanzania for a long time, which is also demonstrated in the good results of increased access to education through an alternative model discussed below.

- **The policy response to citizens' polls – access to information and reduction of taxation of mobile transactions affecting primarily low-income citizens**

Twaweza conducts citizens' surveys (called Sauti za Wananchi) to raise awareness among rights-holders and influence politics. The surveys were stopped by amendments to the Statistics Act in September 2018 that essentially banned the independent collection and public dissemination of any statistical information (KII, partner, annual reports). Through direct advocacy and engagement with national and international partners, Twaweza contributed to a new amendment of the Statistics Act (2019), reversing restrictions on data collection and dissemination (The Citizen, 2019).

When the Sauti za Wananchi was conducted again in 2022, data was collected about people's perceptions of the economy and a mobile money levy was introduced in 2021. The data was presented to the Ministry of Finance, who asked Twaweza to provide a more balanced perspective on the levy. A new data collection tool was generated as requested. Now statistics government officials expressed concern about the data release, but Twaweza launched the survey results anyhow in August 2022 based on the project documentation. The venue of the event was surrounded by riot police, but the launch proceeded uninterrupted. There were attempts to discredit the results, and a distorted version appeared. However, despite the negative position of the government at first, information on the use of funds collected from the levy was eventually shared (the survey data showed that knowing how it was spent made citizens express a greater willingness to pay the levy) and, in October 2022, **the levy was again revised downwards and abolished for certain transactions.**

---

7   Project documents. Through a focus on sports to attract interest in school, through physical activities improve academic results, and increase awareness among school children with or without disabilities through active participation in planning and implementing of events. Results on more girls in school and inclusion of both boys and girls with disabilities are discussed below.

- **Citizens increasingly participate in elections**

LHRC also has a national outreach to citizens. About half of the population of Tanzania was reached in 2019 with human rights awareness raising through mainstream, digital and community media, based on the project documention. LHRC has a project on civic space and civic education (KII, partner).

- **Core support to CSOs has enabled a focus on accountability also in times of shrinking space**

The two partners to the embassy in Tanzania with long experience in promoting human rights and a deep understanding of the political economy and how accountability can also be claimed in a challenging context. The embassy has selected experienced actors and demonstrated trust in them by providing core support to their strategy implantation. They are both bold partners and shared in the KIIs that the support from the international community has been a major factor in the possibility of continuing with human rights claims in difficult times (KII, partner). The assumption that long experience, presence and partnership facilitate a more comprehensive HRBA is confirmed in this case.

Finding 7: The UNFPA project has the potential to set an example of a more inclusive agenda for prevention and response to gender-based violence.

It is too early to assess the outcomes of the UNFPA project included in the sample. However, through its shift to a more comprehensive design of inclusion of women and girls with disabilities, putting them at the core of the intervention rather than adding persons with disabilities to the list of different lived realities of women and girls, this multi-bi intervention is setting an example (UNFPA, 2021) (KII, partner). The programme is implemented in different regions of Tanzania with the potential to be spread as a model to combat GBV and strengthen SRHR of all women and girls. As highlighted in the previous chapter, this is an example of the impact in-depth dialogue between the MFA/embassy and a partner can have on HRBA design.

Outcomes at local and individual (rights-holders and service providers) level

Finding 8: Results with Finland's contribution at the local and individual level include access to education, livelihood opportunities, safe and youth friendly SRH spaces, and attitude and behaviour shifts among local duty-bearers to end discrimination against children with disabilities.

- **Local duty-bearers have shifted their attitudes toward children with disabilities and increased their understanding of the rights of persons with disabilities.**

The Youth Agency project in Mufindi, working with remote rural communities in an area of forestry and large tea plantations, provides children with disabilities (ages 6-13) from 16 communities with rehabilitation opportunities, basic education in an accessible school environment at the training centre of the organisation. Based on the project documention, these services are not provided by the schools in the area. In addition to addressing the needs of the children, the project has built capacities of both village child protection committees (VCPC) (which consist of child welfare offices, local staff, village elders and other local community members), parents and the project staff on the rights and needs of children with disabilities. The project management has seen a change in the

attitudes of the VCPC members and a greater understanding of how parents and the community can support children with disabilities. However, this work is carried out by project staff with no prior experience from working on disability rights and without support from any local Organisation of Persons with Disabilities (OPD)[8]. This raises questions about the capacity of the organisation to monitor and maintain the effects.

> "*It is not easy for one with no training on persons with disabilities rights to consider them during identification (of children to be targeted by the project)*." (KII, partner)

- **Demands from young rights-holders are increasing, and shifts in norms and increased capacities are noted among service providers thanks to targeted training.**

Plan Mozambique works with a comprehensive SRHR approach claiming young people's access to quality health services with privacy and youth-friendly spaces and is part of SRHR networks and engages directly in advocacy work, through partners and through direct claims raised by young rights-holders trained through the project. There is a collaboration with the ministries of Gender, Health and Education. The local partner Associação Mahlahle targets service providers with training and engages in dialogue with religious leaders at the local and provincial levels (KII, partner). Results from the first phase of the project indicate that young SRHR champions are increasingly taking action to promote SRHR questions within their communities (Plan International Finland, 2021). The new phase builds on the same logic. The project works with community-based counsellors (Massungukates and Massungudotas) sharing knowledge about SRHR issues aiming at transforming harmful social norms through community dialogue. Plan Mozambique reports that men and women are "*showing positive attitudes towards the need to bring change to these norms*" (Plan International Finland, 2021).

- **Access to education for marginalised children**

  – Children with disabilities now have access to education and rehabilitation (Mufindi, Tanzania).

  – Girls and boys remain in school and have improved their academic results (Mtwara region, Tanzania).

As mentioned above, both the SDA projects and the Youth Agency project have contributed to increasing access to education at the local level for targeted rights-holders with and without disabilities (SDA). Both projects target children that have had limited or no access to education, and the SDA project has focused on maintaining primarily girls in school but also boys. While the first project targets only children with disabilities (CWD) and provides education in a CSO-led school, the project in the Mtwara region works with public schools providing extra-curricula activities. Both projects have contributed to access to education by previously excluded children or children at risk of dropping out of school.

- **Livelihood improvements**

  – Empowered women rights-holders have increased their participation in community-based forest management in their communities through the project.

  – Communities and individual community members have gained economic empowerment through the project.

---

8   The desk review showed that an OPD partner to the Finnish CSO would act as a supporting expert. Programme document.

Both FORVAC and the Youth Agency report on increased skills and income-generating opportunities (KII, partner). Both interventions have a focus on forestry related income generating activities, and while FORVAC mainly focuses on self-employment and community-based micro-enterprises for both men and women with targeted results overall on track, the project in Mufindi aims at preparing young marginalised women in the first place, but also men, to be employable in local forest companies. The FORVAC project also demonstrates increased voice and participation of women in forest management (KII, partner). The activities aiming at women's empowerment and leadership skills have rendered good results considering the social and cultural barriers in the local context, something that was verified in a recent gender pilot study (KII, partner).

2.2.2   Findings related to added value

Finding 9: The main added value of HRBA in long-term development cooperation is rights-holder-driven long-term development cooperation agendas, constructive dialogue with duty-bearers based on participatory and inclusive human rights monitoring and evidence-based data collection.

Based on the listed findings on effectiveness above, the main feature of the added value of HRBA in Finland's long-term development cooperation in addition to contribute to the achievement of human rights goals, can be summarised as follows. The application of the rights-based principles in project implementation with a focus on meaningful and inclusive participation helps the organisation to keep its "ears to the ground" and understand at what level it is possible to engage in constructive dialogue with duty-bearers. HRBA adds value in its demand to focus on the capacity to understand and embrace the approach among both among rights-holder and duty-bearers. In this sense, bilateral and multi-bi projects where duty-bearers are direct partners to the intervention can play a key role in maintaining focus on the duty-bearers' roles and responsibilities related to accountability and transparency. However, the added value depends on a capacity development of duty-bearers in bilateral and multi-bi projects that explicitly address the rights-based principles.

It also ensures that the human rights in focus are understood from the perspective of different rights-holders and how the lack of freedoms, rights, services or protection impacts their life differently. The use of participatory monitoring where affected rights-holders contribute to the collected evidence-based data increases the legitimacy of accountability claims.

2.2.3   Process results

This section discusses results from the application of rights-based principles in project management and implementation. The practice of transparent, accountable, participatory, and inclusive project design and management has also rendered results and can be seen as an added value of the application of HRBA. The interventions rated as transformative provide several process-oriented results.

Finding 10: Transformative approach resulting in strategic partnerships, deepening ownership principles and participatory human rights monitoring.

The previous phase of the SRHR project in Mozambique managed, for example, a dual awareness-raising approach to SRHR and disability rights. Representatives of local OPDs were trained on inclusive SRHR, and parents and, community members, religious and community leaders were

trained on the rights of persons with disabilities. In cooperation with regional authorities, a survey of young people with disabilities and an accessibility assessment at four health centres informed local advocacy work coupled with training on legally based disability work to the authorities (Plan International Finland, 2021). Furthermore, Plan International Finland describes in its global programme My Body My Future Phase 2 how rights-based principles are put into practice in the different partnerships (Plan International Finland, 2021)[9] and how the principles have guided the project and monitoring design:

> "*Partners, including OPDs, have contributed to analysis of barriers to the inclusion of marginalised groups. […] The [monitoring and evaluation] M&E system utilises a participatory approach - the project stakeholders (particularly the primary target groups) will participate actively in the M&E system, including data collection and providing feedback to ensure accountability to beneficiaries. This approach will help to build a shared understanding of project goals, results, promote learning, and facilitate understanding of the links between inputs and outcomes. An information sharing and accountability system will be in place in target intervention areas. The project target groups will be informed about the project's objectives, how they can get involved in the project and about their right to voice their feedback, including their complaints.*" (Plan International Finland, 2021)

As part of their strategic plan, LHRC in Tanzania establishes human rights clubs to increase the knowledge of children's rights and violence against women and children among rights-holders. As described in the project document, it is then the members of these clubs that monitor and report human rights abuses, in addition to the work of trained paralegal units and the reporting of human rights issues by journalists trained by the centre. This combined and comprehensive participatory approach to human rights monitoring and reporting contributes to the legitimacy of LHRC advocacy work and accountability claims.

2.3   Findings regarding risk management

Finding 11. Most partners demonstrated low to medium awareness of risks related to the application of HRBA and human rights language.

Out of the eight interventions in the sample, three stand out as risk aware related to the application of HRBA, the two human rights expert organisations in Tanzania supported by the Department for Africa and the Middle East, and Plan. Plan's risk matrix includes, for example, the following risks, measures and comments:

> "*Rejection of SRHR messaging by the general audience, Cultural adaptation to key SRHR messages. SRHR is a culturally sensitive topic and needs to be contextualised to each setting. Finding a balance between cultural adaptation and avoiding introducing difficult topics may be difficult. [..] Exclusions of girls by families and communities or backlash on girls' rights due to altered community dynamics based on increased empowerment and awareness of girls on their SRH rights and opportunities.*" (Plan International Finland, 2021)

---

9   Programme document. "We recognize that working on equal terms does not happen by default in partnerships but requires continuous effort to balance how power is distributed due to differences in resources, capacity, influence and experience. When working with the explicit objective of strengthening civil society such as in this programme, these principles therefore become not just a means, but a programme result.[…] including building our own accountability towards partners…"

The fact that LHRC is so well established and supported by many donors has enabled the organisation to continue to address human rights in an open and direct manner despite shrinking space. LHRC has deliberately chosen not to adapt language or approach[10] while still being aware of security issues. That is not the same for some smaller CSOs, but LHRC has support from its development partners through its recognition at the regional level. Still, the LHRC was forced to improve their security thinking and risk management during the former government (KII, partner).

A factor that makes a difference in a challenging environment, according to LHRC, is to work in coalitions with other CSOs. That requires flexibility in the choice of methods to accommodate the different allies, but of course, without losing sight of the issues (KII, partner).

---

10   The only limitation is the possibility to defend LGBTQI rights, which has not been included in the open approach of the work.

3 Conclusions

All partners based in Finland and in direct agreement with the embassy were **well aware of the HRBA guidelines and the requirements of having at least a sensitive level of HRBA**. **The focus** continues to be mainly on **the awareness and capacities of rights-holders**, aiming at rights-holders becoming rights advocates/demanding accountability from mainly local duty-bearer structures. The long experience in the country has not resulted in an equally strong focus on building the capacity of duty-bearers. (See findings 1 and 4.)

The organisations with internal policies or guidelines on HRBA and other transformative perspectives (e.g., on gender) proved to have the most explicit dialogue on how to put rights-based principles into practice and focus on building the capacities of implementing staff. Partners depending only on the instructions from the MFA thus seem to be less rooted in HRBA. **Having experienced internal policy discussions on HRBA and transformative approaches and/or having access to own guidelines seems to be a success factor for moving towards a more progressive or transformative HRBA.** (See finding 7 and 10)

MFA has been supportive to partner's HRBA, particularly in strengthening the inclusion of persons with disabilities. The selection of an **already HRBA-committed partner has not resulted in any deeper dialogue on HRBA practices. There seems to have been no structured follow-up of the HRBA in the partner dialogue or specific questions to the annual reporting. This is a lost opportunity to learn from good practices or detect a lack of the same.** (See findings 2 and 3.)

The **degree of boldness** in national human rights advocacy in situations of shrinking civic space is very much **related to broad donor cooperation**, as well as **alliance building**. **This calls for continuous support for strategic advocacy work through coalitions as well as donor coordination,** specifically on how to promote the application of HRBA. (See finding 6.)

So did the experience and long-term knowledge from the context matter? Yes, it did where this **knowledge was rooted in the staff designing the interventions**, as in the projects on initiation rites and Plan's local SRHR work at the local and national level, or in the shift at the embassy in Maputo to a more articulated HRBA focus when selecting new partnerships. But in the cases where **project management was not familiar with the specific context, it was rather other factors that influenced how HRBA was considered**, as in the case of UNFPA, where the strong commitment at the MFA/embassy deepened the dialogue on persons with disabilities and open for a longer inception phase that enabled UNFPA to embark on a more participatory design process. Or in the case of FORVAC where the external consultants conducting the MTR and the socio-economic analysis became an instrumental resource to the FORVAC team. (See findings 1, 4,5, 6, 7, and 8)

The case study shows that **capitalising on the collective experience that exists among Finnish actors working in these two country contexts does not come automatically**. Without a systematic approach where lessons learned from previous interventions, the design of new interventions will not be informed about how and what human rights can be promoted in these contexts and how HRBA can best be applied. (See findings 2, 10 and 11.)

The issue of stability enabling the practice of HRBA was one of the assumptions made during the inception phase. This does not come out clearly in the case study. This can partly be explained by the fact that both Tanzania and Mozambique have not been so stable during the reviewed period, both from a human rights perspective and security-wise. What seems to be **more important is what rights are in focus and how deliberate the implementing actor is in addressing the human rights situation in the country**. It is not possible to draw any conclusions between the degree of HRBA and long-term development cooperation based on the sample. (See findings 7,8 ad 10.)

A shift over time was possible to see both between different project phases and within the same project period. Finnish CSOs are increasingly more aware of HRBA, but at the same time, they also implement needs-based interventions parallelly to work based on HRBA. **The case study does not give any clear indications if MFA's partner dialogue on HRBA has evolved over time for different cooperation instruments**. What is evident is that **deliberate efforts to enhance the inclusion of persons with disabilities are rendering good results**. (See findings 3 and 9).

No specific conditions were detected for a deeper HRBA by long-term partners. Compared to the other case studies, it does not seem that the MFA poses higher expectations on HRBA to partners in contexts like Tanzania or Mozambique than in transition or conflict contexts. Once again, it seems to be more related to what human rights issues are in focus. (See findings 2 and 4.)

Finally, project proposals with either a **progressive**[11] **or transformative HRBA did maintain the same level of ambition throughout the periods reviewed or became more transformative between phases,** like in the case of Plan International Finland and UNFPA. (See findings 4 a and 10.)

---

11   Where the evaluation team agrees with the rating of the project as progressive.

4   Lessons learnt

1. **Partners' knowledge of how to discuss HRBA during project design is key**. Lack of understanding of both what HRBA entails and of the human rights situation negatively impacts human rights ambitions. **The opportunity to tailor rights-based practices to the local context and the rights issue/s is overlooked when the context is not thoroughly analysed**.

    Without in-depth discussions on what is actually possible to push for, there is a risk that an overly cautious approach to human rights demands neglects available methods and channels on how to claim accountability of different duty-bearers. Both this case study and the ones on HRBA in headwinds and HRBA in conflict settings demonstrate that it is possible to do HRBA both in challenging contexts and on controversial rights. A first threshold for long-term development cooperation contexts should therefore be in the assessment of the analysis of the human rights situation.

    - Has the potential partner sufficient understanding of what is possible from a HRBA?

    - Could the partner liaise with other MFA partners to deepen its approach to human rights?

    - Could more guidance be provided from the MFA or through the strategic partners on how to further strengthen the HRBA capacity of smaller CSO partners, private sector actors, or other actors in sectors that have paid little attention to rights-based principles?

2. Promotion of persons with disabilities inclusion needs to be coupled with discussions of OPD partnerships. A structural and sustainable approach to discrimination requires expertise both on the root causes of the discrimination and how the exclusion "works" in practice for the rights-holders that are marginalised. **A truly inclusive approach should be based on "nothing without us", which in this case requires an OPD lead as well, not only the inclusion of rights-holders with disabilities.** Technical support can, of course, be provided by an OPD, but a direct partnership with an OPD as implementing partner would probably render better results.

3. The **cross-cutting objectives of gender equality and inclusion of persons with disabilities have helped to strengthen the principles of participation and non-discrimination in the design of interventions**. As the case study shows, women and girls are particularly targeted, and all projects have some degree of inclusion of persons with disabilities. It is, however, not always clear if the CCOs are also understood as reflections of the principles of non-discrimination and active and meaningful participation. Also, other forms of discrimination are generally overlooked. **Broadening non-discrimination from the current "target approach" to a more intersectional approach** (understanding different power relations and their impact on different rights-holders' human rights) **would be both more effective and sustainable from a societal perspective**.

4. Rights of LGBTQI persons are deeply controversial in the Tanzanian context and also challenging in Mozambique despite enabling legislation. **There are ways of being inclusive of LGBTQI persons also, where same-sex relations are criminalised, the LGBTQI rights-holders exist regardless of the laws. There is expertise available** both in Finland and among partners in different long-term development contexts that could support the MFA and its partners in how to promote the rights of LGBTI persons also in difficult contexts.

5. The case study on HRBA in headwinds showed that implementing **partners working on contested human rights often have a good understanding of the risks that come with a HRBA**. They analyse these risks and develop relevant mitigation strategies based on in-depth and regularly updated context and actor analyses. **Share lessons learned from their risk management approaches with other MFA partners.**

4.1   Implications for the main report

The experience of UNFPA of having an extended inception phase to further develop the project design as well as rethink the approach to disability rights was very positive. The project proposal had been developed in a call with a very short time frame, and the fact that the embassy granted a long inception phase allowed an in-depth discussion on the approach to persons with disabilities between the MFA/embassy and UNFPA on the one hand and UNFPA to engage with its the partner on the development of project objectives and approach.

The effectiveness and the added value of the application of HRBA concerns both improved human rights and the Rule of Law, as well as how rights-based principles are practised by implementing partners. HRBA is about achieving a better human rights situation as an end goal, but also contributing to a better understanding among rights-holders and duty-bearers on how the practice of HRBA lays the ground for the respect and fulfilment of human rights. These two dimensions of results from HRBA should be considered when discussing effectiveness.

4.2   Implications for case study actors

The longer inception phase in the UNFPA multi-bi project is a good example of dialogue between the MFA/embassy and partner that could serve as an example for other partnerships. A more structural follow-up of all partnerships is needed to monitor that the implementing partners deliver on the level of HRBA outlined in their proposals. This should also include human rights expert organisations.

CSO partners to the MFA should, to a higher degree, make use of the country expertise that is available in the circle of experienced Finnish CSOs and their partners.

Partners to the MFA would benefit from guidance on how to work with non-discrimination not only from "leave no one behind" but also "nothing about us without us". The work with marginalised groups, including persons with disabilities, is best informed by organised rights-holders from those groups. A more direct partnership with OPDs would therefore be welcomed. It is not sufficient to train organisations on discrimination of a specific group of rights-holder, internal practices and procedures also needs to be addressed, and in the best-case scenario, staff representing the group in focus would enhance the understanding of how to put active inclusion measures into practice.

CASE STUDY:
HRBA IN TRANSITION CONTEXTS

1   Introduction

1.1   Purpose of the case study

The purpose of this case study has been to analyse HRBA implementation in Finland's development cooperation in partner country contexts, **where Finland is transitioning from long-term partnerships in development cooperation modalities towards more trade-focused cooperation**. It aims at providing insight into the effectiveness of HRBA implementation and related strengths and challenges in these contexts where strong emphasis is given on the priority area of sustainable economic growth and decent work and, thereby, private sector development and an increasing share of development funding is channelled through private sector instruments (PSIs).

The analysis has been guided by the following questions:

- To what extent and how has HRBA contributed to the effectiveness of development cooperation in transition contexts? What have been the main achievements resulting from the implementation of HRBA?

- How have human rights-based processes contributed to the achievement of human rights-related results in transition contexts? What kind of contextual and other factors has supported or hindered HRBA implementation in transition contexts?

- To what extent has the HRBA perspective been included in the intervention risk management?

Since the case study largely focused on private sector development and related funding instruments, specific attention was paid to processes and measures for managing potential human rights risks in line with the MFA Guidance Note on HRBA (MFA, 2015) and the UN Guiding Principles on Business and Human Rights (UNGPs).

1.2   Overview of context

The case study covered three different transition country contexts, namely Zambia, Vietnam, and Kenya. Zambia was selected as a case study country due to its ongoing transition from long-term development cooperation to more trade-focused cooperation. The growth of the Zambian economy is seen to be on a level that allows the ending of the bilateral partnership between Finland and Zambia in the near future and focuses on other forms of collaboration, especially in commerce. Zambia is expected to reach its goal of becoming a middle-income country by 2030, e.g., due to the increasing demand for critical minerals. Also, Finnish companies, e.g., from the renewable energy, agriculture and forestry and mining and environmental technology sectors, are showing increasing interest in Zambia, and the annual value of trade between Finland and Zambia has ranged between 20-40 million euros. Still, almost half of Zambia's population is multidimensionally poor and sharp economic inequalities are likely to slow down social development and societal change in Zambia. (UNDP, 2023).

The analysis of Zambia is complemented by an analysis of Finland's transition-related development cooperation in Vietnam, where the transition process has advanced further. In Vietnam, all bilateral cooperation was phased out in 2020, and the cooperation currently largely focuses on supporting the private sector. The Vietnamese economy has grown fast in recent decades, and the country has opened rapidly to international trade, and in 2022 Finland's exports to Vietnam were valued at about 400 million euro. The circular economy, climate solutions, and sustainable forestry are seen as potential sectors for increasing commercial cooperation between Finland and Vietnam. (van Gerwen et al., 2021). At the same time, problems related to, e.g., freedom of association, child labour, gender-based discrimination, occupational health and safety, and work time are widely recognised human rights challenges in the context of Vietnam (ILO & IFC, 2021).

In addition, the context of Kenya was analysed since, even though this lower middle-income country is still Finland's partner country for long-term development cooperation, an increasing emphasis is given to private sector development and trade-focused cooperation. Kenya is seen as an increasingly attractive destination for Finnish companies and investment facilities, and Finland's country strategy for Kenya (2021-2024) highlights the role of private sector instruments in the creation of beneficial synergies with the development cooperation work done through the Country Programme, e.g., to support Kenya in transitioning in an economically and socially inclusive as well as sustainable manner, and in solidifying democracy and human rights (MFA, 2021b).

1.3   Methods and sample

In line with the purpose of this case study, the overall methodology focused on qualitative analysis of data collected through desk review, key informant interviews (68) and focus group discussions (3). The desk review materials included strategies, plans, progress reports, review and evaluation reports, and other key documents of sample interventions, relevant MFA policies and guidelines, and documents related to MFA's monitoring and decision-making, as well as other, e.g. context-related documents. Interviews were conducted with intervention stakeholders including representatives of implementing organisations, duty-bearers and rights-holders, and in some cases, focus group discussions were used for collecting data from rights-holders. Also, MFA staff in Embassies and Helsinki, as well as some external stakeholders, were interviewed to get a wider understanding of the transition context and how HRBA has been reflected in MFA's overall work in the transition process.

The case study sample included a total of 12 interventions implemented in Zambia (6), Vietnam (3) and Kenya (3) (**Table 3**). Most of the interventions represented private sector instruments, but the sample also included one bilateral project, two projects funded by the Institutional Cooperation Instrument (ICI) and one civil society project. Thematically all projects had clear linkages to the private sector or livelihood development.

None of the analysed interventions have been part of MFA Country Programmes. In Zambia and Vietnam, the MFA doesn't have country programmes due to their formal transition country status, and in Kenya, the analysed interventions have been funded by Finnpartnership and Finnfund outside the MFA Country Programme.

As a case study rather than a full evaluation, this report doesn't provide a definitive performance assessment of HRBA in Finland's development policy and development cooperation in transition contexts. Rather, it offers insights to inform the wider evaluation.

Table 3. Sample of the case study - transition

COOPERATION INSTRUMENT	INTERVENTION NAME	COUNTRY	IMPLEMENTED BY
Bilateral	Accelerated Growth for Micro, Small and Medium-Sized Enterprises in Zambia (AGS) Programme	Zambia	AGS Team (Niras), in partnership with Ministry for Small and Medium Enterprise Development (MSMED)
ICI	THL-NAPSA Partnership	Zambia	Finnish National Institute of Health and Welfare (THL) and Zambian National Pension Scheme Authority (NAPSA)
PSI: Finnfund	Expansion of aquaculture business of Yalelo Limited	Zambia	Yalelo Ltd
PSI: Finnpartnership	Sustainable fertilizers	Zambia	BioSorbio Oy
CSO	Community strategies for climate-resilient livelihood	Zambia	Green Living Movement Suomi ry with Green Living Movement Zambia and Young Women's Christian Association (YWCA) Zambia
PSI: Nordic Development Fund (NDF)	Development of Green Climate Fund (GCF) Proposal on Transforming Landscapes and Resilience for Development Project (TRALARD) (2019-2020)	Zambia	World Bank (WB) and the Ministry of National Development Planning
PSI: Finnfund	Kasha	Kenya	Kasha Global Inc
PSI: Finnpartnership	Amani Care	Kenya	Amanihoiva Kotihoito Oy
PSI: Finnpartnership	Identifying Fair Trade partners and launching cooperation in Kenya and Tanzania	Kenya	Mifuko Oy
ICI	Capacity building on the development of value chain of wood products industries in Vietnam	Vietnam	Natural Resources Institute
PSI: Finnpartnership	Bevetrade	Vietnam	Bevetrade Oy
PSI: Finnpartnership	Preparation and planning of European Union (EU)-Vietnam REACH Information Centre	Vietnam	Chementors Oy

Source: Evaluation team

2 Findings

2.1 Implications of transition to the roles of MFA and Embassies

Finding 1: The transition process implies changes in the roles of MFA staff in Helsinki and Embassies in managing Finland's development cooperation in partner countries. An increasing share of Finland's development cooperation in transition contexts is managed by instrument-specific structures in Helsinki.

In transition contexts like Zambia and Vietnam, Finland's development cooperation is no longer guided by country programmes. Bilateral development cooperation is gradually phased out while the emphasis on private sector instruments increases. This shift has direct implications for the share of roles and responsibilities within MFA in Helsinki and Embassies in development cooperation and promotion and monitoring of HRBA implementation in interventions in these contexts. It also increases the role of **instrument-specific management structures** such as the Finnfund office and Finnpartnership programme team in Finland.

In Vietnam and Zambia, the role of MFA country desk officers in Helsinki and Embassy staff responsible for development cooperation has gradually narrowed down to fewer instruments and interventions. Regarding Vietnam, where the bilateral cooperation ended in 2020, their role currently focuses primarily on the management and monitoring of ICI projects, the Local Funds for Cooperation, and some regional initiatives. Regarding Zambia, the MFA country desk officer and the Embassy staff still have a role in the management of the last bilateral intervention. They also provide comments on the funding proposals of CSO and Finnpartnership interventions managed from Helsinki. However, they don't play a direct role in the management or monitoring of these instruments or, e.g., Finnfund projects, this being the responsibility of structures based in Helsinki and a few Finnpartnership and Finnfund staff in developing countries.

As noted above, Kenya is still Finland's longer-term cooperation country, where bilateral cooperation is guided by a country programme. However, the increase in private sector instruments implies that an increasing share of Finnish development cooperation in Kenya is implemented outside the country programme and managed by other MFA departments or other instrument-specific structures in Helsinki.

Embassies play a leading role in Team Finland's commerce-, trade- and investment-focused activities and provide some facilitation support also to Finnish companies receiving funding from the private sector instruments. However, the interviews indicate that this cooperation has remained on a rather practical level in all three countries, and it has been related, e.g., to facilitating Finnish companies' participation in business events or other visits.

The interviews also indicate that while Finland has raised issues related to HRBA and human rights more widely in its bilateral political and diplomatic dialogue and participated in related discussions in the EU countries' cooperation and other donor fora in the case study countries, the

issues of business and human rights have been much less reflected in these discussions or other trade cooperation related fora. However, after a similar finding in *the Evaluation on the Transition Process of Finnish-Vietnamese Cooperation* (van Gerwen et al., 2021), Team Finland in Vietnam has taken a more proactive role, e.g., in selecting also environmental, social, and corporate governance (ESG) issues as annual priority themes, organizing related events, and publishing human rights related analyses and other information on the Team Finland webpage.

2.2   Findings regarding effectiveness

Finding 2: The level of HRBA implementation and achievement of related results varies greatly in the three transition contexts and even within the same funding instruments.

The general requirement of HRBA to be taken into consideration in Finland's development cooperation has been included in cooperation agreements and is widely recognised by organisations implementing the analysed development interventions, even though there are differences in the more specific HRBA-related guidance as well as planning and reporting related requirements for partners and interventions in different funding instruments. However, the analyses on the HRBA implementation in the three transition contexts indicate that the level of HRBA implementation varies greatly within the sample in each country context and within the same funding instruments.

The sample includes **several interventions in all three countries where attention to human rights and HRBA has remained minimal**, if not inexistent. However, also good practices and positive human rights results could be identified from some interventions under each instrument.

The evaluation team analysed the sample interventions by coding data from the available progress, review and evaluation reports, and other relevant documents, as well as KIIs, notes against evaluation indicators on key elements of HRBA. The analysis indicates that while most of the interventions in the sample remain on the human rights sensitive level according to the definitions of the MFA Guidance Note on HRBA (MFA, 2015), also elements of progressive and transformative levels were found (**Table 4**).

If the human rights perspective has overall been taken into consideration in the interventions implemented by private sector companies under different private sector instruments, the focus has largely been on ensuring the respect of human rights in a company's business operations. This emphasis on the human rights sensitive level is in line with the MFA Guidance Note on HRBA, as well as the UNGPs. A similar emphasis on corporate human rights responsibility is also reflected in Finland's bilateral Accelerated Growth for Small and Medium Size Companies (SME) programme in Zambia.

Table 4. Assessment of the level of HRBA implementation of the sample interventions by funding instrument category

FUNDING INSTRUMENT CATEGORY	SENSITIVE	PROGRESSIVE	TRANSFORMATIVE
PSIs (8 interventions)	Strengthened human rights due diligence (4) Some attention to human rights risks and/or principles (2) Very weak or no attention on *do no harm* or human rights principles (2)	Explicit aim to contribute to realisation of human rights (2)	
ICI (2 interventions)	HR principles applied, some attention to *do no harm* (1) Some attention to human rights principles, no attention to *do no harm* (1)	Strengthened capacities of duty-bearers, adherence to human rights principles (1)	Addressing root causes of discrimination (1)
Bilateral (1 intervention)	Attention to *do no harm*, HR principles applied (1)	Strengthening capacities of SMEs as responsible actors (1)	
CSO (1 intervention)	HR principles applied, some attention to *do no harm* (1)	Strengthening capacities of rights-holders, adherence to human rights principles (1)	Addressing root causes of discrimination (1, one component)

Source: Evaluation team

Finding 3: In the private sector-focused interventions (Finnfund, Finnpartnership, bilateral), the human rights results and considerations are related to the capacities of companies as other responsible actors to ensure respect of human rights in business activities.

As reflected in the MFA Guidance Note on HRBA (MFA, 2015), an essential aim of the HRBA is to strengthen the capacities of **rights-holders** to claim and take action for the realisation of their rights and the capacities of states and authorities at different levels as **duty-bearers** to fulfil their responsibilities to respect, protect and fulfil human rights. Furthermore, **other responsible actors** such as civil society actors, donors, international organisations, service providers, private sector actors, and traditional or religious leaders can also play an important role in human rights-based development processes. Their minimum responsibility is to respect human rights, but in development interventions, they often also play a role in promoting, protecting, and fulfilling human rights.

In business-focused interventions where the HRBA concentrates on corporate human rights responsibility, the aim has been to strengthen the human rights-related capacities of companies as **other responsible actors**. This is clearly reflected in two Finnpartnership projects, the Finnfund investments and the bilateral Accelerated Growth for SMEs (AGS) programme in Zambia. However, the extent to which and how the companies' human rights-related capacities have actually strengthened varies greatly.

Finnfund's partner Kasha is an e-commerce platform selling health, hygiene, and self-care products to women in poorer and rural communities through a web platform, phone and via an agent network in East Africa, including Kenya. Kasha has taken important steps, e.g., in developing its

human rights-related policies and guidelines. It is also continuously developing its tools and processes for regular staff engagement, feedback and training of the agent network in Kenya. The information gathered through feedback channels and engagement with these stakeholders is used for further developing the policies, processes, and practices of the company.

The Finnpartnership project of Bevetrade Ltd imports high-quality beverages to Finland. Through its project in Vietnam, the company aimed to conduct a human rights risk assessment with a focus on women's and children's rights and strengthening the local business partner's capacities in human rights due diligence. The project was interrupted due to insurmountable challenges in the value chain in Vietnam, e.g., related to workers' rights. However, learning from the project has guided the further development of the company's business to ensure respect for human rights in the value chains. For example, a screening on potential human rights risks is done already when considering expanding the business to a new country, and the human rights perspective is taken into consideration in the discussions and interaction with potential new partners and their staff.

In Zambia, the bilateral AGS programme has included a training component for participating Zambian companies on how companies should develop and implement policies in relation to workers' rights as defined in ILO Conventions and the national law. The training has received positive feedback from participants, and progress in adopting human rights-related policies could be observed in one of the three companies visited by the evaluation team. However, as brought up by some interviewees and also reflected in the MTR report (FCG, 2021), there has been very limited monitoring of whether the learning from these training has been applied in practice more widely in the participating companies' actual business activities. It was also noted that overall longer-term practical guidance to companies supported with regular monitoring would be needed to achieve lasting results taking into consideration the very general challenges faced by small companies, e.g., in relation to occupational health and safety, working hours, living wage, or ensuring non-discrimination and equality in the Zambian context like in many other developing country contexts.

Finding 4: Strengthening the capacities of government duty-bearers on human rights was weakly addressed in the analysed interventions, except for one ICI project.

The role of the private sector implemented interventions under different funding instruments in strengthening the **capacities of government duty-bearers** to fulfil their human rights-related duties has been almost inexistent. Many interventions had a very weak human rights focus overall, and in companies with stronger human rights emphasis, the importance of keeping the primary focus on business activities was underlined in several company-level interviews. Also, the bilateral AGS programme in Zambia has had a strong focus on supporting companies' business activities, while the government partners have played a lesser role in the intervention overall, and they haven't, as such, been involved in its human rights responsibility-related capacity development activities.

The strongest focus on the capacity development of government duty-bearers was found in the THL-NAPSA Partnership project in Zambia under the ICI instrument. The purpose of the project was to strengthen the capacity of the NAPSA as a government duty-bearer in fulfilling its duties towards the informal sector and rural workers as rights-holders. As reflected in the project documents, this was done by developing, testing and refining a currently operational social security scheme for selected informal sector professions. The intervention was implemented in cooperation with ILO, and the developed scheme and its processes were part of the African Union's (AU) Spirework Initiative guided by the ILO Conventions on decent work and social protection. Yet, the other analysed ICI-funded project implemented in Vietnam didn't include aspects of capacity

development of duty-bearers despite the relevance of human rights risk considerations in the forestry sector and wood processing supply chains, e.g., related to the furniture industry in Vietnam.

Finding 5: Private sector interventions paying explicit attention to human rights had activities strengthening the capacities of company employees, sales agents, or suppliers as rights-holders. Due to a lack of monitoring data, it is not possible to analyse the level of awareness of human rights norms and principles among rights-holders in private sector interventions.

In the private sector interventions funded by Finnpartnership or invested in by Finnfund, and where human rights were explicitly taken into consideration, at least to some extent, the human rights-related focus has largely been on companies' internal processes and activities strengthening the capacities of company employees or in some cases sales agents or suppliers as rights-holders. In most cases, the Finnish funding or other support has not as such been related to human rights or corporate human rights responsibility but to the development of business activities, and the role of the funding instruments in strengthening the partner company's human rights responsibility-related policies or practices has remained limited.

Examples of the funded companies' efforts to strengthen their employee or other stakeholders' capacities as rights-holders:

- The two Finnfund-investee companies in Zambia and Kenya have developed channels for employee engagement and conducted training or discussions with staff on their rights and responsibilities.

- The Finnpartnership-funded company Mifuko Ltd, the subsidiary Punonta's staff in Kenya, receive training on their rights and the rights of artisans in community-based self-help groups supplying Fair Trade baskets to the company. The human rights-related principles guiding Mifuko's business activities are also discussed with the artisans.

- The Finnpartnership funded company Amani Kotihoiva Oy has supported the curriculum development and launching of training for Health Care Assistants at Masai Mara University in Kenya, and the training course for the first group of students has included some lessons on human rights.

Due to the lack of or not having access to the company level monitoring data, it is not possible to analyse the level of awareness on human rights norms and principles among the rights-holders potentially affected by business activities. The interviews indicate that in companies with explicit human rights-related policies in place, employees are familiar with these policies and processes for their implementations. In some other companies with a less explicit approach to human rights the staff were aware of the channels for raising their work-related concerns and discussed issues directly related to workers' rights, e.g., in relation to occupational health and safety and gender equality but didn't seem to be aware of the human rights linkages.

Finding 6: The analysed interventions funded by other instruments had a lesser focus on strengthening the rights-holders' capacities. The capacities of rights-holders were most clearly addressed in the CSO project.

In the interventions funded by other instruments, the level of attention to strengthening the capacities of rights-holders to claim their rights has varied. The CSO project of Green Living Movement

Finland and Zambia, and the YWCA Zambia was the only intervention in the case study sample with a clear focus on the capacity development of **rights-holders** to claim and act for their rights with emphasis on women, girls, and youth in vulnerable rural communities in Zambia. Explicit efforts to strengthen the capacities of rights-holders in claiming their rights are primarily related to the prevention of gender-based violence (GBV) and support to GBV victims in accessing services and claiming their rights. According to the project documents, during the first year of project implementation, the project had increased knowledge on GBV and available services for over 9000 people in the project areas, including schools and traditional leadership through community dialogues, training of volunteers and setting up Drop-in Centres for victims of GBV. Interviews of project stakeholders, including rights-holders in target communities, clearly indicate also more widely strengthened participation of especially women in community-level processes and decision-making. There seems to be also strengthened awareness on issues of non-discrimination with emphasis on girls, women and persons with disabilities.

The other project elements of this CSO project are related to livelihoods, water and sanitation and climate change mitigation and aim at strengthening the capacities of community stakeholders to take an active role in related development processes in their communities and people's daily lives, as well as in having related interaction with relevant government duty-bearers, such as District Departments of Livestock and Fisheries or Forestry. However, the human rights perspective is only implicitly reflected in these project components.

Regarding the ICI interventions, the WoodVN project in Vietnam doesn't include any specific human rights considerations overall or related to rights-holders' capacities. Neither did the THL-NAPSA project focus on the empowerment of rights-holders as such, but the rights-holders awareness of their right to social security and collecting their feedback and information on their needs was an essential element of the project, as underlined by several interviewed project stakeholders. For this reason, continuous consultation and awareness-raising tested during the project implementation were built into the system itself. The project didn't measure changes in the awareness of rights-holders on their rights as such but focused on monitoring the number of new members in the social security scheme. This indicator doesn't as such measure the level of awareness of the right to social security among the informal sector and rural workers but reflects more generally the rights-holders willingness and capacity to participate and contribute to the scheme.

Finding 7: The interventions of different funding instruments in the three country contexts have played a rather limited role in addressing root causes of discrimination in legislation, customs, norms, and practices and in engaging in related policy dialogue. Only one ICI project and the CSO project included this kind of element.

The above findings on the role of analysed interventions of different funding instruments in strengthening the capacities of duty-bearers and rights-holders are naturally reflected also in how and to what extent these interventions have contributed to the **creation of processes leading to accountability and transparency** of duty-bearers and other responsible actors towards rights-holders, and addressing **root causes of discrimination** in legislation, customs, norms, and practices. Overall, the analysed interventions in all three case study countries had a rather limited role in engaging in strategic policy dialogue or contributing through other channels to the creation of processes and capacities that address root causes of discrimination.

In private company-implemented interventions funded by Finnpartnership or invested in by Finnfund, the emphasis in HRBA implementation, if any, has primarily been on the company's internal accountability processes through employee engagement or communication and interaction with

other key stakeholders in the value chain, such as direct suppliers or sales agents. None of the analysed interventions has aimed as such at creating processes and capacities that address root causes of discrimination in legislation, customs, norms and practices beyond the policies, processes, and practices of companies themselves. The funded companies have not been engaged in corporate human rights responsibility or more widely human rights-related strategic policy dialogue with government duty-bearers or other relevant stakeholders. Neither was it possible to identify the intentional use of leverage for promoting respect for human rights among other business actors or government duty-bearers in their operating environment in any of the three countries.

Also, the role of the bilateral AGS programme in the creation of processes leading to accountability and transparency has been limited to the training activities where participating SMEs have been encouraged to ensure employee engagement and channels for raising concerns and grievances. The programme doesn't specifically aim at addressing root causes of discrimination beyond the above-noted training. Strategic policy-level dialogue with the government has been minimal, except for some small-scale influencing related to an ongoing Micro, Small and Medium Enterprises (MSME) policy development of the Ministry for MSMED.

Out of the two analysed ICI interventions, the THL-NAPSA project developing a new social security scheme for informal and rural economy workers can, as such be seen to have addressed root causes of discrimination, social security being a human right that has remained largely unrealised in the informal sector in Zambia like in many other developing countries as underlined by several interviewees. Furthermore, according to the project documents, the intervention also included dialogue with the Ministry of Labour and Social Security on related legislation and making the approach also known among other relevant government institutions. In the development of the scheme, attention was paid to gender equality and inclusion of women, and to some extent to inclusion of persons with disabilities. However, since the scheme is based on member contributions, it is evident that the poorest and those in the most vulnerable situations are not targeted.

> *"All the informal sector workers are definitely beyond the frontier, but they are not the most vulnerable and poorest ones, who are not able to contribute and would rather need cash transfer kind of support. It's better that people are within a social protection system; this is a global aim, and social assistance is meant just for a small part of the population."*
> (KII, partner)

The community-based CSO project in Zambia can be seen to address root causes of discrimination in customs and practices in the target communities by strengthening community awareness of GBV and related human rights, its prevention, and services for victims, as well as the development of related community level monitoring, services, and referral. The project has facilitated interaction between rights-holders, traditional and other community leaders, and district-level government duty-bearers with the aim of strengthening transparency and empowering rights-holders in communities to claim their rights. However, the focus has been strongly on local-level processes, and the project has not included strategic policy dialogue, e.g., due to resource constraints. This is in line with the findings of the other case studies of this evaluation - HRBA in conflict settings, long-term development cooperation contexts and headwinds on legal and different forms of SRH(R) services enabling the implementing organisations to reach out to both rights-holders and duty-bearers on human rights education and awareness on discriminatory attitudes and behaviours.

Finding 8: Actual or early signs of improvements in the realisation of human rights could be found only in two interventions (CSO and ICI) in relation to protection from GBV as well as decent work and the right to social security. Such improvements could not be observed in the private sector-related interventions due to their primary focus on business development as well as weak monitoring and lack of transparent reporting of human rights-related results.

The scope of this case study didn't allow evaluation of such improvements in the realisation of human rights as a result of the analysed interventions. However, based on the desk review and conducted interviews following kinds of human rights results could be identified:

In the CSO project in Zambia there's an indication on improvements in the realisation of the rights of GBV victims in the target communities. According to project documents, during the first year of project implementation, the number of GBV victims linked to GBV services in the target communities had reached from 0 to 179. Furthermore, while not explicitly addressed as human rights issues in the project, there are also indications that the project contributes to improvements, e.g., in the realisation of the right to water and sanitation in terms of improved access to safe drinking water and the right to food in terms of number of meals per day in the households in target communities.

In the THL-NAPSA project in Zambia, an increase in the number of informal sector workers contributing to the new social security scheme is an early indication of expected improvements in the realisation of right to social security. According to the project completion report, the number of new members of the scheme by the end of 2020 was 33,491. However, this increase in the membership does not yet mean improvements in the realisation of the right to social security, a key issue being the longer-term commitment of the members required to access benefits.

Interviews with private sector project implementers indicate that besides a lack of attention to HRBA issues in the planning, implementation and reporting of some interventions (2 projects), there are also other factors hindering the identification of positive human rights results in the private sector interventions funded by Finnpartnership and invested in by Finnfund:

- The assessed companies don't share their internal monitoring data related, e.g., to staff wellbeing and workers' rights. (All interventions)

- To make the business lucrative, it isn't possible to target the poorest of the poor. (1 Finnpartnership project)

- Even though there are indications of improvements in the realisation of the rights of marginalised people in the value chain, monitoring these changes is not within the core business of the company. (1 Finnfund and 1 Finnpartnership project)

- Failure in implementing the project hindered achievement of intended development impacts, e.g., related to workers' rights or right to food and adequate standard of living. (2 Finnpartnership projects)

Furthermore, a lack of human rights-related expected results and indicators naturally lead to a lack of human rights results monitoring regardless of funding instrument. For example, the aim and target of the bilateral AGS programme in Zambia to create new jobs has not been linked to compliance with the principles of decent work (FCG, 2021).

2.3 Findings regarding human rights-based processes as added value of HRBA

Besides results related to strengthened capacities of key stakeholders and institutions to ensure respect, protection, and fulfilment of human rights, as well as actual improvements in the realization of human rights, the HRBA gives an equal emphasis to the processes how these results are achieved. A human rights-based process is guided by human rights norms and the human rights principles of participation and inclusion, non-discrimination and equality, accountability, and transparency (HRBA portal, 2022; Kirkemann Boesen & Martin, 2007; MFA, 2015). Weak attention to these norms and principles is directly reflected in weak achievement of actual HRBA results.

Finding 9: The use of human rights norms guiding objective setting and monitoring remains very limited.

As reflected in the human rights ambition levels of the analysed interventions (**Table 4**) and **Table 5**, human rights norms have been weakly applied in most of the interventions to guide the planning, implementation, monitoring and evaluation.

In the case of private sector interventions, the sample included three interventions (2 Finnpartnership, 1 Finnfund), where the company has explicitly used human rights norms, especially related to workers and women's rights, as a framework guiding the development of their human rights-related policies and due diligence processes. In other interventions, explicit use of human rights norms could not be found, even though in the case of two Finnpartnership projects, the report of the social and environmental impact-related voucher consultancy provided by Finnpartnership had included some general level guidance on the need to pay attention, e.g., to workers' rights.

In the case of the interventions of the other funding instruments, the human rights norms have clearly guided the GBV-related component of the CSO project and the efforts of the ICI-funded THL-NAPSA project in developing the social security scheme for the informal sector and rural workers in Zambia. These linkages to human rights norms have not explicitly been stated in the documents and reports of these interventions, but they were concretely shown in the interviews of project partners as well as in some IEC materials and other background documents. For example, in the THL-NAPSA project, the AU Spirework framework approach and the ILO conventions and standards on decent work and the right to social security have clearly guided the development of the social security scheme for the informal sector and rural workers. Related norms are addressed in the project on a concrete level, while they are not explicitly referred to in the available reports.

The bilateral AGS programme was planned as a human rights-sensitive intervention with no specific objectives related to human rights. Human rights norms are reflected in the content of the specific training activity for MSMEs. However, the interviews indicate that these norms are not so systematically looked into in the selection of participating MSMEs, and as noted above, related monitoring on the level of companies remains very limited.

Table 5. Human rights principles and norms at least partially reflected in the analysed interventions and practices of partners per funding instrument category.

HRBA PRINCIPLES AND NORMS	FUNDING INSTRUMENT CATEGORY			
	PSIS (8 interventions)	ICI (2 interventions)	BILATERAL (1 intervention)	CSO (1 intervention)
Participation and inclusion	5 interventions	2 interventions	1 intervention	1 intervention
Non-discrimination and equality	6 interventions	1 intervention	1 intervention	1 intervention
Accountability	4 interventions	1 intervention		1 intervention
Transparency	3 interventions	1 intervention	1 intervention	1 intervention
Human rights norms	3 interventions (*do no harm*)	1 intervention	1 intervention (*do no harm*)	1 intervention (1 component)
None	2 interventions			

Source: Evaluation team

Finding 10: At least some attention has been paid to the principle of non-discrimination and equality with an emphasis on gender equality in most interventions, but no information on more systematic power analyses could be found. In several private sector interventions (Finnpartnership, Finnfund), the human rights principles are reflected to a varying extent in the companies' internal processes but much less in relation to external stakeholders, and the outward transparency remains rather limited.

The human rights principles of participation and inclusion, non-discrimination and equality, accountability, and transparency were at least to some extent reflected in the planning, implementation, and monitoring of most of the analysed interventions (see Table 4 above).

In private sector instrument funded interventions, where the principles of *participation, non-discrimination* and *equality* were reflected, this was mostly in relation to employee engagement, development of and training of staff on non-discrimination and equality-related policies. Regarding the principle of non-discrimination and equality, the aim is mostly to prevent and address workplace discrimination in general and ensure gender equality without more specific attention to any marginalised groups. While some of the companies interacted with local communities, participation and inclusion of external rights-holders in discussions on and processes for addressing the companies' human rights' actual or potential impacts remained very limited overall. Only one company has systematic interaction on its human rights-related principles with its suppliers and another one with its sales agents.

The Finnfund-invested interventions in Kenya and Zambia included elements of more systematic implementation of the principles of participation, inclusion, non-discrimination and equality, contributing to increased accountability. Besides systematic development of company policies and practices, and regular staff engagement and capacity building, Kasha is systematically strengthening

gender equality in its operations based on a comprehensive gender analysis that covers different areas of the business operations and geographical target areas in Kenya.

Yalelo Limited, invested in by Finnfund, is the largest fully integrated aquaculture company in Sub-Saharan Africa. The company produces tilapia in Siavonga, on Lake Kariba in Zambia. In 2021 Finnfund conducted with Yalelo, an employee video survey with a survey technology developed by a Finnish tech company, allowing anonymous responses without literacy requirements. The survey included several questions related to the quality of work, how things are at the workplace, including gender equality and other forms of discrimination, as well as questions related to staff wellbeing at home. The survey received positive feedback both from employees and the company management, and the findings were addressed, e.g., through improved information sharing. However, its use will not be continued by the company due to the involved costs.

The principles of **participation and inclusion and non-discrimination and equality** were reflected at least to some extent in the interventions of the other funding instruments, the strongest emphasis being given to gender equality. However, none of the assessed interventions had conducted systematic power analysis on the situation and vulnerabilities of marginalised groups to get a more in-depth understanding on inequalities and discrimination as well as their root causes. Furthermore, while intervention stakeholders were aware of the rights of persons with disabilities and the emphasis given by MFA on disability inclusion as a cross-cutting objective, challenges related to lack of expertise and good practices, as well as the need for more concrete guidance in relation to meaningful inclusion of persons living with disabilities in interventions were brought up by several interviewees from implementing organisations.

The principles of participation, Inclusion, non-discrimination and equality were most clearly reflected in the CSO intervention in Zambia, where the creation of community-led participatory processes with a focus on gender equality and strengthened attention to the inclusion of persons with disabilities was at the core of the intervention logic in relation to GBV prevention and response, and also the other project components, e.g., on sustainable livelihoods.

As a follow-up to the project Mid-Term Review recommendations (Tertium Oy, 2019), the ICI-funded THL-NAPSA intervention in Zambia strengthened its strategies for the inclusion of female-dominated professions in the social security scheme, e.g., through the identification of new target groups and the addition of maternity leave related benefits. Furthermore, research on gender and disability mainstreaming strategy in the social protection for informal and rural economy workers in Zambia was conducted, drawing attention, e.g., to equity in terms of access to information on the benefit packages and community development decision-making by all. However, the project documents and conducted interviews indicate that despite some positive developments in strengthening the share of women in the social security scheme, by the end of the intervention, the membership was still strongly male-dominated, reflecting the gender balance in the intervention target groups, including bus and taxi drivers, saw millers, marketers and traders, self-employed, and domestic workers. Progress in the inclusion of persons with disabilities seems to have remained minimal.

Finding 11: The principles of accountability and transparency are less explicitly reflected in the analysed interventions, regardless of the funding instrument.

The principle of **accountability** is overall much less explicitly reflected in the analysed interventions compared to the principles of participation, non-discrimination and equality. In the Finnpartnership and Finnfund interventions, it was primarily reflected in the channels for employees (or, in some cases 2nd tier workers) to raise their concerns and the management mechanisms for addressing

these issues. This shows a strong focus on companies' internal accountability relations. Mechanisms for strengthening the company accountability towards external rights-holders, e.g., in surrounding communities, were mostly lacking, and as reflected above, the companies haven't played a role in promoting accountability of other responsible actors or government duty-bearers.

Also, in the interventions of other funding instruments, the principle of accountability is more weakly and less explicitly reflected, while there were also good examples. Besides processes for project stakeholders to raise their project-related concerns or complaints, the CSO project in Zambia promotes accountability of government duty-bearers by linking the rights-holders in communities to government services, e.g., by facilitating service providers' community visits and by supporting the GBV victims in claiming their rights through legal advice provided in community-based drop-in centres. An integral element of the ICI-funded THL-NAPSA project in Zambia was to develop mechanisms for collecting feedback from the potential and actual members of the social security scheme. However, in the conducted interviews, some concerns were raised on the limited possibilities of individual members to make grievances due to accessibility constraints and prevailing social norms.

In addition to accountability, the principle of transparency is not so explicitly reflected in the analysed interventions regardless of the funding instrument, which makes it difficult to assess. In the Finnpartnership and Finnfund interventions, the principle of transparency was, to a varying extent, reflected in the internal information sharing and communication processes of some implementing partners. However, while the principle of transparency, requiring the companies to communicate about their human rights risks and impacts as well as related human rights due diligence processes, is clearly reflected in the UNGPs, the outwards transparency in the analysed interventions remains limited, e.g., due to business secrets. Interestingly, in the interview with the management of one of the forerunner companies, concerns were raised about the company possibly being considered a CSO, rather than a business, by external stakeholders if it communicated more openly about its human rights commitments and related due diligence processes.

In the interventions of other funding instruments, the principle of transparency wasn't explicitly addressed, e.g., in project plans and reports, while interviewed project stakeholders considered that this principle is reflected in the open communication between the implementing organisations and project beneficiaries or in the case of the bilateral AGS programme in Zambia, also, in openly sharing information about the decisions on the support to individual MSMEs.

Finding 12: Support to interventions on HRBA implementation has been limited, but there are examples where MFA or the organisation managing the funding instrument has played a more proactive role in promoting HRBA in the private sector implemented interventions.

While there are country-specific human rights challenges in each transition context affecting human rights-based development cooperation in general (e.g., related to civil and political rights) or, more specifically, private sector cooperation (e.g., related to living wage vs minimum salary), fear for these challenges doesn't seem to have been the reason for weak HRBA implementation in the analysed interventions. Challenges brought up in interviews as issues affecting HRBA implementation were related to the perception of low level of human rights risks in the intervention or early phase in the business planning process (Finnpartnership), weak understanding and skills to implement HRBA overall or on human rights issues in the intervention context (Finnpartnership and ICI); as well as lack of information on good practices developed in other interventions or instruments and lack of sharing information on failures (bilateral, Finnpartnership).

MFA's support of HRBA implementation to the analysed interventions has been primarily based on written guidance, such as the MFA Guidance Note on HRBA (MFA, 2015), the bilateral cooperation manual (MFA, 2018a) and the more recent ICI manual (MFA, 2021d) and other funding instrument specific application and reporting requirements. However, closer guidance to or monitoring of individual interventions has remained rather limited overall. This reflects the very scarce human and time resources within MFA in Helsinki and Embassies, this being an issue repeatedly brought up especially by the MFA interviewees but also by some project partners.

Regarding the private sector implemented interventions, Finnpartnership and Finnfund pay attention to human rights issues and especially potential negative human rights impacts during the preparatory phase and screening of processes. Finnfund has discussed with companies seeking investments and loans their possible gaps in policies and practices, as well as measures for gradually strengthening the management of their salient human rights risks and monitored the follow-up during the project implementation and especially in connection to the planning of the possible following project phase (Finnfund, 2023). Finnpartnership has offered small-scale human rights consultancy voucher services for companies with higher human rights-related risks in their projects, and the human rights perspective has been, to some extent, even though on a very general level, reflected in the provided consultancy support on social and environmental impacts.

The case study analysis indicates that during the implementation phase, the development of human rights policies and processes and practices for their implementation has been primarily initiated and implemented by the concerned companies themselves, mostly without support from the donor. However, there are some exceptions where the donor has played a more proactive role in relation to HRBA.

As noted above, a confidential employee survey conducted by Finnfund with Yalelo staff in Zambia in 2021 was a tool to support accountability and transparency within the company. The survey received positive feedback both from employees and the company management, and the findings were addressed, e.g., through improved information sharing. However, its use will not be continued by the company due to the costs involved. Regarding Finnpartnership, human rights voucher consultancy support to Bevetrade Ltd helped the company in planning the human rights due diligence process in its supply chain in Vietnam and also in identifying and reacting to the realised risks in the supply chain.

The donor guidance and support to HRBA implementation in other instruments has also been limited. The bilateral AGS programme has received some advisory support from MFA Helsinki on the integration of HRBA into the project document during the planning phase and monitoring by Embassy staff during the implementation. The ICI implementers have received some training on HRBA during the past few years, which has not yet affected the analysed projects, the implementation of which had started already earlier. In addition, training organised by the umbrella organisation of Finnish development CSOs (Fingo ry.) on disability inclusion was brought up by one interviewee. However, overall, the HRBA implementation has largely relied on the existing capacities of partner organisations and their staff and their efforts to concretise and operationalise the approach, while related support or learning from other actors has remained limited.

2.4   Findings regarding risk management

Ensuring *do no harm* is a minimum requirement for all MFA-supported interventions defined in the MFA Guidance Note on HRBA (MFA, 2015), but the extent to which this aspect has been reflected in the understanding of risks and risk management of the analysed interventions implemented varies greatly regardless of the country context.

Finding 13: In line with the HRBA Guidance Note, in private sector interventions (Finnpartnership, Finnfund, bilateral) the HRBA has largely focused on human rights risk management. There are some forerunner companies that have systematically integrated the human rights perspective into their risk management, but also several companies that have not identified, assessed and monitored their human rights risks in the project context.

The MFA Guidance Note and the UNGPs bring the companies' responsibility to respect human rights and thereby their human rights risk management to the core of private sector interventions. While this is reflected to some extent in most of the analysed interventions (Finnpartnership, Finnfund, bilateral), remarkable gaps were found in several interventions.

Regarding the Finnpartnership interventions, even though the commitment to respect human rights is included in the project agreements and underlined also by company representatives in interviews, more systematic identification, and analysis of human rights risks in the project context was missing in several projects. However, there was also one clear forerunner. Mifuko Oy, a Finnish SME producing baskets in Kenya and Tanzania is a member of the World Fair Trade Organization (WFTO). It monitors and reports on the WFTO principles including related human rights risks in its business operations. Strong emphasis is given to monitoring and interaction with staff and self-help group members in communities through social media and regular meetings, as well as channels for artisans and staff to raise their concerns and ideas. As result of close community monitoring the company was some years ago able to address problems identified in the distribution of income within basket weaving self-help groups. Good awareness of community-level situations and challenges has allowed the company staff to identify and address also other issues for further development of processes and practices with self-help groups.

There were also two cases where were the failure of the Finnpartnership project had linkages to potential risks related to workers' rights in their value chains. Both cases highlight the importance of proper context-specific human rights risk analysis during the planning phase and continuous monitoring, that in turn requires besides general understanding of human rights and also familiarity with the local context. Unfamiliarity with the local context in Finnish companies expanding their business to new developing countries as an issue affecting human rights risk management of Finnish companies was brought up in several interviews. The representatives of the companies whose projects had failed underlined the importance of openly sharing information also about project failures for helping future projects avoid similar situations or be able to address them in a timely manner.

Commitment to respect human rights is also included in Finnfund agreements with companies. According to interviewed Finnfund staff, in many cases, Finnfund plays a proactive role in identifying and analysing the salient human rights risks and discussing these risks with the company to ensure that the human rights risks are addressed in the company's policies and processes while the company itself doesn't necessarily conduct human rights risk assessment or explicitly monitor human rights risks. However, there are also partner companies that proactively develop their own

human rights policies and human rights risk management. Both types of cases were represented in the case study sample.

The other company has systematically made progress in integrating human rights perspectives into its understanding of risks and risk management starting with its own operations and sales agents. It has also identified the need for the next steps in this process related to human rights risk assessment in supply chains. In the other intervention, Finnfund has played a more proactive role in supporting the company in integrating key elements of corporate human rights responsibility into its policies and processes, even though the company itself doesn't use the concept of human rights as such in its operations but refers primarily to the requirements of national law that are in most aspects in line, e.g. with the ILO core labour standards.

The risks of negative human rights impact of business activities and, thereby, corporate human rights risk management is also at the core of the risk management of the bilateral AGS programme due to its role in accelerating the growth of SMEs in Zambia. The HRBA has been integrated into the overall understanding of risks and risk management of the intervention. However, a lack of proper human rights risk analysis, a very generic risk indicator and weak monitoring affect the quality of intervention-level human rights risk management (FCG, 2021). The need for a standardised tool, e.g., for screening MSME applications, better resourcing of company-level monitoring as well as improved sharing of good practices between different funding instruments were identified by some interviewees as issues to be addressed in similar interventions in the future.

Finding 14: Integrating human rights risk perspective into the risk management of interventions of other funding instruments has been unsystematic.

The integration of the HRBA perspective into risk management has been unsystematic and overall weak in other than private sector-focused interventions. The emphasis in the risk analyses and monitoring of all interventions was strong, with small exceptions, on the risks potentially affecting project implementation and achievement of the objectives.

For example, the perspective of *do no harm* was vaguely reflected in the plans and documents of the CSO intervention in Zambia that included only one clearly human right-related risk on questioning of women's role in the intervention by other community members and other constraints potentially hindering their participation. However, the interviews clearly showed that the human rights risk perspective is better taken into consideration in the GBV component of the project with policies on potential human rights risks in place, ensuring the commitment of key staff and stakeholders to these policies, as well as channels for raising grievances.

Finding 15: Many projects have some complaint or grievance channels in place, but accessible grievance mechanisms for external stakeholders are often lacking.

Several projects of different funding instruments had some kind of channels for staff or community members to raise their human rights-related concerns and grievances. In the case of private sector implemented interventions, the forerunner companies have defined processes in their policies for employees to raise their concerns or report misconduct and communicated these policies and practices to employees who seem to be aware of the available channels. Similar channels for making complaints could be found, for example, in the CSO intervention in Zambia, where community members can raise their project-related complaints to the community-level authorities.

However, the desk review and interviews indicate that in all funding instruments, there's a clear need to develop and further strengthen grievance channels and mechanisms, especially for external stakeholders. It also seems that so far, less attention has been paid to analysing and ensuring accessibility of these channels to all rights-holders or to the possibility for them to make anonymous grievances. Furthermore, very limited information could be found on defined processes for addressing and remediating reported human rights-related cases as necessary.

Finding 16: Only a few concerns were raised on the negative effects of the use of HRBA on the achievement of objectives. This may reflect a lower emphasis on human rights issues in many of the analysed interventions, as well as their largely non-controversial focus.

Risks to the achievement of the objectives related to the use of HRBA were identified only by a few interviewees. In the bilateral AGS programme in Zambia, concerns related to the aim of strengthening gender equality by involving women-led companies in the programme were brought up as a risk for achieving the target set for trade promotion, many of the women-led companies being small-scale businesses operating locally. Another interviewee brought up the risks of not openly discussing the risks and risks levels, e.g., related to mismanagement of resources or fraud in specific local contexts due to fear of being discriminative. This was considered a risk, especially for companies less familiar with their project contexts, and as an issue to be addressed in the future support to project implementors.

These kinds of risks are something to be taken into consideration in planning of future interventions and advisory support to project implementers. However, the issue of so few concerns being raised may reflect, on the one hand, the lower profile given to human rights issues in many of the analysed interventions, on the other hand, the largely non-controversial focus of these interventions. For example, explicit promotion of the rights of LGBTIQ+ people as a topic where specific attention to risk management would be needed in the Zambian context, like in many other African countries, was brought up by one interviewee.

3   Conclusions

The level of HRBA implementation and achievement of HRBA results varies greatly within the analysed transition contexts and even within the same funding instruments. While there are interventions where practically no attention has been paid to human rights norms and principles (PSIs and ICI), there are also interventions with encouraging results (PSIs, ICI, CSO). The clearest HRBA results related to improvements in the realisation of human rights could naturally be observed in interventions with evidently human rights-related aims, e.g., regarding the prevention of and response to GBV or the realisation of the right to social security. (See findings 2, 8, 9,10)

The strengthening of focus on business and trade development in transition contexts brings a new angle to the HRBA implementation and interpretation of related results. In this kind of intervention funded through private sector instruments, and also other MFA funding instruments, **the HRBA focuses primarily on the responsibility of companies to ensure respect for human rights in their business activities** by systematically managing their human rights risks and addressing their potential negative human rights impacts. (See findings 3, 5, 13)

Even though a company-level policy commitment to human rights and having functioning **human rights due diligence processes** in place are a minimum-requirements for an intervention to be considered as human rights sensitive, the analysis shows that in many cases, the companies implementing interventions are still on a very early stage in developing these processes. (See findings 2, 8, 9, 10, 11) However, as reflected in the UNGPs, the development of human rights due diligence is a continuous long-term process in all country contexts, and especially in transition contexts where abuse of, for example, workers' rights in the private sector is more general, e.g., due to weaker enforcement of labour laws and other contextual factors. **If integrated into the logic, objective setting and monitoring of intervention, progress made in developing these processes can be considered as clear HRBA results**. The analysis shows that this is an area for further development in the planning and especially monitoring and reporting of MFA-funded interventions. (See finding 12)

The analysis indicates that the increasing emphasis in HRBA implementation on private sector actors' responsibility to respect human rights **reduces the role of Finnish development cooperation in strengthening the capacities of government stakeholders as primary duty-bearers in ensuring the respect, protection, and fulfilment of human rights**. MFA or the supported interventions in the transition contexts have played a rather limited role in promoting corporate human rights responsibility and implementation of UNGPs beyond the level of individual companies. Still, the example of the THL-NAPSA project in Zambia on the development of a social security scheme for the informal sector and rural workers shows the potential of ICI interventions in promoting human rights that are highly relevant in the transition to trade-focused cooperation. If MFA aims at having human rights progressive and transformative development cooperation also in transition contexts, more attention needs to be paid to linking the MFA-funded interventions to processes strengthening awareness, commitment, and capacities of primary duty-bearers in the area of business and human rights. (See findings 4, 7, 1)

Ensuring *do no harm* is a minimum requirement for all MFA-supported interventions (MFA, 2015), but the **extent to which this aspect has been reflected in the understanding of risks and risk**

management of the analysed interventions varies greatly. It is natural that in the private sector, implemented or focused interventions, a greater, even though the varying level of emphasis has been given on human rights risk management, as reflected above. In interventions of other instruments, the HRBA perspective has been weakly reflected in risk management, this being an issue requiring further attention in the future. (See findings 13, 14) While many interventions have some complaint or grievance channels in place for project participants, employees or other key stakeholders, there are clear gaps in ensuring accessible grievance mechanisms for external stakeholders, as well as enabling anonymous reporting. (See finding 15)

The transition from longer-term development cooperation towards trade-focused cooperation implies changes in the share of roles and responsibilities within MFA in Helsinki and Embassies in managing and monitoring development interventions and relevant policy dialogue. Even though Vietnam is the first transition country, efforts have been made to strengthen the HRBA, e.g. in the work of Team Finland, and the HRBA perspectives are being integrated into the transition planning, it seems that more **systematic analysis of the implications of the transition process and increasing emphasis on private sector instruments in and strategic planning of MFA's role in promoting and supporting HRBA implementation is still largely missing** in the contexts of Zambia and Kenya. (See finding 1, 13)

The analysis indicates that the interventions where HRBA has been more successfully implemented have been largely implemented by companies or organisations that had a firm commitment to human rights, as well as HRBA-related expertise and experience already before receiving MFA funding for their interventions. Even though there are real human rights challenges also in the analysed transition contexts, weak implementation of HRBA is not related to implementing partners' fear of those challenges but rather to **weak knowledge and understanding of human rights, HRBA and HRBA implementation, as well as the relevance of HRBA to interventions**. Addressing these capacity gaps through concrete and pragmatic capacity development or at least taking them more systematically into consideration in the selection of funded partners would be essential for ensuring that all MFA-funded development interventions are at least truly human rights sensitive. (See findings 12, 13,16)

4   Lessons learnt

Strengthening of corporate human rights responsibility in line with the human rights sensitive level requirements of the MFA Guidance Note on HRBA and the UNGPs is a long-term process that implies continuous context-specific analysis, monitoring, learning, and adjustment of processes and practices. However, the capacities of many companies to put this into practice in their development interventions remains limited due to weak familiarity with HRBA and, in some cases, also with the local contexts where the interventions are implemented. For this reason, there's a clear need for strengthened practical guidance and support to companies on identifying, assessing, and managing concrete **human rights risks** in their project contexts, for example, through Helpdesk services. Furthermore, sharing both good practices on human rights risk management and also **learning from failures** would help especially newcomer companies in operationalising their corporate **human rights due diligence** in new local contexts.

Transition to increasingly business-focused development cooperation implies a growing emphasis in HRBA implementation on the **capacities of companies to respect human rights in their business activities**. If MFA aims at funding human rights progressive and transformative development cooperation also in transition contexts, attention should be paid to linking **Finnish development cooperation to policy-level dialogue and processes related to business and human rights**, for example, business and trade development related policies and strategies, National Action Plans on Business and Human Rights, or human rights monitoring mechanisms such as the UPR. Besides supporting this kind of process and related capacity development of government duty-bearers, e.g., through bilateral or multilateral cooperation in future transition contexts, this could also be also by increasingly linking interventions implemented by private sector companies to policy level processes and fora for sharing of good practices and learning. For example, MFA and Embassy staff could play an important role in sharing this kind of information by themselves and facilitating companies in doing it through Team Finland's networks, in the above-noted processes, and business summits or other relevant events.

Furthermore, the example of the THL-NAPSA project on social security system development in Zambia shows the potential of ICI projects in contributing to improved realisation of human rights specifically relevant to transition processes and contexts. Using this potential of human rights-based ICI interventions would enable MFA to strategically strengthen the HRBA ambition level in its future transition processes in different country contexts.

The analysis showed clear gaps in human rights risk management in interventions of different funding instruments. There's an obvious need for improved context and intervention-specific human rights risk analysis, which seems to be, in many cases, largely lacking. Even though many interventions already have some complaint mechanisms in place, there's a clear need to strengthen grievance mechanisms in all instruments as an essential element of *do no harm*. Specific attention should be paid to the development of accessible grievance mechanisms and also to external stakeholders, including marginalised groups potentially affected by the interventions. Furthermore, it is important to develop processes and practices for addressing grievances and providing remedies as necessary.

CASE STUDY:
HRBA IN CONFLICT CONTEXT

1   Overview of context

1.1   Introduction: Purpose, methods and scope of the case study

The purpose of this case study is to analyse how HRBA is being applied through a range of instruments in conflict-affected countries. This has been important as these contexts constitute a large and growing proportion of Finnish development cooperation interventions. Furthermore, countries in conflict represent unique challenges for applying HRBA in several respects. Ambitions may be severely constrained in environments where duty-bearers frequently lack legitimacy or fail to accept their responsibilities. Other actors, including humanitarian agencies and the UN, may be forced to engage beyond their intended roles. Peacebuilding efforts encompass mediating roles between rights-holders and duty-bearers that may or may not reflect HRBA norms if there are diverging aims between efforts to reduce conflict tensions and demand duty-bearer accountability. The results and added values pursued across the diverse humanitarian-development-peace nexuses may involve a conscious or tacit intermingling of needs- and rights-based approaches. Interventions, including those funded through development windows, may reflect the prevalence of humanitarian resources earmarked for meeting needs. As a result, the HRBA emphasis on rights may therefore be 'crowded out'. Some cooperation instruments may involve actors applying HRBA in ways that are outside of conventional modalities as they are adapted to highly uncertain and volatile conditions. Overall, emerging advice related to how to act within the humanitarian-development-peace triple nexus intends to provide a basis for overcoming the divisions between these approaches (Development Policy Committee, 2021), but such guidance is strikingly silent about if and how HRBA fits into this equation. Even where HRBA is specifically mentioned as important in relation to the triple nexus (MFA, 2022b), the guidance does not touch on the conundrums in making these links uncovered in this case study.

All of this suggests high levels of risk and the need for agility and foresight in anticipating where interventions may 'do harm' to respect for human rights in highly polarised and violent environments. It also demands awareness of where the HRBA-oriented development cooperation may 'do harm' to delicate engagements with duty-bearers and warring parties where neutrality is an essential aspect of the working environment. The interventions analysed in this case study were selected to reflect how to work with duty-bearers – primarily via multilateral, ICI and CSO instruments – and rights-holders – primarily via Funds for Local Cooperation (FLC) and CSO instruments – respond to these challenges. The analyses review how human rights are being defended within protracted protection crises, chronic conflict, post-conflict societal healing and (in some cases) 'de-development' where efforts are directed at slowing deterioration amid chronic conflict.

The overall approach of the case study has been to analyse these dynamics and assumptions to understand the theories of change behind efforts to apply HRBA in conflict countries. The case study sample included in total nine interventions implemented in Somalia (3), Palestine (2), Kenya (2), Syria (1) and Ukraine (1). Most of the interventions were channelled through CSO and FLC instruments with two multilateral projects and one project funded by the ICI. The case studies represented highly diverse conflict settings and were selected as examples of the different approaches applied. The experience was also drawn from other conflict-related case studies in the evaluation.

The case study's overall methods were based on desk review and KIIs. In addition to KIIs and focus group discussions with intervention stakeholders, also MFA staff in the embassy in Nairobi and in Helsinki as well as some external stakeholders were interviewed to get a wider understanding of how HRBA has been reflected in MFA Finland's overall work in conflict-affected countries.

Interventions reviewed include CSO, multi-bi, FLC, ICI and multilateral instruments (**Table 6**). The sample is weighted towards civil society instruments due in part to their prevalence in the development cooperation in the selected countries. This also reflects these interventions being clear examples of the issues being analysed. Some are peacebuilding-focused, others quasi-humanitarian service provision, though classified as developmental. Most strive to emphasise disability, which is an area that is new to many partners and seen as an important entry point to initiate HRBA efforts. It is clearly a Finnish niche, even in conflict.

Table 6. Sample of the case study - conflict

COOPERATION INSTRUMENT	INTERVENTION NAME	COUNTRY	IMPLEMENTED BY
CSO	West Bank Protection Consortium	Palestine	Norwegian Refugee Council (NRC)
CSO	Contributing towards peace and justice through promoted resilience and livelihoods of women and young people in West Bank	Palestine	Finnish YMCA
CSO	Support to implementation of National Reconciliation Framework	Somalia	Finn Church Aid (FCA)
CSO	Daryeel Mobile Health Clinic Project in Afmadow town in Jubaland, Somalia	Somalia	Suomi-Somalia Seura ry
CSO	Hiil Hooyo	Somalia	FSN
Multilateral (multi-bi)	Finnish cooperation with UN Women in Kenya	Kenya	UN Women
FLC	Wezesha Amani Mashinani na Mama (WAMAMA) (Grassroots Women Enabling Peace)	Kenya	Rural Women Peace Link (RWPL)
ICI	UHMC-FMI Meteorology Project	Ukraine	Finnish Meteorological Institute (FMI)
Multilateral (multi-bi)	Delivering on a child's right to education: Strengthening access and quality of learning in Syria (also in the disability case study)	Syria	UNICEF

Source: Evaluation Team

As a case study rather than a full evaluation, this report does not provide a definitive performance assessment of HRBA in Finland's development policy and development cooperation in conflict situations. Rather, it offers insights to inform the wider evaluation.

2　Findings

2.1　General issues of direct salience to the case study focus

Finding 1: The diversity of contexts and the complexity of divergent goals have meant that there is uncertainty and frustration within the MFA and among partners regarding how to apply HRBA within triple nexus interventions.

The scope for and nature of HRBA in conflict contexts is determined by the facts on the ground. Understanding the scope for (and risks in) the application of HRBA and the nature of subsequent results in conflict settings is at the heart of unresolved nexus conundrums:

- Needs versus rights as a basis for design and mandate for intervention

- Readiness to confront human rights abuse versus reducing tensions and avoiding conflict

- Neutrality versus confronting the power and political factors that lead to failures to respect human rights

The resulting conundrums are reflected in prevailing frustrations, apparent in interviews within the MFA and among partners. This frustration, in turn, reflects how the opportunities and obstacles to applying HRBA in conflict are very different in each context. Central to this diversity are the opportunities and obstacles regarding engagement with duty-bearers, ranging from the strict sanction-related restrictions in Syria to proactive engagement in Somalia to the uncertainties emerging in the devolution process in Kenya to the failure of the state to accept responsibilities in Lebanon and the occupying power being the main violator of rights in Palestine. Each constitutes a unique set of challenges in determining how to engage with duty-bearers.

Peacebuilding and HRBA come together in commitments to strengthen the voice and capacities of rights-holders while also generating ambiguities about how to relate to duty-bearers. Interviews indicate a recognition of the need to preserve channels of communication is paramount, even if responsible actors, such as community elders in Somalia or young warriors in Kenya, are themselves the main perpetrators of gender-related human rights abuses.

Interviews clearly indicate that the MFA has been supportive of partner learning through dialogue and adaptive management. Particularly at the embassy level, the conundrums noted above are being confronted. This has been described by some informants as essential for dealing with unique and dynamically changing contexts and 'wicked problems' related to the questioned legitimacy, capacities and commitments of duty-bearers. Standard advisory roles and HRBA guidance are seen as insufficient to respond to the intractable issues arising in conflict contexts.

Finding 2: HRBA highlights the structural nature of the problems that need to be addressed in conflict situations, as well as the inadequacy of relatively short-term and small-scale responses.

In the cases analysed, findings repeatedly point to the acknowledgement that HRBA linked to peace-building is about changing deep-seated attitudes and cultural norms. It is recognised that these are processes which are not aligned with short-term project timeframes. This misfit raises questions about the ultimate outcomes of development cooperation that lacks a theory of change for future sustainability. This is aggravated by the tendency for donor priorities to move on from peace-building when the memory of the conflict fades (as apparent in the Kenya country programme, wherein this focus was inspired by the violence after previous elections but where reduced violence has been reported to have led to this focus receiving decreasing emphasis). Capacity development for rights-holders and duty-bearers may appear to be relevant within the project timeframe but may yield limited long-term results if they are managed as one-off inputs. RWPL is an example of a project with a strong emphasis on (gender) inclusion and local-level participation and accountability. There is recognition of the importance of relevant processes and significant achievements, but there is also a recognition of how this process needs to be anchored in incremental capacity development, cultural change and adaptation to local dynamics. Short-term project inputs are recognised as only being relevant if they lead to changes within county-level systems. Action plans that reflect HRBA principles were developed, but it is very unclear if or how they will be sustained. For example, one report acknowledges that the one-off training provided for marginalised groups was insufficient for them to advocate and hold political leadership to account (RWPL, 2019).

This also brings out conundrums when communities maintain and reproduce norms that generate both conflict and human rights abuses, most notably gender-based violence in Kenya. The participation principle of HRBA is not a panacea when the community norms are the problem that needs to be addressed.

Disability is prominent as a human rights focus in the conflict interventions. Addressing disability amid conflict may seem like a self-evident priority, but interviews and reporting indicate that it also carries with it inherent challenges:

- It is new and surprising to many partners

- It reveals the conundrums of challenges in engaging with weak or illegitimate duty-bearers due to the obvious importance of structural solutions in order to transcend charity approaches

- Small efforts may be effective in piloting changes in relations between rights-holders and frontline duty-bearers, but engagements at higher levels are uncertain

- Disability may come into focus in conflict contexts due to the increase in visible amputees, but this may generate a narrow emphasis on veterans rather than commitments to broader and equitable inclusion

Finding 3: Opportunities to apply HRBA in conflict situations are highly diverse and need to be tailored to prevailing opportunities and constraints –there are no standard models for response.

The general conditions for HRBA engagements are often shifting, along with perceived account-abilities, as interventions can provide a forum for learning and innovation (amid devolution in Kenya) and agile adaptation to a shifting political environment (Palestine). HRBA may involve working with the UN as an intermediary to see what is possible when the 'rules' appear to be frozen and encompass wicked problems, such as those inherent in working within the constraints of the sanctions in Syria.

An example of where the 'rules' that are expected to frame HRBA application are not directly in sync and demand nimble planning and implementation is Palestine. Opportunities to engage with and confront an occupying power that is violating both International Humanitarian Law and International Human Rights Law have led to a tailored toolbox:

> *"'Integrated Protection Approach (IPA)' to counter prevalent violations of IHL which give rise to forcible transfer. The IPA incorporates responsive, remedial, and environment-building actions at the community level and advocacy with Third States, International Organizations and Palestinian Authorities to challenge policies and practices resulting in forcible transfer."* (Sandouka, M., Freij, N., 2018)

The separation of HRBA and humanitarianism in Palestine was described one interview as "nebulous". Blatant attacks on human rights and forced transfers have led to an increasing framing in human rights terms, even if the actual response measures can be characterised as being primarily humanitarian, I.e., in the use of material assistance and humanitarian protection modalities. In more of an HRBA mode, this is starting to be underpinned by rights-holder capacity development, e.g., the creation of Community-Based Preparedness Committees to ensure that rights-holders are aware of channels for legal, psychological and emergency response (Norwegian Refugee Council, 2021).

2.2   Findings regarding effectiveness

A striking finding in the sample of interventions in conflict contexts is that, in many respects, most pursue effectiveness in ways that are not significantly different from non-conflict settings, despite what can be assumed to be the prevalence of much more severe human rights violations. Finland's Meteorological Institute's support in Ukraine has run into implementation challenges due to the war, but its incremental progress towards understanding and applying HRBA related to, e.g., gender equality has not been notably different due to the war per se. Cooperation in health care and SRHR in Somalia also bears little indication of the conflict being a determining factor in how plans have been conceptualised. Differences due to the conflict context may be more apparent in the range of instruments (weighted towards civil society rather than multilateral and bilateral engagements with the state) rather than in the design of specific interventions. This has implications for the aspects of HRBA that are emphasised. It should be stressed though, that those CSO and multilateral partners that have undertaken and applied in depth *do no harm* and human rights analyses have designed approaches where HRBA assumes more ambitious and conflict aware approaches.

Finding 4: Finnish HRBA efforts in conflict situations have been effective at a micro level and, as such, indirectly addressing human rights abuses, but the structural factors and difficulties in influencing higher-level duty-bearers limit wider outcomes and sustainability.

Overall, most of the interventions in the sample have largely found innovative and effective ways to engage in HRBA-related processes, even though the ultimate outcomes remain uncertain. As a striking example of this, the West Bank Protection Consortium is a clear (but rare and unique) example of a project that explicitly reflects humanitarian principles while also explicitly responding to human rights violations and intentional 'de-development' efforts. This chosen nexus approach is in response to the occupying power actively seeking to undermine the livelihoods and living conditions of the conflict-affected population. This 'protection-centred approach to humanitarian response' shows that these different sets of norms are not necessarily incompatible, even if the model used is not directly replicable to other contexts. Overall, this project has proven highly effective, with numerous outputs and outcomes reported in relation to rights-holder capacities, duty-bearer accountability, non-discrimination and rights-holder participation, even if opportunities for strengthening aspects related to duty-bearer capacities have been more limited. Legal advice, policy analysis and dialogue with the Palestinian Authority are the main entry points, but absorptive capacities are limited. The External Evaluation of the West Bank Protection Consortium (WBPC) (Sandouka, M., Freij, N., 2018) notes that the WBPC lacks systems to strengthen local CSOs and otherwise contribute to localisation.

This example also illustrates how HRBA efforts may be very effective in providing assistance and reducing the negative impact of human rights abuses while not being able to turn the tide in the deterioration of conditions. Reporting refers to 'pathways to resilience', but in a broader perspective, the human rights situation continues to deteriorate. The Consortium can, in its numerous assistance and protection capacity development outputs, be seen as one of MFA's most effective examples of HRBA while still just alleviating (rather than solving) some of the problems of human rights abuses at the micro-level.

Within the interventions, the Consortium is assessed by the External Evaluation of the WBPC 2015-2017 (2018) to act in an accountable manner towards rights-holders, who are adequately provided with opportunities to influence plans. Efforts are also made to increase the accountability of the Palestinian Authority for services. Innovative efforts to influence the occupying authority, such as initiating legal 'public interest cases' to establish judicial precedents to expand protection, have been piloted. In general, though, the approaches reflect a humanitarian approach to encouraging accountabilities, as illustrated by ensuring that the Palestinian Authority provides staff for facilities that have been reconstructed, more than the capacity development focus that would be common in development interventions and expected in HRBA.

By contrast, YMCA focuses more on the positive aspects of peace-making in Palestine by providing training and other support so that youth learn about their rights, particularly economic and educational rights. The expectation is that they will become agents of positive change. The terminology used very much reflects HRBA guidance, but the content of how this is operationalised in a polarised conflict situation is not explained. The initial proposal included a brief description of the human rights situation, but the theory of change for responding to this human rights situation is unclear. It is not apparent what is expected to happen when the intervention attempts to defend those rights in the face of aggression and human rights abuses. The dilemmas and obstacles faced by the other interventions implemented in Palestine in this case study are not apparent. The focus is on three districts with high levels of violence (Nablus, Hebron and Bethlehem), but the drivers of these conflicts are not explained. The solutions presented, educational and vocational rehabilitation, life

skills and self-employment, are described, but not the human rights problems that they are intended to solve. Considerable attention is given to the inclusion of persons with disabilities, but there is no apparent engagement with OPDs (despite this being emphasised in initial plans), with the existing partners consulting directly with persons with disabilities instead. Engagement with duty-bearers is exclusively focused on local representatives of the Palestinian Authority.

Finding 5: There is moderate effectiveness in applying HRBA in relation to SRHR and gender-related initiatives, but cultural factors and weaknesses in translating service provision gains into systemic change among duty-bearers limit results.

Peacebuilding interventions in Kenya have generated an understanding of the gendered implications of devolved governance that respects the rights-holders' voice – reflected in the integration of peacebuilding elements in county development plans. Gender has been a particular focus, based on UN Security Council Resolution 1325, and stakeholders recognise that HRBA demands that they must confront deep-seated norms, with mixed results.

> *"Gatekeepers are elders, authorities, religious leaders, and politicians. In matters of inclusivity, some of the key aspects are the cultural norms. In Mount Eldon involved in a treaty to address the local conflict. Clan elders lead. Our role is to bring in women. Had to have several meetings to discuss this. May say they agree, but has always been a male space. Only one woman participated in that treaty out of 15."* (KII, partner)

In Somalia, such cultural norms have been recognised by partners as limiting women's and persons with disabilities' access to health services and participation in local governance. This exclusion is recognised as a human rights issue, but stakeholders from different CSO interventions acknowledge that influencing cultural norms that reproduce human rights abuses is extremely difficult, slow and sometimes impossible to address. It is also recognised that these are delicate processes, as pressing too hard for results may be counterproductive if it ultimately weakens the standing of key allies in local government or triggers push-back by, e.g., community elders.

Surprisingly strong interventions have been developed to respond to rights to SRHR and other health services in Somalia, despite the governance weaknesses and uncertain ownership. This has demonstrated how work with frontline service providers/duty-bearers can yield results, but there are limits to sustainable and systemic results due to limits to the higher-level engagement required for sustainable accountability. Services can demonstrate the importance of inclusion, but due to the local CSO focus and the lack of interfaces with the government in CSO interventions, there are only a few examples of these efforts exerting influence within government structures.

Finding 6: Efforts are effective in enhancing the accountability of local authorities, though some progress has also been made with higher-level duty-bearers and in engaging women in leadership and electoral processes.

The FCA project has clear indicators (though often very activity-focused, in accordance with MFA requests) for actions directed at the participation of women in electoral processes. This includes increasing the capacities of rights-holders to demand accountability and the installation of more women in positions as duty-bearers. The emphasis is on local initiatives and community participation but also includes actions to influence higher levels. Desired outcomes focus on rebuilding the social contract. MFA has pushed for more attention to higher-level accountabilities, which FCA has found challenging. Project advisors have been embedded at the ministerial level, but the results of these inputs in enhancing duty-bearer capacities are not yet confirmed. This exemplifies some

of the difficult choices that emerge in conflict-affected countries in selecting between a focus on the relations between local duty-bearers and responsible parties versus national actors. CSOs gravitate towards working with local dynamics, and their tools emphasise this. Working at the national level involves roles that would normally be led by multilateral partners and bilateral projects.

The Ukrainian Hydrometeorological Center (UHMC)-FMI Project focuses primarily on national-level duty-bearers. For this ICI project, the expansion of conflict came unexpectedly. The project had begun discussions on how to apply HRBA in relation to gender equality and reduction of inequality within the institution and in being more accountable to the recipients of its services. Consideration was also starting to be given to how climate change most severely affects marginalised communities and how this needed to be considered when designing information services. These were very new concepts for partners that were accustomed to dealing with technical issues. The most notable finding has been the continued commitment to learn and engage with these issues despite the conflict. It can be assumed (but not verified) that the abrupt upheaval may have contributed to a readiness to explore new approaches to collect feedback from rights-holders/users of meteorological information and become more accountable to them. New engagements with civil society may support this emerging awareness. Eagerness to align with the EU has also incentivised a general desire to integrate new norms. Furthermore, the war has led to new opportunities for women to assume more leadership roles in the organisation. However, there may also be emerging challenges to the readiness to respond to human rights principles. Even though there is more focus on inclusion, the provision of information in Russian for Russian-speaking users has become a sensitive issue.

2.3 Findings related to added value

Finding 7: Partners lack the tools and capacities to assess and describe the changes in attitudes and influence over sociocultural norms that reflect the added value of HRBA.

Assessing the added value (and indeed effectiveness more generally) of HRBA in conflict contexts is difficult due to the activity focus of much reporting. In Kenya, this is recognised by partners as being related to the difficulties in measuring HRBA-related attitudinal or behavioural changes related to aims such as greater accountability of local government or inclusion and participation of marginalised populations. Peace-building partners recognise the importance of these aims, but the overall review of documentation indicates that recording these changes is still difficult. As the embassy's country programme results report is largely based on partner reporting, this is reflected there as well. Even where there is evidence of 'results', such as the reduction in rates of gender-based violence in Kenya, it is not possible to verifiably attribute this to Finnish cooperation. It is plausible that Finland's leadership in these issues, underpinned by human rights commitments, has helped to bring together weaker actors (other donors), the UN system, the government and CSOs to achieve results. One interviewee described this as "tiny rivers coming together".

The added value should also be apparent in the extent to which interventions reflect conflict-aware human rights assessments. In MFA interviews, human rights assessments and conflict assessments are described together, given the interrelated nature of the issues raised in conflict-affected countries. The extent to which the embassies invest in their own assessments appears to vary in relation to the magnitude of the intervention and instrument. For example, with Asian embassies, the ability to undertake such assessments for small FLC projects is lacking, and therefore, these projects are few. By contrast, when the embassy in Myanmar received a UN Food and Agriculture

Organisation (FAO) proposal that had a weak conflict assessment, the embassy undertook an analysis themselves.

Among the CSO projects that primarily equate HRBA with the provision of services to increase access to healthcare, the added value of framing the interventions as HRBA provides is judged by the evaluation team to often be limited, despite exceptions noted below. It is not always apparent how healthcare interventions that are not designated as HRBA would be much different.

The Hiil Hooyo project of the FSN is an example of a project that clearly defines its human rights sensitive role as responding to the rights of women and particularly persons with disabilities to SRHR and health care in a context where the public health care system has been virtually destroyed by the conflict. However, in its letter responding to a request for an extension, MFA has judged that *"human rights as such is not the main goal".* Gender equality and reduced inequality are thus emphasised in what can be interpreted as being seen as a cross-cutting objective related to the service provision focus, based on the Agenda 2030 Leave No One Behind principle. Reporting provides limited evidence regarding whether HRBA adds value as, in the words of one informant, *"On HRBA, we were not required to report specifically on this, but rather on the activities. However, since all the activities were focused on the rights of mother and children, this can be said to have been covered."* In sum, this is an example of how operating in a quasi-humanitarian context, with a primary emphasis on needs, may be interpreted as encouraging a cross-cutting objective focus more than HRBA.

Finding 8: The added value of HRBA in conflict situations relates to shifting beyond a prevailing focus on humanitarian needs and therefore involves changing underlying attitudes and awareness of rights-holder perspectives.

Informants describe as prevailing service norms wherein, in principle, there has been a focus on equal rights for women, but in practice, the framing was largely needs-oriented. This may be a reflection of how the prevailing discourse in Somalia has been about needs given the quasi-humanitarian norms, which are, in turn, a reflection of the weakness/lack of resources of governmental institutions that limits duty-bearer accountability. Interviews indicate that stakeholders recognise that the entry point should have been more in the nascent government institutions rather than CSOs. MFA has expressed the view that in Somalia, in general, greater attention to linking with higher-level government authorities would have been advisable. In the view of the evaluation team, the likelihood of a small CSO project achieving significant engagement at the ministry level is limited unless perhaps they could present a clear and specific area of added value, such as guidance related to disability and SRHR.

Examples exist of working with service providers who are, due largely to a prevailing humanitarian focus, accustomed to responding to needs in an aggregate sense. Awareness raising regarding the specific rights of persons with disabilities has been an area where this is changing. Support from Disability Partnership Finland (DPF) and others enabled the FSN to develop a practical, rights-based curriculum for training healthcare staff that highlights the importance of reflecting on the obstacles faced by persons with disabilities in accessing healthcare in a manner that respects their dignity, particularly SRHR. The Daryeel Mobile Health Clinic, supported by the Finland Somalia Association, reports also benefiting from this experience, drawing on advice from Disability Partnership Finland. These efforts and others have led to attitudinal changes among frontline service providers as they have been encouraged and given tools to listen to the women they serve and to recognise how disability may hinder their capacities to express themselves. This has been particularly important when dealing with delicate topics such as SRHR. The FSN and its local

partners recognise that the strongest aspect of HRBA in this project has been this change in the relationship between frontline service providers and women with disabilities and the provision of a platform for these service providers to themselves reflect on prevailing discriminatory norms.

HRBA is thus about focusing on attitudinal factors to ensure the rights-holder's voice and overcome discrimination. It is apparent that raising the topic of disability has been an eye-opener for some. One interviewee described this as follows:

> *"When women come to the mother and child health centre, and they find someone to listen to them, that is giving them a voice. It also gives them a chance to talk about other issues, not even their pregnancy, that can help the health staff to deal with them on other issues. We had to train the midwives and nurses on being observant and to actively listen. When they see a woman is struggling to express herself or even to understand instructions, they should pause and consider maybe the woman has an issue, like hard of hearing or dumb or even cannot see properly. So don't shout at them, but take time with them to better understand."* (KII, partner)

Disability awareness raising among frontline service providers in Somalia and CSOs in rural Kenya has also stimulated clear engagement. Some interviewees contrasted the excitement and interest in addressing the rights of persons with disabilities with women's rights, for which they had already had a significant amount of training. The results reflect an effort to build on strong latent commitments to inclusion as healthcare staff are reported to value an opportunity to extend their services to groups of rights-holders that they had not reached before.

Embassy dialogue with UN Women in Kenya has led to the introduction of a stronger disability lens being applied to peacebuilding efforts. A review of documentation indicates that there was little attention given to disability when this multi-bi project began, but interviews demonstrate that disability rights are now becoming fully integrated into their work.

Apart from disability awareness, Hiil Hooyo exemplifies development cooperation that mainly reflects humanitarian (needs-based) norms, which appears to reflect the prevailing aid discourse in conflict contexts, despite funding being channelled through development windows. It can be questioned whether the application of general HRBA-inspired statements about the 'right to health care' in general adds value beyond the prevailing humanitarian needs-based discourse.

The Daryeel Mobile Health Clinic, supported by the Finland Somalia Association, has a similar orientation wherein equal/non-discriminatory access to health care (especially free medication) is stressed as the central emphasis of their application of HRBA. Some perceived 'HRBA' characteristics mentioned in documents and interviews related to this intervention include not discriminating among patients, providing services free of charge and targeting vulnerable communities, most notably persons with disabilities. One example of this was an interviewee who stated, *"The project was for sure based on a rights-based approach as it was directly dealing with issues of women's and children's right to healthcare."* (KII, partner)

MFA assessment of the UN Women's work in Kenya strongly emphasises the leave no one behind principle in relation to both gender and disability (even though disability aspects were given limited attention in the initial proposal). As such, inclusion is identified as a focus. It is notable, however, that factors of ethnic exclusion and related political polarisation and violence are not stressed, despite these being of obvious importance to the peacebuilding focus of Finland's country strategy. It is mentioned in one objective that "the participation of women and girls in conflict resolution and

peacebuilding in accordance with the 1325 resolution has been ensured." In general, UN Women is seen to have strong capacities for human rights assessment, particularly in relation to women and girls and their political participation.

Finding 9: Interventions have achieved some results in addressing power imbalances, but there are notable limits of small projects in reducing deep-seated patterns of discrimination.

In the United Nations agency for gender equality and women's rights (UN Women) work in Kenya and FCA in Somalia, HRBA can be seen to have been a framework for keeping a focus on outcomes related to non-discrimination in political processes as a way of managing conflict. Women's roles as peace mediators exemplify links between participation, non-discrimination and peacebuilding. Finland's profile in Kenya (and other countries) is thus very much associated with gendered aspects of peacebuilding, wherein Finland is perceived as the 'go to' donor. This creates opportunities to leverage bilateral cooperation for broader discussions about inclusion as a precondition for peace.

Across the interventions, there is a tendency among both multilateral and CSO interventions to frame discrimination as being rooted in discriminatory cultural and societal norms. It is notable, however, that the structural power imbalances within societies receive relatively less attention. Gendered (and youth) aspects of achieving power through political participation are noted, with emphasis on how these relate to changing attitudinal factors. However, unequal control of land and other natural resources receives scarce mention, as does the power that is derived from access to arms. HRBA has not provided tools to consistently bring in power analyses into planning and implementation. The notable exception to this is the West Bank Protection Consortium, wherein confronting the power of the occupying power is effectively integrated throughout their work.

Within UN Women cooperation, the focus on largely county-level participation has been a limitation in relation to promoting accountability at national levels that would perhaps be expected with a UN project. The theories of change for scaling up and scaling out activities initiated and outcomes achieved at the county level in Kenya are unclear. There is some reporting on training and information among higher-level duty-bearers, e.g., on COVID-related prevention of gender-based violence, but evidence of how these activities and output have led to outcomes is lacking. A Beijing Platform for Action implementation and monitoring platform were developed, and various initiatives were undertaken to improve data on gender-based violence, but the national outcomes of these initiatives are unclear compared to the county-level efforts. Data may increase transparency, but this will depend on how the data is ultimately used. These examples point to the importance of assessing the results of the strengthened capacity, production of HRBA-relevant legislation, plans, policies and procedures, etc. In relation to ultimate approvals, implementation and release of budgeted funds (the latter remaining problematic). Even in a relatively progressive and stable country such as Kenya, these factors stand in the way of HRBA results. This is mentioned in passing in interviews and reports but is often seen to reflect prevailing project timeframes and not given significant attention. Despite generally strong results at the activity level, an evaluation of RWPL and another related project found no evidence of progress in actually changing cultural norms (Collaborative Centre for Gender and Development, 2022).

With a very different approach focused on peacebuilding, the FCA project in Somalia emphasises strengthening accountability related to the legitimacy of (primarily) local duty-bearers. These aspects of the theory of change are described in the baseline report from 2022 as constituting increased public awareness of initiatives and improved perceptions of government engagement in reconciliation and the quality of related interventions.

Finding 10: HRBA has been effective in contributing to government transparency and legitimacy, but to achieve more profound results, individual interventions need to be part of a broader coherent political process.

It can be noted that the efforts of the FCA (and to some extent those of RWPL and UN Women at the country level in Kenya) are some of the few examples of interventions that encompass efforts to promote governmental transparency. Within FCA's work, the enhancement of the transparency of local authorities is part of the links between human rights and security, as it may also help reduce the power of al-Shabaab. In general, in Somalia, legitimacy is seen as linked to transparent and accountable governance. Indeed, one observer expressed concerns that al-Shabaab is often seen to be more legitimate than the recognised authorities due to greater transparency regarding its application of (its own) laws and procedures. This is a clear example of where HRBA can add strategic value in relation to security objectives if it can enhance the legitimacy of the government.

Another example of where HRBA in development cooperation can be seen as contributing to broader human rights objectives in foreign and security policies in the work of the West Bank Protection Consortium that acts to confront micro-level and protection needs related to human rights issues, which is expected to be complemented by EU and other international engagements at more macro levels to pressure the occupying power to respect its human rights responsibilities. It is beyond the scope of this evaluation to assess whether those intended synergies have been achieved, but the Consortium has actively advocated and raised awareness in European capitals and the UN to support these processes.

Finding 11: Informants question the value of current guidance and call for a shift to approaches that allow for greater adaptation to the diverse contextual realities of different conflicts.

Some MFA staff find guidelines to be useful even in conflict contexts, whereas others find them impractical to apply and prefer a dialogue and direct advice from advisors. This may relate to the management style of the individual, as well as to the diversity of conflict contexts. There is notable frustration, though, in applying advice more generally in conflict contexts.

The MFA has had difficulty advising on how to apply HRBA in conflict contexts. One interviewee stressed that *"the quality assurance board is very developmental"*, and therefore, their advice has not fit well with nexus challenges.

Within bilateral programming and embassy dialogue in general, interviewees report that the discussions relate more to how to put HRBA principles into practice within the local context. In Kenya, there is a view that there is broad agreement with the government about the values behind HRBA but uncertainty about what they imply, particularly in the fluid devolution process where learning is still underway about the roles of central and county-level duty-bearers.

There is little apparent differentiation between the application of HRBA and CCOs. They are seen as integrated, with one MFA informant in Kenya stating:

> *"We haven't needed to lower the bar. These HRBA issues are at any rate issues that need to be looked into during the planning phase, and the cross-cutting objective team does that. This is institutionalised."* (KII, MFA)

An MFA informant noted that the distinctions are *"Difficult to grasp, but perhaps not such a problem. Bigger problem is that people don't understand what we are talking about in general and its relevance to their work, not such a CCO vs HRBA issue."*

Though not exclusive to conflict countries, sensitivity to the term human rights limits its use, though there is a general view that this is not a major constraint as terms such as participation and inclusion can be used instead. This also relates to risk management, as semantics can generate or increase risks in dialogue on sensitive issues. In the words of one MFA informant, *"Applying the right language is not the important thing."*

2.4   Findings regarding risk management

Finding 12: There is an inherent tension between reducing conflict risks and demanding greater accountability and respect for human rights –the resulting coherence conundrums have not been confronted in MFA's current HRBA guidance.

The Development Policy Committee's triple nexus analysis (Development Policy Committee, 2021) has recommended that conflict sensitivity should be the 'principle guiding all interventions.' This could be interpreted as contradicting Finland's overall development policy that places human rights as the principle guiding all interventions. This highlights how caution about conflict risks may be at odds with other principles. The guidance states that "If conflict sensitivity is not prioritised, there is a risk of intensifying social tensions and exacerbating existing divisions." Such exacerbation may be unavoidable if human rights abuses and abusers are to be confronted. Ministry triple nexus guidance assumes that HRBA will reduce conflict risk:

> *"Applying the human rights-based approach can be seen first and foremost as having a preventive effect: if all actions are planned in adherence to human rights norms and implemented in accordance with human rights principles, it can be assumed that development will be more fair and sustainable and benefit all population groups (including women, girls and persons with disabilities), which, in turn, reduces conflicts and perceived injustice in society."* (MFA, 2022b)

This suggests contradictions if HRBA is expected to reduce risk, although conflict sensitivity should be applied to avoid exacerbating tensions that are presumably related to human rights violations. As a result of divergent recommendations such as this, interviews clearly indicate frustration and even irritation about the application of advice such as this in conflict contexts.

Finding 13: Conflict-relevant risk awareness is mixed among partners, with some exhibiting solid analyses and others largely oblivious to the implications of applying HRBA in the contexts in which they work.

The mix of actors being supported has very different types of risk management. Some are very much aware of the risks in engaging with duty-bearers that are compromised by the conflict. Others are not explicitly conscious of the existence of conflict-related risks when applying HRBA. In general, the evidence regarding the application of risk management is scant. For example, UN Women's plans rely on civil society, including community groups, to play a major role in monitoring eventual risks to human rights, though it is unclear if they have done so and with what results. Identified risks primarily refer to insufficient funding and commitments to carry out UN Women's work.

Otherwise, decisions about if and how to either contribute to duty-bearers' will and capacity to assume accountability, or to confront their human rights abuses, may frame how HRBA is integrated into risk management. Risks to human rights may be downplayed in order to foster a constructive relationship with duty-bearers (or other powerful actors) of dubious legitimacy. This can be seen as a way to maintain services, foster dialogue and explore opportunities to influence these actors in a more positive direction. This exemplifies the risk management strategies of most peacebuilding efforts. Alternatively, confronting human rights abuses or finding ways to actively circumvent discriminatory practices, such as in the case of the work of the West Bank Protection Consortium, can generate risks to retaining permission to operate, even though these strategies have an immediate impact on stopping specific cases of human rights abuse.

Conflict sensitivity is stressed as the foundation for triple nexus approaches (Development Policy Committee, 2021), and it has obvious implications for risk management. Surprisingly, other than some additional difficulty in engaging with duty-bearers, there is little indication in documentation and interviews related to some of the interventions that conflict sensitivity has been applied, nor that it has been seen as necessary. It would appear that, with some interventions, the conflict is considered a given factor in the operating environment that requires some due diligent security procedures but does not impinge on how HRBA is conceptualised or applied.

As a result, some interventions, such as the YMCA project, include risk assessment frameworks that are largely the same as international guidelines that are applied elsewhere, including child protection guidelines and policies for preventing sexual exploitation, abuse and harassment. Their extensive experience in working with children is seen as a relevant and sufficient basis for assessing and managing risks. No issues of risk related to HRBA have been noted. Their proposal included a brief overview of some risks related to the conflict, but these are not mentioned in subsequent reporting. In general, the intervention relies very heavily on the accumulated experience of the YMCA and its local partner to be attentive to and respond to any emerging risks. This wisdom in itself is described as responding to the minimum requirement of ensuring that the intervention does no harm.

Finding 14: Demands to ensure that interventions do no harm receive mixed attention, with some informants expressing concerns that doing no harm in the sense of avoiding conflict may block attention to human rights abuses.

The choices regarding if and how to apply conflict sensitivity are related to how the *do no harm* concept is understood. Despite the seemingly obvious greater risks of doing harm in a conflict context, most interviewees had not undertaken extra efforts in this regard. UN Women refers to training provisions in *do no harm* for duty-bearers and rights-holders but not what the capacities were ultimately used for. Others refer to this as part of a process to be cautious about "preaching" when raising issues about, e.g., gender-based violence, while still ensuring that ways are found to take up headwind issues. Among some, there is an acute awareness that this is a set of issues that cannot be addressed with simple guidelines but also cannot be ignored.

The issues around the shallow use of *do no harm* and conflict sensitivity described by one informant are related to the structure of aid.

> *"When it comes to local partners, such as the {…} or other local partners like them, for example, they are good at understanding and even communicating back the concepts such as rights-based approach, conflict sensitivity and do no harm. But when you dig a*

little bit deeper, you find that those are really hollow concepts to them. They don't take this into practice, or very often what I see is that they think it as a ticking the box exercise to please donors or the international NGOs. One of the challenges that keeps this challenge going is the very short funding cycles that these organisations receive. They hardly get the chance to internalise these concepts before funding ends and they have to look for other funding. So while donors demand that they have and understand these concepts, they do not actively support these organisations to do so." (KII)

Of particular note, some partners express concern that do no harm is used to justify failures to address human rights abuses, i.e., that the method could lead to caution about holding perpetrators to account to avoid stoking conflicts. While notable, this is not a widespread concern. It may, however, be interpreted as symptomatic of a tendency to stress peace more than rights. Partners may keep quiet about gender-based violence and child marriage so as not to upset delicate relations with elders and other powerful men. As a result, in the words of one informant, *"Programming for peace often neglects the HRBA perspective. For example, peace and SGBV projects often usually implemented as separate projects."*

Box 1. Interview quotes

Other comments relating to this dilemma include:

"A challenge with peace is that often agencies cut corners on human rights to buy peace." CSO officer

"We respect do no harm, but if we follow it we would not address FGM. Where rights are violated may need to do harm, i.e., to cultural rights. Have a lot of arguments about do no harm. Were criticised when had someone arrested for FGM as we did harm, but explained that it was community doing harm." (KII, partner)

"This is a big theme. We work with the elders and leaders. Not easy. Last visit we had a dialogue about culture where young boys were encouraged to rape. We presented our views in a calm manner and have seen that behavioural change can happen. We need our Kenyan partners who know the local culture, as the problems are not the same from place to place and it takes time to achieve changes so need this dialogue. Even more reason for us to be there." (KII, MFA)

"Often a dismissive attitude (from humanitarian agencies) on this. We don't have enough knowledge of what is an appropriate attitude. Humanitarians say we don't understand the priorities. GBV does not lead to death so not a priority. Don't realise it does not require additional resources. But we are still told to suspend these efforts for a while." (KII, partner)

Source: Evaluation team

Finding 15: There are some outstanding examples of risk analysis, but here again, the attention given to these aspects of risk varies considerably.

Another set of risks related to conflict analysis in a highly polarised environment is that research and policy analyses can be used by actors who are parties to the conflict to promote their own agendas that are not linked to human rights concerns. This has been noted by the West Bank Protection Consortium, which is acutely aware of the risks in how information can be used. It has a well-considered, conflict-relevant risk analysis framework and does not shy away from linking the need for legal and policy research to be used to inform and thereby protect agencies and interventions from those opposing its objectives. As a group of largely humanitarian organisations, the Consortium is well aware of and has methods to manage risks related to raising controversial human rights concerns more generally (including implications for the physical security of staff and rights-holders).

Despite the common lack of attention to the conflict, a few partners have adopted ambitious conflict analyses, including areas where the MFA has paid relatively little attention, such as ethnic discrimination. An MFA interviewee brought out how risks related to conflicts in the protection of the rights of indigenous peoples, particularly their rights to land, require a strong analysis. However, risks related to ethnic discrimination and involvement in natural resource conflicts were notably absent (though this may relate to the interventions in the sample).

Some innovative tools have been developed to strengthen ongoing conflict assessment and related risk management. The WBPC monitors vulnerability using an index that supports foresight in preparing for possible human rights violations, most notably forced evictions.

The embassies are reported to provide space for ongoing conflict risk assessments among partners, some of which involve protracted discussions. One interviewee noted that they are active in a dialogue with the advisors at MFA Helsinki to increase central-level awareness of field-level realities and opportunities/obstacles for applying HRBA. Another interviewee noted greater frustration with these interactions. One interviewee noted that, as MFA field staff are usually on fixed-term contracts, this may create disincentives for being frank about when headquarters advice is out of sync with field-level realities.

Finding 16: HRBA demands engagement with duty-bearers, but there are no easy answers about how, when and where to engage with duty-bearers of dubious legitimacy.

Sanctions may create systemic obstacles to HRBA. Restrictions on engagement with the Syrian government have meant that UNICEF is virtually powerless to apply HRBA due to its inability to rebuild state capacities and support demands for their accountability. A conundrum exists, given the risks of working towards accountability with an illegitimate state. UNICEF has noted the high costs of not investing in duty-bearer capacities (UNICEF Syria Country Office, 2022) and in one interview, it was mentioned that the investments in non-formal education might further undermine the credibility of the impoverished state school system. MFA interviews indicate a strong awareness of these risks of doing harm to the state's capacities and that this has led to a dialogue within the EU about the conundrums inherent in the ways that the sanctions impact the rights of children in particular.

By contrast, there may be risks that a focus on duty-bearers can disrupt local peacebuilding processes. Interviews indicate that pressures from MFA do not always align with the micro-level perspectives of CSOs. In Somalia, FCA has had concerns that MFA pressures to engage at

higher levels of government can encourage politicians to interfere with efforts to strengthen voice at community levels. They support these higher-level processes through secondments to public authorities but acknowledge uncertainty about their effectiveness. One CSO informant referred to their lack of "political agency" for influencing authorities. He felt that guidance for such influence was sufficient but not fully aligned with operational realities.

Nonetheless, among most informants, surprisingly few references were made to the risk of being expelled for drawing attention to human rights abuses (though this may be a greater risk when addressing headwinds issues). The WBPC highlights the strict and well-informed approach that has enabled them to adapt their work to prevailing constraints and avoid Israeli operating restrictions. This is notable in such an extremely volatile and politicised context. They acknowledge, however, that there are always risks that hostile groups will engage in polemic attacks on their work with uncertain outcomes.

3 Conclusions

An overall conclusion of this case study is that **consideration of HRBA in conflict contexts lays bare many of the intractable challenges that are (or at least should be) confronted when dealing with the triple nexus (see findings 1, 2, 16).** These considerations should force actors to ask uncomfortable questions that have rarely been answered in the discourse on how to 'make the nexus work'. These wicked questions get at the core of **complex trade-offs when dealing with duty-bearers of weak or disputed legitimacy; of how to work towards scaling up and scaling out HRBA models amid problematic institutional hierarchies; and how to make painful choices when deciding whether to devote limited resources to respond to immediate needs versus broader rights (see findings 12, 16).** The term 'seamless' is often evoked in discussions of the triple nexus. This case study suggests that the seamless merging of HRBA within the triple nexus may not always be a viable aim. If HRBA-relevant development and peace interventions are to be integrated with humanitarian assistance, then approaches from the human rights toolboxes are needed to confront and address these difficult questions. This is reflected in how human rights and conflict factors are effectively being assessed by the MFA as a set of issues that are highly interrelated. **This calls for HRBA guidance to be integrated with (but not overshadowed by) an understanding of conflict dynamics (see findings 3, 11, 13).** An obstacle to this is the emphasis on activities in current reporting, wherein the documentation of needs and quasi-humanitarian responses does not lend itself to making these links to the conflict-related human rights abuses that need to be addressed.

The MFA has found the **greatest added value from HRBA in keeping a focus on more inclusive (gender and disability) political processes and service provision at the local level (see findings 4, 5).** This has included models for a stronger role for women in mediation and attitudinal change toward disability in service provision to 'leave no one behind'. There is **limited evidence of significant scaling up (influencing higher-level duty-bearers) and scaling out (replication in other localities) (see findings 2, 4, 6, 10).** Theories of change appear to provide little guidance for how this would be expected to occur in contexts of conflict and devolution where local authorities may be accountable within these processes, but national authorities may be disconnected.

There is no need for a standard template for applying HRBA in diverse nexus contexts and development cooperation efforts (see findings 1, 3). Human rights concerns may be glaringly apparent, but HRBA solutions are less so and must be tailored to the dynamics of the conflict and emerging opportunities and obstacles.

Perhaps the greatest area of uncertainty in applying HRBA in a conflict context relates to the extent to which engagement with duty-bearers is possible, viable over time, or even to be encouraged, given the roles they have in perpetrating human rights abuses (see findings 1, 4, 12). This is never a simple calculus and involves numerous judgement calls. HRBA should be seen as a tool to reflect on these calculations, but the answers will never be simple.

Conflict contexts are inevitably characterised by triple nexus challenges as the aid landscape includes a mix of development cooperation and humanitarian assistance. It is often assumed that human rights and humanitarian principles are not easily reconciled. Findings indicate that there are problems, such as when a *do no harm* to humanitarian access and conflict avoidance

runs counter to approaches that demand confronting human rights abuses. Gender discrimination may be rampant and reinforced by the same patriarchal actors that need to be brought into peace-building efforts and who are needed to facilitate access to humanitarian assistance. Findings indicate mixed attention to these conundrums. **Flexible HRBA may provide guidance for some partners, particularly in highlighting human rights red lines, but does not provide a standard roadmap (see findings 3, 13).** There are indications that innovative solutions can be found to such conundrums when responsible parties are held to account while keeping systems open for the provision of humanitarian assistance. Agility rather than set-piece models is needed.

Space has been found within the principles of the HRBA guidance note to engage with partners to better bring the underlying conundrums into transparent discussions (see findings 4, 5, 9). With regard to disability, opportunities to access guidance from experienced partners have been effective for stimulating reflection on where HRBA perspectives related to disability can be developed, with HRBA providing a basis for adopting relevant principles.

The evolving nexus thinking and existing advisory structures in the MFA are, however, insufficient for translating HRBA principles into solutions to the intractable problems in conflict contexts, as evidenced by expressions of irritation. **Conflict awareness needs to be fostered among both the MFA and its partners and better integrated into an HRBA that provides a compass rather than a roadmap (see findings 7, 13).** Partners and MFA staff are, to a large extent, dealing with this and have, in some instances, found impressive solutions. But given the high-risk nature of these environments, a more proactive (but different) role for the MFA may be needed to find where the added value of HRBA can be found. Given the diversity of factors influencing opportunities and obstacles for HRBA application, standard guidance and tools are seen with scepticism. Dialogue rather than templates is needed.

It is essential, though, to recognise that HRBA will never be a panacea (see findings 2, 10, 12). The wicked problems exemplified by the extreme (but not entirely unique) limits to using aid to promote duty-bearer accountability in Syria today are intractable.

4 Lessons learnt

It is important to acknowledge that the nexus is not a template, and HRBA can be a way to open discussions around wicked problems rather than constituting another impossible checklist. **Therefore, tools should be designed for open-ended discussions around these dilemmas as an alternative to a focus on checklists for achieving specific HRBA levels. Coherence demands that Finland finds a reflexive nexus between HRBA and the triple nexus. This is important for development cooperation and for broader links to Finland's overall foreign and security policy.**

An important component of these tools needs to be guidance to move beyond activity-based reporting. Some of the reporting analysed includes excellent human rights and conflict analyses, which suggests that it is possible to transcend reporting focused on needs and responses to include a greater focus on underlying problems. To avoid blind spots and ensure that difficult challenges are confronted, this should bring together joint human rights and conflict analysis.

Guidance is needed, but not more guidelines (given the diversity of contexts, opportunities and obstacles). This suggests the importance of proactively bringing HRBA into the country-level discourse on 'what to do', even where opportunities are limited –particularly regarding duty-bearer engagements– and compromises inevitable. This may require tools for these conversations rather than guidelines for what should be concluded.

Finland's current position as a stable pragmatist regarding engagements with the state in conflict contexts is relevant. **HRBA should be seen as a tool to ask difficult questions and foster foresight regarding different scenarios for engaging with duty-bearers and risks related to doing harm, including how to manage (but not necessarily avoid) inherent conflict-related risks and opportunities.**

As a small donor working amid large and complex (and often humanitarian-dominated) response structures, if HRBA is to achieve added value, it should be focused on specific areas where expertise has demonstrated added value and attitudinal changes. Disability exemplifies such a niche. There may be other opportunities as well, such as the right to shelter emphasised in the work of the West Bank Protection Consortium. If work emphasises more general rights without an explicit emphasis on added values, there is a risk that efforts will not transcend vague platitudes.

Though not unique to conflict contexts, t**here is a heightened risk of investing short-term in addressing deep-seated cultural factors that perpetuate human rights abuses. It is, therefore, particularly important to focus on monitoring the implementation of cultural and societal norm-changing interventions over time.** Too often, theories of change judge success in relation to participatory activities, overcoming discrimination in a single election cycle, or preparation of draft legislation and plans. Joining a peacebuilding committee is not the same as sustaining one. HRBA's added value will only be apparent if structures can be found to look beyond project cycles.

Positive lessons from linking peacebuilding with HRBA (peace with justice) should be actively shared, as should ways to bring together human rights and humanitarian norms. **An important**

aspect of this needs to be an HRBA-informed approach to *do no harm* and conflict sensitivity. Human rights assessments need to be linked to analyses of how different levels of human rights efforts may impact conflict scenarios. These scenarios need to be monitored during implementation, given the uncertainties that prevail in any conflict environment.

MFA should establish a different/parallel advisory structure for conflict countries that can leverage more in-depth *do no harm* analyses and operate as a discussion forum (rather than a gatekeeper), reflecting the uniqueness of every conflict country.

CASE STUDY:
INNOVATIONS AND TRENDS
TOWARDS TRANSFORMATIONAL
PROGRAMMING

1 Introduction

This case study comprises one of seven prepared for the MFA Finland's Evaluation of HRBA in Finland's Development Policy and Cooperation. The other case studies are of (i) HRBA in the context of long-term partnerships, (ii) HRBA in transition contexts, (iii) HRBA in conflict contexts, (iv) HRBA in partnering with multilaterals, where MFA influence is more limited, (v) HRBA in severe headwinds, and (vi) From cross-cutting objectives to HRBA, lessons from disability programming.

The purpose of each Case Study is to apply the overarching evaluation questions, design and methodology of the strategic level evaluation while adapting their analysis for the specifics of the thematic context.

The specific objectives of each case study are:

- To provide a contributory evidence stream to the overall strategic evaluation;

- To help interrogate the wider theoretical framework for the evaluation (see Inception Report) by generating evidence to inform it, and

- To generate Lessons/Implications to help inform MFA stakeholders in their HRBA as part of the constructive approach adopted by the utilisation-focused model of the overall evaluation.

No case study is explicitly a full evaluation of Finland's HRBA in its context, which would be beyond its remit. Accordingly, it does not provide recommendations but rather proposes some lessons/implications to support internal dialogue and learning.

Finland's development policy stresses the need for innovative solutions to promote human rights. The Government Report on Development Policy Across Parliamentary Terms, which lays down Finland's long-term development cooperation objectives, states that "Technological, social and operational innovations and, in particular, digitalisation and the circular economy are major drivers for change" and "provide tools for promoting human rights as well as gender equality and non-discrimination, including the rights and well-being of vulnerable groups" (MFA, 2021e). Past evaluations have recognised Finland's innovative capacity and its commitment to human rights as added values of its development cooperation (Palenberg et al., 2020).

The present study on innovation and trends towards transformational programming is one of seven case studies carried out as part of the Evaluation of the HRBA in Finland's Development Policy and Cooperation. As a case study rather than a full evaluation, this report does not provide a definitive performance assessment of HRBA in Finland's development policy and development cooperation in the thematic context of innovation and trends. Rather, it offers insights to inform the wider evaluation. More specifically, it strives to identify how innovations and trends emerge and can be supported to contribute to human rights-related results and thus add value to Finland's development cooperation. The following questions are addressed:

1. What drives innovation in relation to HRBA?

2. To what extent have HRBA-related innovations been effective, i.e., contributed to delivering human rights-related results?

3. What facilitates and adds value to HRBA-related innovation?

The case study also makes observations on how HRBA innovations and trends relate to risk management. It defines innovation as the *Implementation of new, or not commonly applied, ideas relating to participation, non-discrimination, accountability and transparency that create value from a human rights perspective.* During the inception phase, the challenges in identifying innovations in transformational interventions were noted as a consequence of the limited number of innovations being classified as transformative and as an effect of these interventions rarely containing clearly innovative elements. In some cases, it is also unclear if the innovative approaches identified actually relate to the more transformative aspects of the intervention or whether they instead relate to aspects without a clear or significant human rights angle.

Following a screening of 24 interventions classified by the MFA as transformative, the evaluation team selected ten interventions assessed to contain relevant, innovative elements for a more detailed review. After one of the ten organisations implementing these interventions informed the evaluation team that it did not apply a HRBA and asked not to be interviewed, the number of interventions studied in detail was limited to the nine set out in **Table 7**.

In line with most interventions categorised as transformational, several of these interventions have a global or multi-country focus, and all relate to civil society or multilateral cooperation instruments or to funds for local cooperation. As most of the transformational interventions, regardless of whether they include innovative aspects or not, are CSO or multilateral interventions, this is to be expected. It is possible that other innovative interventions relating to other instruments would have been identified if the case study had not focused on transformational interventions.

In addition to interviews and a document review relating to the nine selected interventions, the evaluation has drawn on a brief desk review of a larger segment of transformative interventions as well as the innovation- and trend-related observations done in the other case studies carried out in connection with the evaluation. The case study has also drawn on interviews with human rights experts unrelated to the reviewed interventions and a literature review.

Table 7. Sample of the case study - innovations

COOPERATION INSTRUMENT	INTERVENTION NAME	COUNTRY	IMPLEMENTED BY
CSO	International Planned Parenthood Federation (IPPF): Core Funding 2021-2022	Global	IPPF
CSO	DefendDefenders Protecting Democratic and Civic Space for Human Rights Defenders	East and Horn of Africa	Defend Defenders
CSO	Finnish Evangelical Lutheran Mission (Felm) Development Cooperation Programme 2022-2025	Multi-country	Felm
CSO	From Disparity to Dignity: Realizing Indigenous & Minority Rights in Development	Global and multi-country	Minority Rights Group International
Multilateral (multi-bi)	Office of the High Commissioner for Human Right (OHCHR)s: OHCHR's Work on Women's Human Rights and Gender Equality[12]	Multi-country	OHCHR
Multilateral	The Lifeline Embattled CSO Assistance Fund	Multi-country	Freedom House
FLC	Defending the rights of Human Rights Defenders: Core support for the implementation of their strategy	Tanzania	Tanzania Human Rights Defenders Coalition
CSO	Promoting People's Right to Information and Freedom of Expression with Free and Pluralistic Media: Vikes Development Programme 2022-2025	Multi-country	Vikes
CSO	Preventing sexual and gender-based violence in Malawi	Malawi	Väestöliitto

Source: Evaluation team

It can be challenging to discuss innovation from the lens of a HRBA, as organisations applying innovative approaches may not have fully reflected on the role of innovations from a human rights perspective. When interviewees were asked about their organisations' innovative ambitions and the results that have emerged from these, many had some difficulties engaging with the questions. The interviews also showed that the concept of innovation is not necessarily easy, or even possible, to distinguish from trends, especially when considering that innovations may not be technical but, for instance, organisational or social.

Nevertheless, the case study shows that a focus on HRBA innovations in transformational interventions can contribute to new ways of working. Sometimes it is also reasonable to assume that these new ways of working, whether categorised as innovations or trends, are contributing to the realisation of human rights.

---

12   The intervention was originally called Promotion of the flagship projects of the Human Rights Strategy of the Finnish Foreign Service

2 Findings

2.1 General issues of direct salience to the case study focus

Finding 1: Transformational interventions are usually grounded in well-tested approaches.

The vast majority of interventions supported by Finland do not purport to be innovative. Most transformative interventions rely primarily on traditional well-tested strategies and activities. Those that strive to apply innovative approaches are typically doing so only in relation to a limited aspect of a larger project.

The reviewed project proposals do not contain any detailed descriptions of specific innovative approaches. Instead, they tend to express general ambitions, often stating a commitment to identifying innovative approaches during the duration of the intervention or creating incentives for or operational environments conducive to innovation. In most cases, reviewed progress reports also provide little information on the extent to which the innovative ambitions have been realised and to what extent they have contributed to the attainment of human rights-related results.

Most of the reviewed innovations take the form of small changes to existing practices. While these changes may be essential and contribute to increased effectiveness, they are rarely ground-breaking. At the same time, some organisations use the word innovation liberally, referring to practices that are fairly well-established as innovative. Presumably, this is done in response to external expectations that new ideas are needed to effectively meet development challenges. It is also common that practices that are described as innovative at the proposal writing stage are considered less innovative once the projects are up and running, as evidenced by interviews and a comparison of proposals and progress reports.

Nevertheless, the collected data also points to a number of contextual and policy-related factors that drive HRBA-related innovation, as shown below in findings 2, 3 and 4.

Finding 2: Developments in international human rights law can drive HRBA-related innovation and trends but are also HRBA-related innovations in and of themselves. Finland has reinforced several such developments and contributed to related innovations.

Changes in international human rights law are important drivers of HRBA-related innovation and trends at the same time as they can be regarded as such innovations in and of themselves. They have led to the establishment of several new projects and initiatives, including several supported by Finland, and have often influenced HRBA innovation and trends for extended periods of time, sometimes decades.

One example is the UN Declaration on Human Rights Defenders, adopted by the General Assembly in 1998, around the same time as the first CSOs and UN agencies started applying the human rights-based approach. Since then, there has been a gradual increase in the attention given to

human rights defenders and how to ensure their safety and security. Organization for Security and Co-operation in Europe (OSCE) (OSCE Office of Democratic Institutions and Human Rights, 2014) and the EU (European Union, 2016) have developed their own guidelines on human rights defenders, and organisations and structures dedicated exclusively to the protection of human rights defenders have been created and new categories of human rights defenders recognised.

Finland supports several national, regional and international organisations dedicated to the protection of human rights defenders and to the creation of innovative models for making the protection more effective. These innovations range from the identification of human rights defenders with special needs that have previously not been given much attention to new models for quickly channelling funding to defenders in need while ensuring an acceptable level of financial accountability. In 2022, Finland further strengthened its commitment to capacitate and protect human rights defenders through MFA's updated guidelines on support to human rights defenders (Ministry for Foreign Affairs of Finland, 2022).

The Convention on the Rights of Persons with Disabilities was adopted in 2008. While Finland and Finnish civil society organisations actively advocated and worked for the establishment of the convention, the convention has also influenced the ways in which organisations funded by Finnish development cooperation are approaching disability issues and, most likely, the degree to which innovative HRBA-related ideas at the project level are tested and implemented. Such ideas supported by organisations operating with Finnish funding range from screen reader software for people who are visually impaired or blind to special software gathering data about the situation of children with disabilities.

Other international law developments that have driven HRBA-related innovation, but not necessarily with the help of Finnish cooperation, include those that relate to transitional justice and impunity for grave human rights violations, the rights of elderly people and, not least, the right to a healthy environment. Considering the increasing role of organisations working in the intersection of rights and climate change, and their engagement in innovative practices, it is notable that they do not play a prominent role among the transformational innovations supported by Finland.

Finding 3: Needs to counter trends of increased discrimination, inequality and shrinking civic space drive HRBA-related innovation.

As noted by Finland's Development Policy Committee, in recent years, a worldwide anti-gender movement has come to constitute a growing threat to the rights of women, girls, and gender and sexual minorities (Development Policy Committee, 2023). As part of a broader anti-human rights movement, the rights of other vulnerable or excluded groups such as children, LGBTI+ people, migrants and religious minorities are also challenged and campaigned against (Euro Child, 2022). In order to counter these forces, civil society organisations, including several supported by Finland, have increased their monitoring of groups opposed to human rights and tried to develop innovative strategies in defence of human rights. As found in the evaluation team's case study on HRBA in Headwinds, where possible, opposition monitoring has included seeking support from allies within government departments, local authorities and other institutions to ensure that those who are opposed to human rights are not hijacking spaces and agendas.

Similarly, growing inequalities and unequal access to public services have, according to interviewees, created an increased interest in developing tools for monitoring public spending and state responsibilities in ensuring social and economic rights, in particular for marginalised communities. As discussed below, such initiatives have been supported by Finland.

Shrinking civic space and funding restrictions have undermined efforts to carry out human rights work in general and to innovate in particular. In many contexts, human rights organisations that criticise the policies or practices of the government are banned from operating or receiving foreign funding and may see their staff members subjected to harassment or violence (CIVICUS, 2022). While these actions have had severe effects on the possibility of carrying out human rights work, they have sometimes also forced organisations, including some in the case study sample, to innovate by, amongst other things developing new funding modalities in restrictive environments and new structures for rapidly supporting human rights defenders at risk.

Finding 4: The Covid-19 pandemic was a major driver of various types of HRBA-related innovations.

The evaluation team's interviews with key informants show that the Covid-19 pandemic was, in several ways, an important driver of innovation. It forced the use of digital technology, which has facilitated participation (but also further marginalised groups and individuals with no or little internet access). The pandemic also increased the prevalence of certain human rights violations (most notably domestic violence) and the need to respond to these. Furthermore, it highlighted inequalities and unequal access to public resources, which in turn has sparked an interest in developing new methods for assessing and strengthening advocacy around economic, social and cultural rights.

2.2   Findings regarding effectiveness

Identifying specific improvements in the situation of human rights as an effect of innovation is challenging for a number of reasons. First, innovations generally tend to be incremental rather than radical, and the effects of innovative practices are often observable only after an extended period of time. Second, the scope of this evaluation, which in terms of duration focuses primarily on funding decisions made during the period 2019-2021, exacerbates the time-related challenges in observing innovation-related results. Third, the limited role innovations play in many projects, including those reviewed by the evaluation team, means that their contributions to results can be difficult to distinguish from the contributions of other project components. An inbuilt challenge is also the fact that innovations are by their very nature new or untested approaches characterised by a high degree of uncertainty as to what can be expected in terms of results.

The assessment of innovation in transformational programming has, however, helped identify what innovation can look like in relation to HRBA and how the innovative approaches have influenced the ways of working on human rights.

Finding 5: Initiatives to set up innovation systems focused on human rights are in themselves often regarded as innovations.

During the past 15 years or so, many development actors, including UN and national development cooperation agencies and CSOs, have paid increased attention to the creation of environments conducive to innovation, including HRBA-related innovations (Wells T., 2023). As indicated by the case study sample, these initiatives to create innovation systems and promote innovation have, in and of themselves, often been regarded as innovations.

Finland's partner initiatives to promote HRBA-related innovation range from special funds to finance innovative ideas to support civil society actors to strengthen their links to private sector actors as a means of finding local low-cost solutions to reaching human rights-related and other objectives. The IPPF Youth Social Venture Fund, presented in **Box 2**.

Box 2. IPPF's Youth Social Venture Fund

IPPF's Youth Social Venture Fund

IPPF established, through its Indian member organisation, Family Planning Association of India, a global Youth Social Venture Fund. The fund supported young entrepreneurs in developing tech-driven innovations aiming at addressing challenges relating to Sexual and Reproductive Health and Rights (SRHR). The fund has given grants to young innovators in several countries to support the creation of apps that give information on contraception options and links to approved providers of services. For IPPF, an innovative aspect of the fund was also that it created a situation in which the organisation and its Indian CSO partner, which are both not-for-profit entities, worked with for-profit ideas and start-ups.

Source: IPPF (n.d.).

As noted in interviews and reflected in project documents, bringing together people from different walks of life in one fora or network can in itself be regarded as an innovation that can help both rights-holders and duty-bearers think in new ways. Some organisations implementing transformational HRBA interventions are part of networks for testing and sharing best practices, such as Fingo's (Finnish Development CSO) Powerbank project focusing on innovation, technical solutions and private sector collaboration.

However, the rapid increase in special innovation hubs seen over the past 10 to 15 years in the international development field seems to have come to an end, and many specialised innovation structures have, in fact, been closed in recent years. Those working on HRBA-related innovations do not seem to be an exception. A challenge for the innovation labs has, according to one observer, been that the meaning of the term innovation is highly ambiguous. As innovation means different things to different people, there are often varying opinions and uncertainty as to what a lab should deliver (Wells, T., 2023). Another challenge, reflected in the literature, is that many micro-level innovations supported through special initiatives to promote innovation have had difficulties scaling up, partly as a consequence of the short-term funding they receive (OECD, n.d.).

Of the innovative projects and structures relating to HRBA set up by organisations supported by Finland, some have had a limited life span. IPPF's special Innovations Programme set up to find new and effective ways to improve people's sexual and reproductive health, was, for instance, closed down, partly due to concerns about its cost-effectiveness. Finland has, however, continued to show commitment to innovation hubs through its support of UNICEF's recently established Helsinki-based hubs focusing on children's right to education and on mobilising resources for innovation and development processes. As noted in the evaluation team's case study on HRBA in cooperation with multilaterals, the hubs have only been operational since 2022, and it is, therefore, too early to assess the degree to which HRBA as an approach will be operationalised. It is also too early to assess the extent to which they will contribute to HRBA-related innovation.

Finding 6: Digital communication and data collection technologies have spread rapidly in recent years and have facilitated participation and democratised human rights work.

Finnish policy documents stress the importance of digital solutions for the promotion of human rights. Most of those interviewed in connection with this study also associate, first and foremost, innovations with the introduction of new technologies in support of HRBA.

In recent years, many organisations in the field of international development cooperation, including Finland's partner organisations, have begun applying digital technologies in new ways. Apart from having started to use common meeting and communication apps and programmes, new tools for the structured collection of human rights-related data and for enhancing the security of human rights defenders have been developed and used in new ways by the organisations in the case study sample.

DefendDefenders has for several years carried out digital security audits for civil society organisations in the East and Horn of Africa, using the so-called Secure Auditing Framework and Evaluation Template for Advocacy Groups (SAFETAG) framework developed by Internews (*About Safetag*, n.d.). Following the start of the COVID-19 pandemic, DefendDefenders has developed a methodology for carrying out such audits remotely. While not technology-driven, it can be mentioned that Finland has also supported another innovative audit system, OHCHR's Gender Accreditation System. According to OHCHR, its offices have, as a result of the system, increased the activities focused on gender equality, allocated a higher budget for such activities, and improved the gender analysis in annual planning processes, monitoring and reporting, and communication (United Nations Human Rights, n.d.).

Digital solutions have made it easier for organisations to stay in contact with other actors of relevance for their operations, including members and constituencies, and to engage in evidence-based advocacy as legitimate representatives of larger groups of rights-holders. The case study sample indicates that the goal or challenge is not to develop new technical solutions to ensure improved access to digital services, but to ensure that existing technical solutions are effectively utilised.

The Felm has traditionally carried out an annual programme review attended by its Helsinki-based staff. The use of digital communication tools has opened up the possibility of engaging a much broader range of staff and partners in these reviews. The use of such tools has also made it possible to organise peer-learning opportunities in which partners from different locations and countries can exchange experiences and learn from each other in a new way. One interviewee noted, however, that peer-learning approaches can be time-consuming and that competition for funding amongst participating CSO can create limits as to their effectiveness. More participatory follow-up through satisfaction surveys amongst members has also been used by partners, including Tanzania Human Rights Defenders Coalition (THRDC).

Interviewees note that there is an increase in local-level organisations using social media in a strategic manner and that this has contributed to democratising human rights work and often to reducing its costs. Social media has made it easier to expose those who violate human rights and contributed to the creation of spontaneous movements mobilising around particular issues at the local level, often for a limited period of time.

Importantly, technical innovations can facilitate the inclusion of people with disabilities, or people, especially women, who are not able to leave their homes and travel to attend training and meetings. Innovations can also provide remote and marginalised communities better access to health services and education opportunities. Felm has supported the development of app-based technology for

mental health awareness raising and the provision of virtual psycho-social counselling to migrant workers. IPPF and its member associations have used digital platforms for a variety of things, from dissemination of information to counselling. They have noted that the pandemic triggered a surge in the use of these platforms but also that it is essential to involve marginalised groups in their design and promotion to make them truly user-friendly.

Finding 7: Civil society organisations have developed new strategies and strengthened their capacities to monitor and counter increasingly influential actors opposed to human rights generally and the rights of women, children and LGBTI+ people in particular.

In recent years there has in many parts of the world and in many organisations been a shift in how advocacy and protection strategies are carried out. This shift is grounded in several new ideas that can be considered innovative. Organisations included in the case study sample have, for instance, increased their focus on research, political economy analysis and evidence-based advocacy. The concerned organisations see this as necessary steps towards addressing existing, and often growing, opposition to their work and values and human rights more generally. IPPF has established a special Countering Opposition Centre, which monitors anti-gender discourses, shares intelligence, devises counter-narratives, develops security strategies, and conducts advocacy campaigns.

Finding 8: Broader and more diverse advocacy coalitions are established to make advocacy actions more effective.

The case study sample and key informant interviews indicate that there is a trend towards wider and more inclusive advocacy coalitions. THRDC, supported by the Embassy of Finland in Tanzania, has been coordinating a civil society Working Group on Civic Space that brings together different civil society actors, including representatives of human rights organisations, media and the private sector, around a common goal. The Finnish Foundation for Media and Development, Vikes, is striving to encourage its partners to increasingly take part in advocacy work as a way of fighting shrinking civic space in partner countries. At the same time, Vikes is aiming to strengthen its own advocacy efforts by working in closer cooperation with international media development organisations, Finnish CSOs and the MFA and embassies.

Another indication that the attention to coalition building, representativeness and participation may be growing in prominence is that some umbrella organisations, which have other CSOs as their members, are growing their membership and seeing this as a way of increasing their legitimacy and their weight in terms of advocacy. THRDC grew from having 14 member organisations in 2013 to having more than 130 in 2017 and 249 members in 2023.

Finding 9: Rights-holder organisations are increasingly supported to protect and promote the rights and interests of their constituencies.

Generally, donor-supported CSOs, including in the field of human rights, are rarely organisations with a substantial number of individual members ultimately in charge of the organisation's governance. A challenge for most cooperating CSOs and their advocacy work is thus that they are not formally representing a larger constituency, i.e., one that stretches beyond the staff and board of the organisation It is also rare that organisations are managed by the constituency they are striving to assist. However, some transformational interventions supported by Finland are explicitly aiming to assist disadvantaged groups to claim their own rights. Such support to rights-holder-led organisations operating at the grassroots level appears to be increasing and is, in some contexts, regarded as innovative. In Indonesia, Lifeline, a Freedom House-managed civil society coalition set up to provide support to human rights defenders, has supported two grassroots environmental

organisations in establishing a security training programme for local CSOs. The organisations have also established a rapid response unit made up of local CSO representatives to act on security incidents involving other local defenders.

In relation to rightsholder organisations, it is also relevant to note the increased focus on trade unions as essential actors for democratic development, seen, for instance, in US foreign policy (Tharoor, I., 2023). However, the Finnish Trade Union Solidarity Centre (SASK) has for many years worked to strengthen trade unions and their membership structures.

Finding 10: The attention paid to international human rights mechanisms as tools for addressing rights concerns is increasing amongst human rights CSOs.

Over the years, the prominence of international and regional human rights mechanisms, such as the UPR and the UN treaty bodies, have grown in importance for many local human rights groups, serving as mechanisms for bringing local and national level concerns to the international level and for bringing international concerns to the national and local level. Around these mechanisms, new broad-based civil society advocacy coalitions and working groups have been established in many countries, in particular around the development of so-called shadow reports, i.e., civil society reports prepared as alternatives to official government reports.

Several of Finland's partner organisations, including DefendDefenders, have played an active part in facilitating local civil society organisations and rightsholders' engagement with international human rights mechanisms. In 2021, THRDC coordinated the Tanzanian civil society's joint shadow report to the UPR, a process in which more than 200 local CSOs participated. A majority of the recommendations put forward were accepted by the government.

Finding 11: New models are developed for CSOs in restrictive environments, for quickly providing support to human rights defenders at risk, and for assisting organisations with non-traditional structures.

To ensure the existence of vibrant civil societies that facilitate public participation and hold duty-bearers to account, flexible strategies for cooperating civil society actors operating in restrictive environments have been used in recent years. New strategies for cooperation with non-formal organisations and for quickly channelling financial support to human rights defenders at risk are also developed by several of Finland's partner organisations.

In some cases, there seems to be a partial return to the more flexible funding models applied in restrictive environments some decades ago. There are also arrangements in which foundations, organisations and private donors with less stringent requirements on how donated funds are used and reported are relied on as intermediaries. When one Finnish partner organisation had its accounts frozen on grounds widely believed to be politically motivated, donors and international CSO explored possibilities of directly taking over some of the organisation's financial responsibilities, such as office rent. They also considered using alternative accounts belonging to other organisations and to individuals for channelling support.

Social movements and loosely formed issue-based ad-hoc groups without formal structures, clear leadership and official registration, have become increasingly important civil society actors in defence of human rights in many contexts. How to effectively support these groups while ensuring financial accountability is a challenge for many donors. Lifeline has set up a special fund to support local actors with limited financial management capabilities. These actors are often supported through a financial sponsor, a local organisation with better-developed systems for financial

accountability. IPPF has, through its Moroccan member organisation Association Marocaine de Planification Familiale, established the so-called Social Movements Centre, which provides grants to social movements in various parts of the country. It also provides capacity development, fund-raising and networking support.

Finding 12: New initiatives and methods, often built around the collection and use of dis-aggregated data, are implemented to revitalise social and economic rights.

As noted in the evaluation team's interviews, in recent years, there have been attempts at revi-talising the work on economic, social and cultural rights, and efforts have been made to find new methods for assessing and promoting these rights. The importance of disaggregated data, which allows for an assessment of which groups make use of public services and which groups cannot access such services, is underlined in the Finnish HRBA guidance note. According to interviewees, efforts to use such data have gained momentum as a consequence of the Covid-19 pandemic, which in many countries increased the general public's interest in better understanding the link between taxation and public services and between public services and human rights.

Interviewees have argued that the pandemic revealed a need to make the link between human rights, politics, and economic policy more explicit. In his most recent report to the UN Human Rights Council, UN High Commissioner for Human Rights Volker Turk promoted the idea of a "human rights economy", i.e., an economy in which "the aim of advancing human rights informs all national economic, fiscal, monetary, investment and business decisions", stating that such measures would "bring immense benefit to millions of people" (Türk V., 2023).

A number of CSOs are playing a central role in the human rights economy discourse and, in par-ticular, the taxation and human rights conversation. While Finland may not support the most vocal organisations, it does cooperate with several actors that are working to revitalise the work on ESC rights and , in some cases, doing so innovatively. Through its cooperation with the Minority Rights Group International (MRG), Finland has supported the application of the so-called OPERA framework, which is an example of an innovative approach to collecting and using disaggregated data which, among other things, have helped MRG and its partners make the link between local challenges and national policies more explicit. Otherwise, the right to education is perhaps the ESC right in which human rights-based innovations have played the most significant role (**Box 3**).

Box 3. Innovation in education

> **Innovation in education**
>
> The present evaluation did not include in the sample assessed interventions relating to Fin-land's development cooperation in the area of education. However, education is arguably one of the sectors in which HRBA has been most successfully applied and a strong consensus on what rights-based education entails has emerged. Education is also an area in which a range of innovative HRBA-related projects have been applied over the years, including child-friendly school projects, mother tongue-based learning, school feeding programmes, and mobile schools and barefoot teachers that help address issues of access to education for marginalised and disadvantaged people. UNICEF and other organisations supported by Finland have promoted these practices.
>
> *Source: Evaluation team, and Seamo Innotech (2017). Scoping Study into Human Rights-Based Approaches to Human Rights in Southeast Asia, 2017*

2.3   Findings related to added value

This section discusses organisational features that facilitate, and thus add value to, HRBA-related innovation and trends.

Finding 13: Organisations with access to flexible resources and a broad network of partners are well-placed to add value to HRBA-related innovation and trends.

Observers have noted that larger organisations are often better placed to innovate than smaller organisations (Winniecki, E, 2021). This appears to be true also for HRBA-related innovation. There are several reasons for this. One reason is that larger organisations often have better access to flexible resources not strictly earmarked for particular activities. Another is that larger organisations, with a broad network operating in a variety of contexts, may be better placed to spread learning and facilitate scaling up. As noted in a Fingo report, "*lower budgets can often restrict an organisation's ability to implement pilot programmes to try out a new technological approach or digital solution, and funder requirements about reporting, longer planning cycles and measurable results can also pose additional challenges for "falling forward" and agile programming*" (Winniecki, E, 2021).

There is, however, a general challenge in scaling up successful micro-level innovations. Many innovations are designed to address context or organisation-specific problems. There may thus be few reasons for the concerned organisations to share their experiences. In the literature, it is also pointed out that there is limited knowledge about the extent to which innovative practices are actually spreading. An explanation for this is that there are few efforts aiming at studying the longer-term effects of innovations and to what extent they are used by others, which is, in turn, partly a consequence of the short-term nature of development funding (OECD 2020).

However, some of the organisations with a broad network of partners or member organisations are paying particular attention to learning and sharing successful and innovative practices. In IPPF, the issue of bringing good innovative practices to scale is given attention through its centres of excellence. In Togo, Association Togolaise pour le Bien-Être Familial's Centre of Excellence is, for instance, systematising its knowledge in order to share the latest thinking and best practice in SRHR throughout West Africa. However, peer learning also takes place outside IPPF's centres of excellence. The Reproductive Health Association of Cambodia (RHAC), an IPPF member organisation, has shared its experiences with digital health technology to improve access to and information about self-managed medical abortion with organisations in Africa.

The importance of sharing experiences is also stressed by the Finnish organisation Väestöliitto, which in its project document, reflects on the need to ensure that its partner organisation Center for Youth Empowerment and Civil Education (CYECE), will learn through its networks and alliances. It also discusses possibilities for CYECE to share lessons learned, also among duty-bearers.

However, scaling up innovations is also dependent on organisations and actors being prepared to use innovations developed by others and adapt them to their own operations, something which often requires iterative learning. The Center for Economic and Social Rights (CESR), an international CSO aiming to "harness the power of human rights to inspire fairer and more sustainable economies", has developed the above-mentioned OPERA framework, a comprehensive framework to assess a state's obligation to fulfil economic and social rights. MRG has successfully used the framework to increase the effectiveness of its monitoring of economic and social rights. MRG has also worked with CESR in spreading the reach and impact of CESR's innovative online application, the Egypt Social Progress Indicators.

Finding 14: Traditional human rights organisations, often with a strong focus on civil and political rights, may not be the organisations most effectively adding value to HRBA innovations and trends.

In the literature, it is argued that traditional human rights organisations, many of which have primarily focused on civil and political rights, have often shown little interest in adopting a human rights-based approach to their operations (Knuckey S. and Satterthwaite M, 2021). Thus, their contribution to HRBA-related innovation is limited. Amongst the organisations identified as innovative by the evaluation team are organisations working on SRHR, Human Rights Defenders, people living with disabilities and economic and social rights.

2.4   Findings regarding risk management

Finding 15: Cooperating organisations recognise that new innovations and their application may cause harm, but structured in-depth assessments of the potential negative consequences of innovations are not carried out. Strong local partnerships and special initiatives to address online harassment are, however, mitigating risks.

The risks associated with technological solutions and digital developments are underlined in the MFA report on Development Policy Across Parliamentary Terms 2021, which stresses the importance of ensuring that such developments do not undermine democratic progress and human rights (MFA, 2021e). *Do no harm* argues that development actors need a deep understanding of the political economy of the contexts where they are operating. The sample for this case study indicates that *do no harm* and a strong contextual understanding is generally achieved by Finland's partners through stable partnerships with local actors with a sound understanding of local contexts. Structured in-depth assessments of the interventions from a *do no harm* perspective appear, however, to be rare or non-existent.

Of the innovations reviewed by the evaluation team, none appear to have had direct negative implications from a human rights or democracy perspective. However, several interviewees, including those who themselves are involved in developing digital tools, highlight the fact that the digital revolution spreads unevenly. People living in poverty and those who are otherwise marginalised may not have internet access and access to the technology needed to make use of the opportunities provided through digitalisation. They may therefore miss out on capacity development opportunities or opportunities to make their voices heard and participate in democratic processes and thus become further marginalised.

One way of mitigating these effects is to ensure that the shift to online technologies is gradual and old low-tech approaches are not abandoned but maintained as a complement or alternative. There are also examples of partners taking action to work more directly with digital rights issues and the risk of causing harm through digital innovations. The Safe Sisters Programme, which DefendDefenders run in cooperation with Internews and Digital Society, is raising the capacity of women human rights defenders to respond to digital security challenges, including cyber harassment and bullying, that keep them from being safe online.

Innovative tools for the collection of disaggregated data and structured context assessments are not only contributing to more effective advocacy efforts. Some such tools can also help strengthen conflict assessment and related risk management. As described in the case study on HRBA in

Conflicts, the West Bank Protection Consortium uses an index that helps prepare for possible human rights violations, in particular forced evictions.

As shown in the evaluation team's case study on HRBA in Headwinds, in places where it is sensitive to be engaged in explicit human rights activities, many organisations are managing to conduct and support human rights-related work by framing it in socially acceptable or politically less sensitive, terms, while remaining true to the underlying human rights principles. One organisation supported by Finland has given its innovative approach to measure progress on fulfilling socioeconomic rights a developing framing to mitigate the risk of conducting human rights work.

Finding 16: Finland supports innovation risk management through the provision of flexible funding arrangements.

Innovation is inherently risky in the sense that it is difficult to predict its results and that the risk of not achieving expected outcomes is high. It is commonly recognised that flexible funding and management models are essential for innovation. Interviewees argue that organisations that can access funding that is not earmarked for particular activities are better placed to test new ideas and adapt their plans in ways that facilitate innovation and make it possible to scale up initiatives that are successful. In relation to the nine transformative interventions particularly focused on in this case study, Finland's support is characterised by flexibility, typically being provided either as core support or programme support. Funding is, in none of the cases, narrowly earmarked for a particular set of activities, and informants generally perceive MFA to understand that innovation and effective project implementation require an approach that allows for adjustments and adaptation. It was mentioned, however, that innovation could benefit from MFA better explaining its flexible and adaptive approach to its partner organisations.

Finding 17: MFA does not focus on innovation in its monitoring and follow-up of interventions.

At the same time, there are few indications that MFA has explicitly encouraged innovation and risk-taking. In their funding applications, several of the organisations categorised as transformative have briefly described their innovative approaches or, more commonly, aspirations. There are examples in which the organisation's innovative ideas or approaches have been reflected on and documented during MFA's assessments of their funding proposals. However, reviewed documentation and interviews with supported partner organisations and MFA staff indicate that MFA has not directly encouraged or followed up on the organisations' plans in terms of innovation.

3 Conclusions

In interventions of a transformational nature, **innovative approaches are primarily observed in interventions implemented by CSOs, funded under the CSO or FLC instruments, or amongst UN agencies, funded under the multilateral instrument.** Interventions and new trends are often triggered by changes in international human rights law, increased needs to counter opposition to core human rights principles, such as gender equality and non-discrimination, and changes in the immediate environment in which organisations operate, such as freedom of association restrictions and the effects of the Covid-19 pandemic (see findings 2, 3 and 4).

The Covid-19 pandemic created and highlighted a need for innovation in serval areas. It contributed, among other things, to a dramatically increased use of digital communication strategies, which facilitated participation in many cases, but also marginalised some groups further. It created a need to more effectively address human rights violations that became more common or visible during the pandemic. It also highlighted the inability of many governments to ensure economic and social rights, which led to an increased interest in new strategies for monitoring the use of public resources and in developing effective advocacy strategies around these rights (see finding 4). Even though the pandemic resulted in, and laid the foundation for, some radical changes in how development interventions are implemented, the case study indicates that innovations are more often incremental than radical and that it is often difficult, and sometimes of little relevance, to distinguish innovation from broader human rights and development trends (see findings 2, 3 and 4).

The case study shows that innovations can play an important role in transformational programming but also that most transformational interventions rely on well-tested strategies and activities (see finding 1). To the extent innovations have strengthened the application of HRBA, they have done so by strengthening civil society organisations and the capacity and voice of rights-holders. They have also contributed to more participatory and transparent development processes. **There are very few innovations and new trends focusing on enhancing the ability of duty-bearers to live up to their human rights obligations**, which may be an effect of the high degree to which transformational innovations are implemented by CSOs (see findings 3, 5, 6, 7, 8, 9, 10, 11 and 12).

Finland supports HRBA-related innovation and promising trends mainly through its very decisions to fund organisations applying for innovative approaches to transformational programming. **There are few indications that it has encouraged or focused on innovative practices in its monitoring and follow-up of interventions** (see findings 16 and 17).

While many of the cooperating organisations' innovations have so far had a modest immediate effect on the enjoyment of human rights, they are part of broader trends to ensure a stronger focus on disadvantaged and marginalised groups in development processes and to counter forces opposing gender equality, children's rights, democracy and a vibrant civil society (see findings 1, 6, 7, 8, 9, 10 and 11).

The case study sample gives no indication that HRBA-related innovations have had any significant negative effects from a human rights perspective, but innovation necessarily comes with significant risks of not achieving the results hoped for (see finding 15). Thus, **innovative approaches**

require donors that are prepared to accept a level of risk. It also requires donors that are willing to provide flexible funding arrangements that allow for long-term and iterative learning processes as well as dissemination and scaling up of successful innovation attempts. MFA meets several of these requriements, but could better explain to its partners that it understands that innovation may require adaptation and that it is prepared to accept changes to implementation plans if such changes are necessary to promote and test innovative approaches (see findings 13 and 16).

4 Lessons learnt

HRBA-related innovation and trends are primarily driven by contextual factors that are largely beyond the control of MFA and other donors. There are, however, actions donors can take to facilitate innovation. Most importantly, **flexible funding arrangements that allow for an iterative learning process and for successful innovations and promising trends to be scaled up and spread are needed.**

There are few innovative approaches that strive to engage duty-bearers as actors in need of enhanced capacity to protect and fulfil human rights obligations. While the present study has not assessed the capacity-development needs of duty-bearers, there might be room for interventions that consider the degree to which such needs exist and how innovative approaches can potentially help.

Organisations striving to contribute to HRBA-related innovation should ensure that they have structures for sharing their experiences and for learning from and drawing on approaches developed by others. They should engage with actors outside of their own organisation and sector, including entrepreneurs, think tanks, CSOs and actors with knowledge of the local context. As the idea of specialised innovation hubs and labs is losing some of its appeal, attention should be paid to how an organisation-wide culture of cooperation and innovation is established. Donors should explore how funding mechanisms can support such cooperation rather than undermine it.

There is room for MFA to pay greater attention to issues of innovation when assessing funding proposals and, in particular, in monitoring and follow-up of interventions. Partners implementing innovative approaches should be requested to provide detailed updates, in their regular reporting to MFA, on how the innovations are progressing and what efforts or plans have been made to ensure that successful innovations are disseminated amongst relevant stakeholders. MFA should also encourage innovation by making innovation ambitions a regular dialogue issue in its follow-up meetings with supported organisations. It should also more explicitly communicate its understanding that innovation may require adaptive and flexible approaches to intervention implementation.

CASE STUDY: HRBA IN PARTNERING WITH MULTILATERALS, WHERE MFA INFLUENCE IS MORE LIMITED

1 Introduction

1.1 Increasing multilateral cooperation affects MFA's role in promoting HRBA

Multilateral development cooperation has had an important role in Finland's development policy and cooperation for decades. Since 2016 the share of development funding channelled by Finland to multilateral organisations through core funding, earmarked global-level funding, or multi-bi co-operation has continuously increased. According to the latest Development Policy Results Report in 2019-2021, already some half of Finland's development cooperation budget was channelled through international organisations and the EU, excluding multi-bi cooperation with multilateral organisations at the country or regional level (MFA, 2022a).

According to the Report on Development Policy Across Parliamentary Terms (MFA, 2021), cooperation with multilateral organisations is one of the cornerstones of Finnish development policy. On the one hand, it enables Finland to contribute to the strengthening of the multilateral rules-based international system and its operational capacity. On the other hand, the report states that *'through multilateral actors, Finland is able to have a larger impact on sustainable development and promote the realisation of values and principles that are important to Finland'.* Hence, the realisation of human rights being a key goal of Finland's development policy, multilateral organisations can be considered to have a major role also in Finland's HRBA implementation.

While especially the UN Agencies, including UNFPA, UN Women, and UNICEF, as Finland's biggest UN partners, have been forerunners in the development of HRBA and have a strong organisational level commitment to HRBA, the HRBA ambition levels in Finland's multilateral partners' work vary greatly as assessed in connection to MFA's funding decisions. While there are partners whose work has been assessed as human rights transformative, still a clear majority of the multilateral development cooperation funded by Finland (75 % of funding decisions in 2019-2021) is currently classified by MFA as human rights sensitive (Development Policy Committee, 2023). This variation was also reflected in some scoping interviews in the inception phase of this evaluation, indicating a degree of uncertainty and discomfort regarding the ability of MFA to ensure that certain partners are able or willing to apply HRBA.

The channels and means for MFA to promote its priorities in multilateral interventions and the core work of the cooperating organisations differ significantly from Finland's intergovernmental bilateral or CSO cooperation, where MFA is in a stronger position to set requirements and give recommendations for the implementing partners. While in country or regional level multi-bi interventions, MFA may play an active role in the actual planning and monitoring, in relation to core funding or other global level funding to multilateral organisations MFA's role is more characterised by policy level influencing that takes place through different channels. Influencing is done through governance, e.g., in the Constituencies of International Finance Institutions (IFI), in connection to fund allocation processes, and sometimes through staff placements. There are also other formal or informal channels for influencing, such as high-level meetings and consultations, advocacy and political support, e.g., campaigns and activities related to generating and exchanging knowledge (Palenberg et al.,

2020). The importance of influencing work in promoting HRBA in Finland's multilateral cooperation is also highlighted in the MFA Guidance note on HRBA (MFA, 2015).

Since 2012, the MFA has used influencing plans as frameworks for planning, implementing, monitoring, and managing cooperation with the main multilateral partners. (Palenberg et al., 2020) In the most recent influencing plans prepared in 2020 and 2021m attention has been paid to a more focused approach by defining MFA's joint objectives for all influencing with multilateral organisations. The following longer-term objectives were based on the development policy priority areas, cross-cutting objectives, human rights-based approach, and results-based management.

The multilateral partners funded by Finland are expected to:

1. promote in their work gender equality and the rights of persons with disabilities
2. increase their support for inclusive, quality education
3. support the transition to low-emission and climate-sustainable development and
4. use innovations in their own work and support innovations and/or responsible businesses in developing countries.

1.2 Purpose of the case study

The purpose of this case study was to analyse how and to what extent MFA has introduced and promoted HRBA in its cooperation and dialogue with multilateral organisations in global-level strategy, policy and monitoring processes related to core funding and other global-level interventions in comparison to the country or regional-level multi-bi interventions. The analysis looked into supporting and hindering factors within partner organisations and MFA affecting effective monitoring of HRBA implementation in multilateral interventions, as well as dialogue and influencing on HRBA. It also aimed at identifying opportunities for further developing and strengthening MFA's role in promoting HRBA in its cooperation with these multilateral partners.

1.3 Methods and sample

In line with the purpose of this case study, the overall methodology focused on qualitative analysis of data collected through desk review and key informant interviews. To gain a general level understanding of how and to what extent HRBA is reflected in Finland's cooperation with different types of multilateral organisations a light-touch desk review of intervention-level documents as well as supported organisations' HRBA-related policies and guidelines was conducted. Furthermore, MFA's influencing plans and reports related to the organisations included in the case study sample were analysed to get an insight into how HRBA has been reflected in MFA's influencing priorities and related achievements.

The sample of interventions covered different types of multilateral funding (core funding, multi-bi projects, multilateral thematic funding, funding to International Finance Institutions (IFIs) and trust funds) and different types of multilateral partners, including UN agencies, IFIs, and the Green Climate Fund. In line with the scope of the evaluation, the case study didn't cover EU development policy and cooperation and Finland's related influencing work. Information on the case study interventions can be found in **Table 8**.

Based on the findings from the desk review, key informant interviews were conducted with MFA stakeholders responsible for cooperation with multilaterals and related influencing work and multilateral partner stakeholders responsible for cooperation with Finland in general or in relation to HRBA. The interviews with partners included both multilateral organisations with a strong commitment to HRBA and strengthening its systematic implementation, as well as organisations lacking or having a much weaker commitment to HRBA and its implementation.

In total 23 key informant interviews were conducted: 13 interviews with MFA staff involved in dialogue or influencing with multilateral partner organisations and 10 interviews (14 interviewees) with representatives of multilateral organisations.

As a case study rather than a full evaluation, this report doesn't provide a definitive performance assessment of HRBA in Finland's development policy and development cooperation in transition contexts. Rather, it offers insights to inform the wider evaluation.

Table 8. Sample of the case study - cooperation with multilaterals

COOPERATION INSTRUMENT	INTERVENTION NAME	COUNTRY/ REGION	IMPLEMENTED BY
Multilateral (core funding)	Core funding contribution to UN Women	Global	UN Women
Multilateral (core funding)	Core funding to African Development Bank	Africa	African Development Bank (AfDB)
Multilateral (replenishment)	African Development Fund (ADF), ADF-15 Concessional Donor Loan	Africa	ADF
Multilateral (core funding)	Core funding contribution to Green Climate Fund	Global	Green Climate Fund
Multilateral (thematic)	Establishment of innovation hubs in Finland	Global	UNICEF
Multilateral (thematic)	Human Rights, Inclusion and Empowerment Trust Fund	Global	World Bank
Multilateral (thematic)	Finland's support to the Enhanced Integrated Framework (EIF)	Global	EIF Partner Agencies / UN Secretariat
Multilateral (multi-bi)	INT/Aid for Trade in Central Asia	Central Asia	United Nations Development Programme (UNDP)
Multilateral (multi-bi)	Women and Girls First Programme in Myanmar	Myanmar	UNFPA
Multilateral (multi-bi)	Sudan Family Support Programme (SFSP)	Sudan	World Bank
Multilateral (multi-bi)	Enhance women's roles in influencing the political process and contribution to peace building in Libya	Libya	UN Women

Source: Evaluation team

2 Findings

2.1 Findings regarding effectiveness

The evaluation team analysed the sample interventions by coding data from the available progress reports and other relevant documents, as well as key informant interview notes against evaluation indicators on key elements of HRBA. This analysis indicates clearly that the level of HRBA implementation varies greatly among Finland's multilateral partners and MFA-funded multilateral interventions. **Table 9** gives a rough overview of how different elements of HRBA at the human rights sensitive, progressive and transformative levels are reflected in the analysed interventions.

This section of the report describes factors affecting the level of HRBA implementation and the possibilities of its assessment in different kinds of MFA-funded multilateral interventions. Analysis of these factors is, on the one hand, essential for understanding opportunities and challenges in achieving more advanced, i.e., human rights progressive and sensitive levels of HRBA ambition, in Finland's development cooperation. On the other hand, these factors also have direct implications for Finland's HRBA-related influencing work in multilateral partner organisations and interventions.

Table 9. Desk review-based analysis on how the levels of HRBA implementation are reflected in the sample interventions

INSTRU-MENTS	HRBA AMBI-TION LEVEL IN MFA FUNDING DECISIONS	HRBA IMPLEMENTATION AS REFLECTED IN REPORTING		
		SENSITIVE	PROGRESSIVE	TRANSFORMATIVE
Core or thematic funding, or loan (UN, World Trade Organiza-tion (WTO), IFIs) (7 inter-ventions)	4 sensitive, 2 progres-sive, 1 trans-formative	• Principles clearly (2) or partially (2) reflected. • Principles weakly reflected (3) • Attention to *do no harm* (3) • International Finance Coalition (IFC) perfor-mance standards and to some extent human rights reflected in safe-guards / risk manage-ment, but no related reporting (3)	• Includes expected re-sults furthering the re-spect, protection, or fulfilment of human rights (3) • Strengthened capac-ities of duty-bearers / rights-holders (3) • Disaggregated data (1)	• Addressing root causes of discrim-ination, and em-phasis on capaci-ty development and advocacy (1)
Multi-bi inter-ventions (4 inter-ventions)	1 sensitive, 3 progres-sive	• Poor attention to *do no harm* (1) • Principles clearly (3) or partially (1) reflected. • Attention to *do no harm* (3) • IFC performance standards guide risk assessment and man-agement (1)	• Includes expected re-sults furthering the re-spect, protection, or fulfilment of human rights (3) • Strengthened capac-ities of duty-bearers / rights-holders (2) • Disaggregated data (4)	• Addressing root causes of discrim-ination, and em-phasis on capaci-ty development and advocacy (1)

Source: Evaluation team

Finding 1: Differences in the organisational level commitment to HRBA are one of the main factors affecting the level of HRBA implementation in the work of multilateral partner organisations. While the strong organisational level of commitment to HRBA is clearly reflected in the plans and reports of UN Agencies, HRBA implementation in IFIs is strongly affected by the prohibition of political activities.

The analysis of the case study interventions shows that organisational-level commitment to HRBA is clearly reflected in the actual HRBA implementation in multilateral partners' global operations or specific interventions. The United Nations (UN) explicit **commitment to HRBA** as an approach guiding all operations and efforts for achieving the UN Sustainable Development Goals (SDG) is visible in all analysed interventions implemented by different **UN Agencies,** even though there are differences in the levels of ambition in HRBA implementation. Likewise, the lack of explicit commitment to and adoption of HRBA as an approach by the IFIs, as well as other global organisations, programmes, or other initiatives like the Green Climate Fund and EIF, is also clearly reflected a lack of or weak attention paid to the key elements of HRBA in the analysed interventions.

The commitment to HRBA is clearly visible in the UN Women's global strategic plan and reporting on results. The global level reporting reflects the organisation's triple mandate of a) strengthening global norms and standards for gender equality and women's empowerment, b) promoting coordination and coherence across the UN system on these issues, and c) supporting Member States in regional and country level efforts regarding gender equality and women's empowerment in legislation, policies, and strategies. These three areas of work are in line with the HRBA, and related concrete examples of achievement are provided. Increasing awareness and application of human rights norms (with emphasis on the Convention on the Elimination of All Forms of Discrimination Against Women, CEDAW) and the principles of participation, inclusion, non-discrimination, and accountability are at least to some extent reflected in reported results (UN Women, 2022).

The organisational level commitment to HRBA is also reflected in the analysed multi-bi and multilateral thematic interventions implemented by UN Women, UNFPA, UNDP and UNICEF, even though the extent to which the human rights norms and principles have guided the focus and processes of these interventions varies significantly due to factors, e.g., related to the thematic focus described further below.

In the case of **the IFIs**, the HRBA implementation is directly affected by the fact that even though these organisations have made commitments to respect human rights in their operations as reflected in their safeguards systems and policies (The World Bank Environmental and Social Framework, AfDB Group's Integrated Safeguards system, Policy Statement and Operational Safeguards), they have not adopted HRBA as an approach as such. In the World Bank (WB), the AfDB and the ADF managed by AfDB, the HRBA and especially the human rights principle of accountability and the related emphasis in the approach on addressing gaps in the capacities of states and governments in fulfilling their human rights obligations is seen to be in contradiction with the prohibition of political activities contained in the Banks' Articles of Agreement (IBRD Articles of Agreement, Article IV, Agreement Establishing the African Development Bank, Article 38). This principle of not interfering on issues that could be considered as member states' domestic politics is strongly reflected in both WB's and AfDB's discussions and decision-making, and also in the ways how the Constituencies raise issues in these discussions, as brought up by several interviewees.

Regarding the AfDB, the lack of explicit commitment to HRBA is reflected as a lack of even implicit reference to human rights norms or principles in reviewed documents. However, the human rights principles are better reflected in the work of ADF. The strategic plan of ADF gives strong emphasis

to the empowerment of women and youth, and attention is also paid, e.g., to children, migrants, persons with disabilities and refugees as marginalised groups. Still, addressing the needs of these groups are not linked to related human rights norms, and the only identified reference to aims of strengthening the capacities of duty-bearers was related policy dialogue on women's rights (MFA, 2021e).

The commitment of the World Bank Group to ensure respect for human rights in its operations and interventions is reflected in the multi-bi intervention SFSP, e.g., through systematic analysis of the Social and Environmental Performance Standards of the IFC and related human rights risks and emphasis on gender equality and targeting of youth, women, and the most vulnerable populations. However, the HRBA is much more strongly reflected in the Human Rights, Inclusion and Equality (HRIE) Trust Fund, which has been a key channel for Finland and other Nordic countries to promote HRBA in the WB.

The HRIE Trust Fund supports strengthened incorporation of human rights in analyses and implementation of WB operations receiving Trust Fund grants. Furthermore, it builds the capacities of WB staff and management on human rights in development and develops internal and external partnerships on these issues. The grants have included projects with a specific focus on strengthening the capacities and inclusion of rights-holders from marginalised groups. The Trust Fund aims at strengthening the capacity of the World Bank, the government, and other stakeholders to incorporate human rights in different development initiatives and processes. It has also contributed to the strengthening of WB grievance mechanisms and remedy as an important aspect of accountability in WB operations. However, the challenge related to the principle of accountability limits the Trust Fund's possibilities to systematically address root causes of discrimination or promote related strategic policy dialogue. Furthermore, taking into consideration the short-term nature of the Trust Fund's grants and its role in building the capacities of WB on human rights, actual improvements in the realisation of human rights are not reported.

Lack of explicit commitment to HRBA as an approach is also reflected in the strategies, plans and reporting of the GCF and the EIF as a lack of explicit reference to human rights norms and, in the case of GCF, also to the human rights principles. Neither of these interventions is affected by similar prohibitions of addressing states' human rights obligations. However, even though the GCF has explicitly committed to respect and observance of human rights, and this commitment is further specified in its policies on gender and indigenous peoples (Green Climate Fund, 2022), in interviews it was brought up that issues considered as political are largely avoided in discussions and decision-making in GCF that is also reflected in very limited explicit discussions on human rights.

The EIF, as a global partnership of 51 countries, 24 donors, and eight partner agencies supporting trade development in the least developed countries (LDC), has not as such been guided by HRBA, and no explicit reference to human rights could be found in the reviewed documents. However, the intervention pays specific attention to the empowerment of women and youth as marginalised groups in LDCs' trade context, and it has achieved important results in promoting gender equality in trade. Platforms and channels for women's and youth's participation in trade policy development have been created. Also, policy-level efforts in promoting gender equality are likely to have linkages to the HRBA, even though this is not explicitly reflected in the available information. According to MFA's influencing plans and as brought up in interviews, gender equality as a cross-cutting objective of the Finnish Development Policy has also been a priority in Finland's agenda in the EIF.

Finding 2: Besides the organisational level commitment, also context-related factors, the thematic focus, and the extent to which the intervention is directly linked to specific country contexts have affected the level of HRBA implementation in analysed multilateral interventions.

As reflected above, the organisational level commitment alone doesn't define the level of HRBA implementation in multilateral cooperation, but it is naturally also affected, e.g., by context-related factors such as emerging or ongoing conflicts, the thematic focus of the intervention, as well as the extent to which the intervention is directly linked to specific country contexts.

The multi-bi intervention of UNFPA in Myanmar and UN Women in Libya are good examples of interventions where an aggravating **conflict in the local context** has directly affected the level of HRBA implementation. HRBA was strongly reflected in the strategies and plans of both interventions. However, due to the coup d'état in Myanmar and the conflict situation in Libya, the original strategies and plans had to be adjusted. In Myanmar, the UNFPA project could not promote SRHR, GBV and MHPSS-related legislation, policies, and their implementation since the cooperation with the government had to be ceased in 2021. Similarly, the plans of the UN Women project in Libya to strengthen the capacities of government duty-bearers for strengthened inclusion of women in political decision-making and peace process didn't materialise, and the project was not able to systematically address the root causes of women's discrimination, e.g., related to attitudes and behaviours in local governance structures. These challenges and limitations affecting HRBA implementation in conflict contexts are not specifically related to multilateral cooperation as such as reflected in the case study on HRBA in conflict contexts. However, multilateral cooperation plays an increasingly important role in Finland's support to fragile country contexts affected by conflicts (MFA, n.d.).

The analysis of the case study interventions indicates that also the **thematic focus** may affect the level of HRBA implementation in multilateral interventions despite organisational-level commitment to HRBA. Even though the UNDP as a UN Agency is clearly committed to HRBA, and the Aid for Trade project includes HRBA-related elements of strengthening the capacities of rights-holders in participating in economic activities as well as government duty-bearers in developing and implementing inclusive trade policies, the human rights norms and principles have not formed the primary basis for the objective setting and strategies or the risk management of the intervention. This is in line with the findings of this evaluation's case study on HRBA in transition contexts, on HRBA implementation in private sector development-related interventions remaining primarily on the human rights sensitive level with a focus on the management of human rights risks.

On the other hand, the case study on HRBA in Headwinds concludes that partners working on contested issues already have a focus on human rights. As reflected also in the UNFPA project on GBV and SRHR in Myanmar, these partners may combine the HRBA within a service provision role, and the services are normally used for awareness raising, outreach to rights-holders and/or shifts in attitudes and norms by other service providers and the local community.

Furthermore, having targeted support for human rights-related capacity development, like in the case of the HRIE Trust Fund of the World Bank described above, clearly enables human rights progressive and partly even transformative processes within organisations that have not adopted HRBA (see finding 1).

Support to UNICEF's Learning Innovation Hub and Innovative Finance Hub in Helsinki brings up challenges in articulating and assessing the level of HRBA implementation in interventions that are **not directly linked to specific development processes in defined country contexts** but are developing enabling tools or processes for development interventions in different local contexts. At the same time, as shown in this evaluation's case study on HRBA in Innovations, these kinds of initiatives to promote innovations are in themselves often regarded as innovations of importance for the promotion and protection of human rights.

The Learning Innovation Hub aims to find innovative digital solutions to support the realisation of children's right to education. The Innovative Finance Hub aims to increase innovative capital by bringing a variety of stakeholders, including governments, the private sector, civil society, and individual donors, together for development financing for children and promoting mainstreaming of sustainable development and child lens in the regular investment decision-making.

The two innovation hubs are aligned with UNICEF's child rights-focused HRBA. The aim of contributing to the strengthened capacities of duty-bearers in fulfilling their duties related to the right to education by developing and piloting innovative learning tools is clearly at the core of the Learning Innovation Hub's work. In these efforts, the Hub gives emphasis on the principles of participation and inclusion as well as non-discrimination and equality. However, the role of these global-level hubs in strengthening the capacities of rights-holders remains indirect in the case of the Learning Innovation Hub) and invisible in the case of the Innovative Finance Hub. Overall, in the plans and reports of the Innovative Finance Hub, the HRBA elements are still quite vaguely articulated. Taking into consideration that the hubs have been operational only since 2022, it's still too early to assess how the HRBA as an approach will be operationalised not only in the interventions and development processes for which the Innovative Finance Hub aims at mobilising resources but also in the promoted financing architecture and processes themselves.

Finding 3: The very general nature of global level reporting for core or otherwise unearmarked funding, as well as lack of explicit reference to HRBA or its elements, makes it difficult to monitor and assess, and thereby enhance the level and effectiveness of HRBA implementation in the work of multilateral partner organisations even if they are committed to and apply HRBA in their operations.

Challenges related to assessing the level of ambition in HRBA implementation in MFA-funded global-level strategies and plans, as well as to the monitoring of HRBA implementation and related results and other achievements based on available reports, were brought up by several MFA interviewees. The desk review results confirm that these challenges are not only related to the above-described factors affecting the actual level of HRBA implementation and achievement results but largely also to the general nature of global level reporting or, to some extent, even lack of reporting on the implementation of HRBA or its elements. Especially in the case of core funding or similar unearmarked global level support to multilateral partners, but also in the case of thematically more focused global programmes, the strategies, plans, and reports are often of a very general nature and include, overall, rather limited information on concrete results.

As described above, the HRBA, application of human rights norms and principles are reflected in UN Women's global strategic plan and reporting on results. However, a more explicit analysis of HRBA implementation and related strengths and challenges is missing in the analysed documents. Furthermore, based on global-level reporting, it's not possible to assess how coherently and systematically the HRBA and, for example, the principles of non-discrimination and inclusion are applied in different regions and countries, nor the effectiveness of the HRBA implementation.

In the case of the AfDB, ADF, and Green Climate Fund (GCF), only the ADF documents include some information related to human rights principles. This reflects the fact that these organisations have not adopted HRBA as an approach. Information related to the *do no harm* criteria of human rights sensitive level as minimum requirements for all MFA funding can be found in the case of AfDB and ADF only in the documents of the AfDB Group's Integrated Safeguards System (African Development Bank Group, 2023). In the case of the GCF, the commitment to respect human rights is reflected in the policy documents (Green Climate Fund, 2022). However, monitoring data or analysis on the implementation of these policies can't be found in the available reports or other documents of either of these organisations.

The case of the HRIE Trust Fund brings up another factor, namely the short implementation period affecting the monitoring and reporting of HRBA results. The implementation period of the Trust Fund grants is set as two years. This is a short time for achieving measurable, transformative results in human rights, which is reflected in the focus on output indicators (e.g., quantity and quality of training) in the reporting of the Trust Fund. However, reporting on outcome or impact-level results (e.g., changes in the trained persons' conduct in their work) would require follow-up on the project beyond the two-year implementation period. Similar challenges affecting monitoring and reporting on HRBA results are certainly faced in other short-term interventions or interventions focusing on initiating and piloting new tools or approaches.

The above-noted challenges related to reporting on HRBA are much less faced in geographically and thematically more focused regional or country-level multi-bi interventions, as noted by several MFA interviewees and reflected in the reviewed documents. MFA has often participated in the planning of multi-bi interventions, and thereby it has been in a better position to influence the content of project documents and reports. Furthermore, the cooperation is quite often a continuation of MFA's earlier support to the previous phases of a longer-term programme that also has increased MFA's familiarity with these interventions.

2.2   Findings regarding risk management

Finding 4: HRBA in risk management is better reflected in the plans and reports of multi-bi or thematically earmarked interventions compared to the unearmarked global level funding to multilateral partners. However, monitoring and reporting on human rights risks remain largely weak.

The desk review and conducted interviews indicate that, like in the overall planning and reporting, also in the risk management-related plans and reports, HRBA is better reflected in multi-bi and thematically earmarked interventions compared to global-level unearmarked funding to multilateral partners. However, the reviewed reports included, overall, rather limited information on identified human rights risk and their monitoring, including changes in risk levels.

The multi-bi project on GBV and SRHR in Myanmar implemented by UNFPA monitored and reported regularly on changes in the operating context, e.g., related to the COVID-19 pandemic and the conflict situation in the country affecting the HRBA implementation. However, more detailed information on the project risk management, including identified risks, risk levels and mitigation measures, could not be found in the available materials. In the case of the multi-bi *Aid for Trade* project of UNDP in Central Asia, processes for human rights risk management were described in the project plan, but no monitoring information was provided on these processes or on identified risks

and their mitigation. However, in the project board meetings, MFA representatives have pointed out the need to pay attention, e.g., to the human rights norms related to decent work.

The human rights risks are reflected in the risk management plans of the two UNICEF Innovation Hubs. The risk framework of the intervention includes some human rights-related risks, and there are also processes and guidance in place for managing human rights risks-related to the use of artificial intelligence as well as engaging in cooperation with companies. Furthermore, in the interviews, it was brought up that there are plans to develop a framework to guide HRBA in developing digital solutions with an emphasis on the best interest of the child, including safety and age-appropriateness.

Finding 5: The external assessments commissioned by Finland on its UN partners' risk management can contribute to improved management of human rights-related risks.

As a follow-up to a corruption incident in MFA funded the United Nations Office for Project Services (UNOPS) S3i Programme Office in Finland, MFA commissioned in 2022 a comprehensive external assessment on the risk management of the UN agencies it's funding. These assessments conducted by KPMG also looked into the systems for managing risks of possible negative impacts on the human rights of people potentially affected by the activities of these organisations, including policies on sexual exploitation and abuse / sexual harassment, grievance mechanisms, remedy processes, measures for ensuring the protection of grievance channel users from retaliation, as well as related capacity building within the organisation.

Regarding the case study interventions, in UN Women significant lack of adequate management and oversight of ethics issues was assessed as a significant risk, while also weaknesses in the training of staff on identification and reporting of incidents as well as systematic sharing of information within the organisation were identified as risks. In the case of UNICEF, poor resourcing of the Ethics Office compared to the caseload was identified as a significant risk. (KPMG, 2022) The recommendations of these assessments are being followed-up and monitored in MFA's discussions with partners. In the UN Women, this has led to the establishment of an independent ethics function.

Finding 6: Finland has contributed to strengthening human rights risk management systems in funded IFIs. However, continued monitoring and influencing are essential for ensuring that also funding to these and other multilateral partner organisations not explicitly applying HRBA meets the MFA minimum requirements for HRBA.

The *do no harm* perspective has been systematically integrated into the risk management of the Human Rights, HRIE Fund of the World Bank. Identified risks of potential negative impacts on human rights have been, e.g., related to the COVID-19 pandemic, conflict and insecurity, and a weak understanding of HRBA by local stakeholders. Besides its own risk management, the Trust Fund has also supported the strengthening of the World Bank's human rights risk management, e.g., by conducting research and case studies on grievance mechanisms and factors influencing their effectiveness in World Bank-financed projects, supporting the development of human rights-based assessment tools as well as guidance on grievance mechanisms for Sexual Exploitation and Abuse & Sexual Harassment in World Bank-financed projects.

Besides funding to the HRIE Trust Fund, Member States and thereby also Finland's possibilities to influence the management of risks related to potential negative impacts on human rights in World Bank's operations through the Board of Directors have strengthened recently. Since 2021

all management action plans on grievances from the IFC have required a World Bank Board approval. Finland is represented on the Board by the Constituency of Nordic countries.

In the AfDB and the ADF managed by AfDB, the human rights risk perspective is being strengthened in the Integrated Safeguards System as well as the Independent Review Mechanism (IRM), the role of which is to provide people adversely affected by AfDB-financed projects with an independent mechanism through which they can request the AfDB to comply with its own policies and procedures. The Constituency of Nordic countries, Ireland and India, has been among the constituencies promoting these developments with emphasis on gender equality and prevention of gender-based violence.

While the system-level improvements are appreciated by interviewees, it was noted that there are still open questions, e.g., related to AfDB's human rights responsibility regarding supply chains in funded projects. There are also indications of weak functioning of grievance mechanisms and constraints related to their accessibility, the number of grievances being significantly lower compared to the World Bank, for instance. These indications show the central importance of continued human rights risk management-related influencing in board-level work from the perspective of the minimum requirements set for human rights-sensitive level HRBA implementation in MFA-funded development cooperation.

Finding 7: Sensitivities related to human rights don't hinder MFA from raising human rights and HRBA-related concerns in IFIs or other multilateral organisations, but they affect how it is done.

Overall, very few concerns related to risks arising from the use or promotion of HRBA in multilateral cooperation to the achievement of other objectives and goals could be identified in the analysed interventions or were brought up in the conducted interviews.

Cautiousness in raising concerns related to democracy or the rights of LGQBTIs was brought up by some MFA interviewees doing global-level influencing in IFIs and some other multilateral partners. On the one hand, the importance of finding the right channels for raising this kind of more sensitive issue was brought up. For example, raising LGBTQI rights-related concerns through the operational management structures of a multilateral partner organisation rather than in board-level discussions with representatives of countries having LGQBTI hostile legislation and policies were brought up by one interviewee as a strategy to manage risks related to human rights-related influencing. On the other hand, some interviewees underlined that also sensitive issues, e.g., related to SRHR, can be brought up in discussions if attention is paid to the ways the messages are formulated. *"We can speak freely, but it's about how to do it, not provoking. There's no need to be always too explicit."*

In the UN Women's intervention promoting women's political participation in Libya, the risks related to the resistance by local stakeholders to the promoted human rights aims were identified as a risk in the project plan. While this risk is related to the use of HRBA, it also implies a risk of negative human rights impacts potentially affecting especially women participating in project activities. Similar risks in UN Women's and the International Organization for Migration (IOM) interventions in other country contexts in the North-African region and the importance of integrating them in project risk management were also brought up by one interviewee. In the case of the intervention in Libya, mitigation for managing this risk was planned, but related activities were not conducted due to the worsened conflict situation.

2.3 Findings regarding the added value of HRBA-related influencing in Finland's multilateral cooperation

Finding 8: MFA's HRBA-related level of influencing with multilateral partner organisations and related results have strongly focused on the cross-cutting objectives of gender equality and the rights of persons with disabilities.

In line with MFA's regular funding-related decision-making processes, the alignment of the multilateral partners with the HRBA is explicitly analysed and assessed by the MFA Quality Assurance Board before making the final funding decisions. In MFA's organisation-specific influencing plans, target setting and monitoring, the HRBA as an approach or HRBA-related gaps or weaknesses identified in the above-noted analyses in connection to funding-related decision-making are less clearly reflected. The influencing targets in the plans prepared in 2020 and 2021 have been guided by MFA's joint longer-term influencing objectives with a clear emphasis on the cross-cutting objectives. While the influencing plans don't include explicit targets on the promotion of HRBA as a holistic approach in Finland's multilateral partner organisations, the human rights norms and principles are most clearly reflected in the more concrete target setting related to MFA's longer-term influencing objective of promoting gender equality and the rights of persons with disabilities in multilateral partners' work. This emphasis on the cross-cutting objectives as a more focused angle to promote HRBA was brought up in several interviews, while some interviewees brought up concerns about unclarities regarding the linkages between the cross-cutting objectives and the approach.

Furthermore, in some interviews and influencing plans, MFA's role in addressing human rights risks in the promotion of innovations was brought up. Also, MFA's other objectives, especially those related to increasing resources to inclusive, quality education and promotion of responsible business, may have had linkages to HRBA. However, the use of human rights norms and principles in related influencing work was not reflected in MFA's reviewed influencing plans. Furthermore, related influencing targets or activities weren't raised by any interviewee in the discussions on MFA's HRBA-related global-level influencing work, except in relation to the promotion of gender equality and rights of persons with disabilities in business development-related work.

MFA has defined the following more concrete organisational level targets for its objective of promoting gender equality and rights of persons with disabilities in the work of multilateral partner organisations:

1. **Gender equality-related strategies have been developed, and they are of good quality and reflected in gender-sensitive programming, capacities, monitoring and budgeting.**

   This target has been strongly reflected in MFA's influencing plans and activities with most UN partners (7), AfDB and WB, and several other multilateral partners such as GCF and Global Environment Facility (GEF). In cooperation with other countries promoting gender equality, especially the Nordic countries, Finland has played an active role in promoting gender equality issues, e.g., in board-level discussions and contributed to the development of gender equality strategies and plans of these organisations. For example:

   - With UN Women, MFA has played a proactive role in systematically promoting a human rights-based gender transformative approach in the Executive Board and the Commission on the Status of Women. This strongly human rights-based influencing

work has been considered important by the partner organisation, especially in a situation where the anti-gender perspective is increasingly promoted by many member states in these fora. Furthermore, MFA has supported UN Women's role in promoting gender equality more widely within the UN system and during the past years, especially in the area of humanitarian work.

- MFA has contributed to the development of the World Bank's gender strategy with a focus on making it human rights-based. Attention has been drawn to the minimum criteria on *do no harm* and human rights risks from women's perspective. In the African Development Bank, Finland has also participated with other Nordic countries in gender equality-related influencing in the development of the safeguard system and promotion of systematic gender mainstreaming in AfDB's work as a whole, not only in specific components.

- MFA's role in promoting a gender transformative approach in the development of UNICEF's gender action plan and global strategy process has been appreciated by partners.

- MFA has also contributed to strengthened attention to gender equality-related monitoring in OCHA that has started disaggregating data by using a gender with age marker (GAM).

Finland's proactive role in promoting gender equality has been recognised by partner organisations, as reflected in the conducted interviews and the results of the evaluation on Finland's influencing work with multilaterals (Palenberg et al., 2020). However, one interviewee noted that only more recently, the gender equality-related influencing work has been more systematically linked to the human rights norms and, thereby, to the HRBA as an overarching approach.

2. **The rights of persons with disabilities have been taken into consideration in partner organisations' programming, capacities, monitoring and budgeting.**

Also, this explicitly human rights-based influencing target has been strongly reflected in MFA's influencing plans and activities with the UN Agencies (8), World Bank and the International Fund for Agricultural Development (IFAD), and some other multilateral partners, including the International Committee on Red Cross (ICRC) and the Development Assistance Committee (DAC). In line with the findings of the disability case study of this evaluation, the reviewed documents and conducted interviews Finland's specific added value in promoting disability inclusion in the work of multilateral organisations was clearly highlighted, this topic being actively promoted by much fewer countries compared to the gender equality related influencing. In addition to the influencing work done, especially by the embassy staff, Finland has also supported the United Nations Partnership on the Rights of Persons with Disabilities (UNPRPD) in raising awareness of disability rights within the UN and mobilising modest resources for developing programming that reflects commitments to disability rights (see the case study From cross-cutting objectives to HRBA, lessons from disability programming).

MFA's disability inclusion-related results in influencing work with multilateral partners include, for example:

- United Nations High Commissioner for Refugees (UNHCR) systematically brings up the disability inclusion perspective in all important meetings and presentations, and in this connection, it has given credit to Finland's role in promoting disability inclusion. UNHCR currently has a core budget-funded position on disability inclusion.

- WFP has a disability inclusion roadmap approved by its executive board in November 2020. The roadmap is the organisation's first comprehensive policy document aiming at mainstreaming disability inclusion in its work.

- Partly as a result of MFA's influencing work, the disability inclusion strategy *ICRC Vision 2020 on Disability* was approved by the executive board of ICRC.

- MFA has worked on disability inclusion also with UNFPA, and its proactive role in systematically promoting the rights of persons with disabilities is appreciated by partners. The collaboration has also included organising specific activities on the rights of persons with disabilities with a specific focus on SRHR, such as a photo exhibition and seminar in Finland.

Still, there are multilateral partner organisations with much less progress in promoting disability inclusion and allocation of organisation's core resources for related work. In some cases, Finland has decided to postpone addressing this topic in its influencing with the organisation (e.g., ADF and GCF) due to the unlikelihood of achieving results or the need for further analysing and concretising the related key messages. In World Bank, MFA funded a specialist on the rights of persons with disabilities for two years. The expectation was that the position would be continued with WB's own resources, but this didn't take place.

3. **The organisations have functioning Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) policies and guidelines, and they are efficiently implemented.**

This target has been explicitly reflected only in the influencing plan of UNDP, where Finland has underlined the importance of zero tolerance on any SEA/SH issues or other inappropriate behaviour, prevention of harassment and abuse, as well as appropriate and timely measures for addressing reported cases. However, as brought up by some interviewees, these aspects have also been reflected in MFA's and its constituency partner countries' gender equality-related influencing, e.g., in AfDB. Furthermore, the assessment on the SEA/SH policies and their implementation in Finland's main UN partner organisations was included in the external assessments on the risk management of the UN agencies commissioned by MFA in 2022 (see finding 5).

4. **The relevant organisations promote the realisation of sexual and reproductive health and rights in their policies and operations.**

The SRHR-related influencing work has focused especially on MFA's collaboration with UNFPA and UNICEF. In UNICEF, Finland has aimed at mainstreaming SRHR into UNICEF's all work, e.g., through global strategy-related influencing work. These efforts were appreciated by the partner. However, the SRHR as a topic is not explicitly reflected in the approved strategy (UNICEF, 2022).

Taking into consideration the mandate of UNFPA as the UN Agency focusing on SRHR, this topic has been at the centre of MFA's dialogue and influence with UNFPA. MFA's role in promoting comprehensive, human rights-based SRHR education despite strong resistance by many countries has been appreciated by the partner.

Finland's efforts on HRBA in the **promotion of innovations** was brought up in connection to Finland's cooperation with some UN Agencies. Perhaps most visibly, this aspect has been reflected in MFA's cooperation with UNICEF. A global-level process on the use of artificial intelligence (AI)

systems in protecting, supporting, and empowering children has involved a wide range of experts, policymakers, practitioners, children, and youth. One of the main results has been an updated and piloted version of the Policy Guidance on AI for Children (UNICEF & MFA, 2021) promoting children's rights in government and private sector AI policies and practices and raising awareness on the potential of AI systems in upholding or undermining these rights. As noted above, these perspectives are also reflected in MFA's current support of UNICEF Innovation Hubs based in Helsinki.

MFA has also supported UNFPA in boosting its work in relation to women's and girls' online exposure to violence. In East Africa, MFA has supported UN Women in the use of technological innovations in promoting access to SRHR-related services. Furthermore, the case study on HRBA in innovations brings up MFA's support for OHCHR's Gender Accreditation System, has increased the activities focused on gender equality, allocated a higher budget for such activities, and improved the gender analysis in annual planning processes, monitoring and reporting, and communication.

Finding 9: HRBA as an approach has been better reflected in dialogue related to multi-bi cooperation or some thematically more HRBA-focused interventions compared to global organisation-level influencing.

As reflected above, MFA's HRBA-related influencing with multilateral partners has strongly focused on the CCOs of gender equality and disability inclusion. These CCOs focusing on specific human rights principles and rights-holder groups can be considered to form a continuum with HRBA. However, the HRBA as a holistic approach or gaps identified in MFA's HRBA analyses conducted in connection to funding-related decision-making processes have not that much been explicitly reflected in organisation-specific influencing plans or activities.

In most cases, MFA's consciously chosen focus on the CCOs has narrowed down the way HRBA has been addressed in Finland's organisation-level influencing with multilateral partners, including influencing related to the *do no harm* minimum requirements for MFA funding. However, in the case of some organisations, e.g., UN Women and UNFPA, the emphasis on gender equality and related organisational-level targets has enabled rather comprehensive promotion of HRBA taking into consideration the mandates of the agencies strongly focusing on these issues.

The HRBA has been more comprehensively addressed in MFA's cooperation and dialogue with multilateral partners in relation to multi-bi interventions in specific geographical contexts. The analysis of the multi-bi projects of UNFPA in Myanmar and UNDP in Central Asia shows that MFA has played a proactive role in promoting strengthened integration of HRBA into these interventions. On the other hand, some interviews indicate that the CCOs on gender equality and non-discrimination with emphasis on disability inclusion have been clearly guiding MFA's dialogue with multilateral partners also in relation to multi-bi interventions or thematic multilateral interventions. For example, in the EIF promoting inclusive trade in LDCs, MFA has primarily promoted strengthened attention on gender equality issues and, to some extent, also disability inclusion, and not yet, e.g., on issues of business and human rights. Similarly, in multi-bi interventions in Northern Africa, attention has been paid to the inclusion of persons with disabilities, migrants, refugees, and other marginalised groups.

In the UNFPA project on SRHR and GBV in Myanmar, MFA emphasised the importance of ensuring that the intervention would not have a too strong focus on service provision and that it promotes policy-level changes with the government. MFA supported the policy-level efforts through its bilateral dialogue with the government (before the coup d'état). Furthermore, MFA promoted with Sweden that also funded the project, strengthening human rights awareness raising and education-related

elements as well as more comprehensive approaches for prevention of violence in communities aiming at a cultural change. MFA also played a proactive role in gradually integrating the disability inclusion perspective into the intervention, including into the work of CSOs implementing community-level project activities and providing services.

In the planning of the latest phase of the UNDP Aid for Trade intervention in Central Asia, MFA had a strong focus on ensuring women's empowerment and gender equality in the project efforts on promotion of entrepreneurship. In this connection, e.g., disaggregation of data in project monitoring was strengthened. Furthermore, MFA has also drawn attention to the human rights norms related to decent work in efforts for and monitoring of creation of new jobs.

The long-term support to the Human Rights, Inclusion and Empowerment Trust Fund (formerly Nordic Trust Fund) in the World Bank is a good example of a channel for supporting HRBA promotion and related dialogue in a multilateral organisation with remarkable institutional obstacles hindering the adoption and systematic application of the approach in its operations (see finding 1 on page 6 of this report). Besides funding, MFA has actively participated, e.g., in the discussions of the Partnership Council of the Trust Fund on the promotion of HRBA within the World Bank, and it has advocated, together with some other Nordic countries, explicit use of HRBA and human rights norms including economic, social, and cultural rights in the Trust Fund's objectives and work within the World Bank.

As noted by one interviewee, the fact that human rights are now explicitly reflected in the name of the Trust Fund, formerly Nordic Trust Fund, reflects the achievements of the Trust Fund in strengthening awareness of and acceptance of human rights within the WB. The added value of this kind of support to more focused interventions (Trust Funds, global or thematic programmes) as a channel for promoting wider changes in the adoption and application of HRBA in multilateral organisations was recommended by several interviewees, both from MFA and partner organisations.

Finding 10: MFA's main strengths in HRBA-related influencing in multilateral organisations are related to commitment and expertise, collaborative and constructive approach, as well as close cooperation with other like-minded countries. Higher levels of funding increase MFA's influence in these organisations.

Strong commitment and expertise, especially on gender equality and disability inclusion, were recognised by interviewees from both MFA and partner organisations as clear strengths in MFA's policy influencing. This was in line with the findings of the Evaluation on Finnish Development Influencing Activities in Multilateral Organisations (Palenberg et al., 2020). Even though challenges related to MFA staff's HRBA-related capacities were brought up in the conducted interviews, several MFA interviewees noted that MFA staff generally have an **overall understanding of HRBA** and preparedness to raise related key messages in different connections and contexts.

Coherence in the messages of MFA representatives up to the minister level in raising gender equality and disability-inclusion-related human rights concerns was appreciated by several interviewees from partner organisations. Furthermore, the **collaborative, constructive and pragmatic approach** of MFA in promoting HRBA and in MFA's influencing work more widely was appreciated both by many interviewees from partner organisations and MFA staff. However, also need for stronger position-taking by higher-level MFA representatives in annual meetings and board-level discussions to support HRBA and effective human rights risk management in more challenging organisational contexts was brought up by some interviewees.

"Our pragmatic approach is Finland's strength. It's important to maintain dialogue and aim at changes through influencing. We have perhaps been more careful of not taking very strict positions compared to some other countries." (KII, MFA)

"They have been constructive to work with in a way that could create change. They are always looking to find solutions, which is very appreciated. Then there's the flag-bearing aspect: what Finland stands for is also very clear." (KII, partner)

Close cooperation with other like-minded countries, especially the Nordic countries, is considered a clear strength and factor increasing the effectiveness of MFA's HRBA-related influencing work. This applies especially to cooperation with IFIs where Finland belongs to the same Constituencies as other Nordic Countries and collaborates very closely with them in the formulation of joint position statements and other influencing work. Close cooperation with other Nordic countries was brought up also in relation to other multilateral partner organisations, including UN Agencies like UN Women and UNFPA.

Furthermore, MFA's multi-stakeholder approach to involve different kinds of actors, including parliamentarians and CSOs, in its multilateral dialogue was considered by one interviewee from a partner organisation as something specific to Finland that could be useful also for other countries to follow.

The issue of **big donors having a stronger voice** was very clearly reflected in connection to MFA's influencing work in UN Women and UNFPA, where Finland is among the biggest donor countries. This issue was brought up in MFA's influencing plans, as well as in the interviews of both MFA staff and representatives of partner organisations. Accordingly, cooperation with other like-minded countries was considered specifically important in organisations, e.g., IFIs, where Finland's size in terms of funding levels remains small.

Finding 11: MFA's main weaknesses in HRBA-related influencing in multilateral organisations are related to human resource-related constraints, challenges related to linking more focused multilateral interventions to organisational-level influencing, as well as weaknesses in monitoring and institutional memory.

Even though the overall understanding of HRBA and expertise, especially on CCOs, were identified as MFA's strengths in HRBA-related influencing in general, the limited capacities of diplomatic staff and new MFA staff, who are not specialised in development issues, to conduct **more profound analysis and influencing on HRBA and CCOs** was brought up as a challenge by some interviewees from MFA. This was linked to limited HRBA expert resources within the Ministry, only a few advisors needing to support different funding instruments and cooperation with a wide range of partners.

Overall, challenges related to **scarce human resources within MFA** for managing very wide and numerous multilateral partnerships together with rapid staff rotation were repeatedly brought up, especially by interviewees from MFA but also from partner organisations, as challenges affecting MFA's capacities to conduct more systematic HRBA-related analysis, influencing and monitoring. While this generally recognised challenge also affects many other areas of MFA's work and has been brought up in various other evaluations, some interviewees pointed out that it affects HRBA-related influencing significantly since MFA staff don't have time and space for conducting related analysis, including analysis on human rights risks in multilateral partner organisations. In relation to multi-bi interventions, MFA is in a much better position to promote HRBA throughout the programme cycle in countries where Finland has Embassies with staff responsible for development

cooperation, while interventions fully managed by MFA staff based in Helsinki are more weakly resourced.

Even though the influencing plans as a tool guiding the influencing work in multilateral organisations was appreciated by several interviewees, some interviewees brought up the issue of these plans being **activity focused with weak linkages** to other work relevant to the concerned multilateral partnership managed by other MFA units. The need for strengthening linkages between, e.g., multi-bi interventions and organisational level influencing has already been identified earlier (Palenberg et al., 2020), but as noted above, there's a need for further strengthening this kind of linkages also in relation to HRBA-related influencing. Furthermore, gaps in sharing and systematic archiving of HRBA-related analyses and other information, as well as reporting from influencing activities of individual MFA staff, were identified as a challenge contributing to **weak organisation-level monitoring and institutional memory within MFA**, even though such practices would be essential in an organisation with high staff rotation.

The importance of **management-level ownership** in MFA on multilateral cooperation and HRBA was brought up in interviews with some MFA staff. While the management-level ownership of HRBA was appreciated by several interviewees, some interviewees raised concerns about weakening interest in these issues affecting the resourcing of HRBA implementation in Finland's multilateral cooperation, including MFA's HRBA-related influencing in multilateral organisations. Some interviewees brought up concerns about bigger priority being given to competing policies, e.g., related to triple nexus, private sector cooperation and public sector investments.

3   Conclusions

The conducted analyses show that **the level of HRBA implementation in MFA-funded multilateral development cooperation varies greatly**. Since partner organisation's commitment to and adoption of HRBA as an approach is naturally one of the main factors affecting the level of HRBA implementation, it is evident that an important share of MFA-funded multilateral development cooperation continues being only on the human rights sensitive level as defined in the MFA Guidance Note on HRBA (MFA, 2015). **The strong policy-level commitment to HRBA within the UN system** forms a good, although not automatic basis, for MFA to have HRBA progressive or even HRBA transformative cooperation with UN Agencies. (See findings 1, 2)

However, an important share of Finland's funding to multilateral organisations is channelled to IFIs and other organisations that have not adopted HRBA as an approach, e.g., due to the prohibition of political activities or other sensitivities related to the interference in member states' internal affairs. The example of MFA's HRBA-related influencing in the World Bank through **the HRIE Trust Fund demonstrates the possibilities to strengthen the human rights perspective in this kind of more challenging organisational context**. It is, however, evident that related policy-level change processes are very slow and affected by numerous external factors. (See findings 1,2)

MFA's global-level HRBA-related **influencing in multilateral partner organisations has focused on cross-cutting objectives with an emphasis on gender equality and the rights of persons with disabilities**. This focused approach and target setting has supported MFA in achieving and reporting good results, e.g., in strengthening multilateral partner organisations' gender equality and disability inclusion-related policies, guidelines and practices. Furthermore, in the case of Finland's biggest UN partner organisations, especially UNFPA and UN Women, this focus has allowed quite comprehensive promotion of HRBA since the mandates of these organisations are largely related to MFA's influencing objectives. (See finding 8)

However, **this narrower focus on gender equality and the rights of persons with disabilities in influencing work has not always drawn attention to some potential gaps related to the MFA's minimum requirements for HRBA** implementation, including *do no harm* and attention to human rights principles (MFA, 2015) (See findings 6,8). While influencing the management of risks related to gender equality and rights of persons with disabilities in risk management-related policies is essential, alignment of the influencing work, especially in multilateral partner organisations that have not adopted HRBA with MFA's minimum requirements, would necessitate more holistic attention to the human rights risk management including the functioning and accessibility of grievance mechanisms (MFA, 2015).

It is clear that, e.g., due to resource constraints, MFA's possibilities to do very comprehensive influencing work on human rights risk management in its numerous partner organisations are limited. Furthermore, the emphasis on the cross-cutting objectives is well justified also due to MFA's related expertise recognised by partner organisations. (See findings 10,11) However, defining HRBA minimum criteria-related influencing targets based on the gaps and needs identified in the intervention or organisational context could, in some cases, bring other angles of HRBA to the focus of human rights risk management-related influencing. For example, in the case of trade and business

development-focused interventions, besides influencing gender equality and disability inclusion, it would be highly relevant to integrate the wider perspective of UNGPs into the influencing work.

The analysis shows that **MFA's possibilities to monitor and promote HRBA implementation more comprehensively as an approach is stronger in multi-bi interventions** implemented in specific country or regional contexts **and other thematically more focused multilateral interventions or support to trust funds** compared to global level core funding to multilateral organisations. The potential of this kind of intervention in contributing to organisation-level influencing on HRBA has been recognised within MFA and by partners. (See finding 9) On the one hand, MFA's support of these interventions can enable further development of concrete tools, processes, and good practices for the operationalisation of the approach in a way that takes into consideration the institutional challenges of the concerned organisation. On the other hand, this kind of partnership opens channels for MFA to influence the organisations more widely and can provide solid evidence and, thereby, credibility to MFA's HRBA-related influencing work also in other fora, including executive board-level discussions.

Improving systematic use of the potential of this kind of more targeted support to HRBA implementation would be essential for further strengthening MFA's global-level HRBA-related influencing in multilateral organisations. This should be taken into consideration already in the strategic identification and planning of multi-bi interventions and support to other thematic multilateral interventions or trust funds so that the plans of these interventions would contribute to strengthening HRBA on the organisational level or support MFA's related influencing efforts. It would also require continued attention to related coordination within MFA across unit and department boundaries, as well as systematic sharing and documentation of conducted analyses, good practices and lessons learnt, and other information related to influencing work. (See findings 9, 10, 11)

4   Lessons learnt

The human resource constraints will affect MFA's HRBA-related influencing in multilateral organisations also in the coming years. However, MFA's past influencing work and related results, e.g., in main UN partner organisations, especially UN Women, UNFPA and UNICEF, as well as in World Bank, through the HRIE Trust Fund, form a good basis for further strengthening these efforts.

Taking into consideration the human resource-related constraints within MFA, it is clear that MFA will not be able to conduct systematic and comprehensive organisation-level HRBA influencing with linkages to more focused multilateral human rights-based interventions in all of its numerous multilateral partner organisations. Therefore, it would be good to consider selecting some prioritised partner organisations and interventions for piloting and developing feasible and effective coordination, information sharing, and documentation practices and thereby also improved self-monitoring of HRBA-related influencing work. In the selection of these prioritised organisations, also complementarities and synergies with other like-minded donors as well as possibilities to share lead roles, should be taken into consideration. While the new ways of working may be later on expanded more widely to MFA's HRBA-related influencing work also with other multilateral organisations, the intensity of this work will certainly also vary in the future depending on the partner organisation.

Taking into consideration the weaknesses in multilateral partner organisations' global-level reporting on HRBA implementation, MFA's dialogue with multilateral partner organisations both at the organisational level and on the level of interventions is an essential means for monitoring HRBA implementation in MFA-funded multilateral development cooperation. However, MFA should continue raising the issue of transparent reporting on HRBA implementation and related results in its discussions with multilateral partner organisations, especially those for whom Finland is among the biggest donors.

The external assessments of UN agencies, commissioned by MFA in 2022, have provided valuable information on the strengths and weaknesses in the risk management systems of these organisations. From the perspective of HRBA, these assessments showed the importance of not only looking into whether and how the *do no harm* perspective has been integrated into organisations' policies but the necessity of monitoring the operationalisation of these policies, e.g. through awareness raising and training, for staff and other key stakeholders, ensuring the functioning and accessibility of grievance mechanisms, as well as having functioning processes for addressing and as necessary remediating the reported cases. Learning from these assessments could, in this way, be used also in the *do no harm* related monitoring and dialogue with other multilateral partner organisations.

CASE STUDY:
HRBA IN SEVERE HEADWINDS

1 Introduction

This case study comprises one of seven prepared for the MFA Finland's Evaluation of HRBA in Finland's Development Policy and Cooperation. The other case studies are (1) HRBA in the context of long-term partnerships, (2) HRBA in transition contexts, (3) HRBA in conflict contexts, (4) Innovations and trends towards transformational programming, (5) HRBA in partnering with multilaterals, and, (6) From cross-cutting objectives to HRBA, lessons from disability programming.

The purpose of each Case Study is to apply the overarching evaluation questions, design and methodology of the strategic level evaluation while adapting their analysis for the specifics of the thematic context. The specific objectives of each case study are:

- To provide a contributory evidence stream to the overall strategic evaluation;

- To help interrogate the wider theoretical framework for the evaluation (see Inception Report) by generating evidence to inform it, and

- To generate Lessons/Implications to help inform MFA stakeholders in their HRBA as part of the constructive approach adopted by the utilisation-focused model of the overall evaluation.

Box 4. Examples of contested issues

Examples of contested issues[13]

- bodily integrity

- sexuality education

- family planning

- sexual orientation

- gender identities

- community/indigenous peoples' rights to natural resources

- artistic freedom

Rights of

- LGBTQI persons

- stigmatised ethnic minorities, clans or casts

- indigenous people

- migrant workers

- Paperless migrants

Source: Evaluation Team

---

13 Generic examples not only based on the case study sample.

No Case Study is explicitly a full evaluation of Finland's HRBA in its context, which would be beyond its remit. Accordingly, it does not provide recommendations but rather proposes some lessons/implications to support internal dialogue and learning. This case study looks at how HRBA is integrated into designs and applied in practice focusing on contested human rights and how the support to interventions and actors in authoritarian settings is managed to enable HRBA as part of the partnership.

HRBA in headwinds refers both to the application of the approach in contexts with increased authoritarianism and shrinking civic space and/or dominated by social and cultural norms contradicting specific human rights or rights of discriminated groups. The legal context also has implications on how headwind issues can be promoted.

1. No recognition of the right/s by the state.

2. Recognition of the right/s by the state through a commitment to human rights frameworks but rights not domesticated.

3. Rights are formally protected by the constitution or national legislation, but not socially/ culturally accepted by the public or by groups mobilising against agreed human rights, and therefore not fulfilled or protected by the authorities.

4. Conflicting dual legal systems, where local jurisdiction or practices are inconsistent with statutory legislation.

The case study demonstrates some common contextual and thematic features:

- The examples are implemented in traditional and patriarchal societies, where norms and values are based on religious beliefs, which also might be reflected in national legislation.

- Societies with high levels of conflict or in conflict.

- Strong position of anti-rights advocates, including those in power.

- Misconceptions/lack of awareness of the rights in focus among public/private service providers.

- Rights referring to bodily autonomy and sexuality, particularly for children and adolescents.

- Rights referring to family law.

Out of the six interventions in the case study, four operate in humanitarian and conflict contexts (Afghanistan, Ethiopia, Somalia, multi-regional/country[14]), with either a nexus approach or strong service delivery components (**Table 10**). During the studied period, the civic space and the possibility to address SRHR improved slightly in Ethiopia[15] and Somalia through the political will to

---

14 Europe and the Middle East and North Africa (MENA), South and South East Asia, and Sub-Saharan Africa: India, Pakistan, Bangladesh, Sri Lanka, Thailand, Myanmar, Indonesia, and wider South and Southeast Asia, Balkans, Central African Republic, Kenya, Mozambique, Somalia, Sahel and Sudan.

15 CSO allowed to organise around rights in Ethiopia through the revised Civil Society Proclamation (2019).

commit to civic rights and SRHR, while the space to defend human rights for women in Afghanistan[16] decreased and for LGBTQI persons in Kenya[17].

Box 5. HRBA in Kenyan context

> **Kenyan context**
>
> The challenge with HRBA is not related to the formal duty-bearers, but to the public opinion. It is possible to work rights-based and to have an explicit rights language. However, recent developments indicate more repression and mobilisation of anti-gender/anti-rights movements, which has caused LGBTQI organisations to take precautionary measures and decrease some of their visibility and shifting content at their web pages.
>
> *Source: Evaluation Team, based on desk review and interviews*

The sample includes interventions implemented in conflict settings which means that there is a certain overlap with the Conflict case study. Though this case study does not focus on the limitations conflicts pose to the application of HRBA in Headwinds, it is still relevant to take note of conflict contextual factors highlighted in the Conflict case study:

"Countries in conflict represent unique challenges for applying HRBA in several respects. Ambitions may be severely constrained in environments where duty-bearers frequently lack legitimacy or fail to accept their responsibilities. Other actors, including humanitarian agencies and the UN, may be forced to engage beyond their intended roles. Peacebuilding efforts encompass mediating roles between rights-holders and duty-bearers that may or may not reflect HRBA norms if there are diverging aims between efforts to reduce conflict tensions and to demand duty-bearer accountability."[18]

The above has a bearing on particularly two of the interventions included in the case study, namely UNFPA Somalia women's and girls' well-being Country Programme and the multi-regional and multi-country Network for Religious and Traditional Peacemakers.

---

16   The period of the intervention in Afghanistan is prior to the Taliban takeover in August 2021, but the shift is still relevant for the projects final report.

17   Increased hostilities against LGBTQI persons in early 2023 and tensions due to the development in Uganda depriving LGBTQI persons their right to identify as LGBT persons.

18   Conflict case study

Table 10. Sample of the case study - headwinds

COOPERATION INSTRUMENT	INTERVENTION NAME	COUNTRY	IMPLEMENTED BY
Bilateral	Integrated Reproductive and Maternal Health Programme Phase VII (2018-2020)	Afghanistan	Marie Stopes International Reproductive Choices Afghanistan (MSIA)[19]
Multilateral (multi-bi)	UNFPA Somalia women's and girls' well-being Country Programme, Somalia[20]	Somalia	UNFPA
CSO	Beyond Inclusion: A human rights-based approach to access services	Kenya	KIOS Foundation (KIOS)/ partner 1
CSO	Enhancing Access to Justice for Sexual & Gender Minorities in Kenya	Kenya	KIOS/partner 2
CSO	Yene Raey 2 - My Body My Future January 2022–December 2025	Ethiopia	Plan International Finland/ Ethiopia
CSO	The Network for Religious and Traditional Peacemakers Core Support, Global Program 2021-2024 and Annual Plan 2021	Global	FCA/The Network for Religious and Traditional Peacemakers (NRTP)

Source: Evaluation Team

Interventions reviewed include civil society, bilateral, and multilateral-bilateral instruments. The human rights addressed in the sample are rights for LGBTQI persons (Kenya), access to SRHR (Ethiopia, Somalia, and Afghanistan), sexual and gender-based violence (SGBV), ban on female genital mutilation/cutting (FGM/C), ending Child and Early Forced Marriages (CEFM) (Ethiopia and Somalia), and inclusive participation of religious and traditional leaders in peace processes (several countries).

Five implementing partners are CSOs, two of them Kenyan partners to KIOS Foundation, two national members of international CSOs (MSI Reproductive Choices and Plan International Finland), and the fifth a global CSO network hosted by the FCA. While the partners to FCA, KIOS Foundation, and Plan International Finland, implement their work through the civil society instrument, MSIA is part of Finland's bilateral cooperation with Afghanistan. The multilateral partner UNFPA is supported by the Somalia country programme.

---

19   The agreement was with MSI as an international CSO, managed by the embassy in Kabul. Current support is managed from Helsinki since 2021.

20   Also included funding to a 1-year project (July 2022/June 2023): Ensure access to integrated life-saving gender-based violence and reproductive health services for drought-affected women and girls in high priority districts.

2 Findings

2.1 General issues of direct salience to the case study focus

Finding 1: Headwind issues are easier to promote when combining advocacy with services and awareness raising of rights-holders.

One general issue is how the interventions use a combination of services and awareness raising and mobilisation of rights-holders to claim and make use of their rights. This is not unique to the headwind case; it was also noted in the case studies on conflict and long-term cooperation. As anticipated in the inception report, access to basic health and legal services has been used as an entry point for awareness raising, targeting both direct rights-holder, community members and duty-bearers at the local level. This is the case of five of the reviewed interventions. What might be specific to HRBA in headwinds is how the services are seen by the implementing partners as the main or only entry point to engage with duty-bearers. Some examples are:

- The two LGBTQI interventions in Kenya provide paralegal services, both as a means to strengthen access to justice for LGBTQI persons, to raise awareness among the same, and as a platform for dialogue with the judiciary (project documents).

- UNFPA (KII, partner and annual reports) and Plan Ethiopia (KII, partner) (Plan International Finland, 2021) provide capacity building of health service providers to strengthen rights-based access to SRHR by young rights-holders parallel to empowerment training for young girls enabling them to claim demands for youth-friendly and inclusive services.

As in other case studies, the headwind case study shows a strong focus on the capacity of rights-holders, their awareness of and access to services, and their role in making other citizens aware of their rights. Consequently, the reviewed reports show several results at that level. The capacities of duty-bearers receive less attention, but there are some exceptions, as discussed below.

Finding 2: Advocating for headwind issues requires a constructive dialogue approach and a deep understanding of the role of different duty-bearers.

Advocacy work is generally framed through dialogue and by seeking allies within governmental institutions at different levels or among moral duty-bearers. The implementing actors demonstrate that they understand that their agendas are controversial, independent of whether the rights are legally recognised or not. Their work is based on in-depth knowledge of the context and the human rights situation for the rights-holders they aim to support, which allows for promoting human rights for all despite legal barriers or negative public opinion. To be able to work on contested issues, they seek support from both moral and formal duty-bearers. The possibility to operate is restricted and often requires close coordination with the authorities, sometimes even direct supervision.

- The training modules for Plan Ethiopia's SRHR project must first be validated by key Ministries (Education and Health). Once these measures are taken, the partner can proceed with the implementation (KII, partner). The mandatory collaboration allows Plan Ethiopia and its partners to explore the limits of headwind issues from the point of view of the duty-bearers at the same time as a dialogue on these issues is upheld.

- UNFPA coordinates with the federal government on policy issues at the same time as they see the need to engage with local duty-bearers with a slightly different discourse (KII, partner) (UN Somalia Joint Fund, 2022). This multi-layer dialogue allows UNFPA to better navigate between the more progressive discourse by national duty-bearers and how to promote formally agreed but still contested rights in local contexts.

- MSIA has maintained a close dialogue with both the Ministry of Health and religious leaders throughout the years. The relationship with religious leaders has become increasingly crucial after the Taliban takeover. The direct dialogue and coordination with the ministry is more limited. It is only with their approval that the family planning services can now be provided. Several of the community outreach strategies are no longer possible to implement, e.g., information to young students in schools (Kluyskens & Holmberg, 2023).

Finding 3: Involving religious and traditional leaders when challenging norms and values in conflict with specific human rights creates conditions for HRBA.

Human rights are value-based and contested human rights many times concern what is socially and culturally perceived as personal and issues of the private sphere and matters of religious beliefs and cultural values. All implementing partners engage directly with religious and traditional leaders as key gatekeepers and as potential brokers in forwarding human rights messages to their peers and communities. It builds trust and relationships that allow for continuous dialogue on contested issues. The implementing partners in the reviewed sample are aware of the limitations of promoting headwind issues through religious and traditional leaders. The messages might be diluted and put outside of the power and rights-based analysis, but despite this likely risk, they see the involvement of moral duty-bearers as strategic. This has proven to be an effective way forward for continuous work on the specific rights, including buy-in from elected duty-bearers.

- The UNFPA country programme in Somalia has engaged in dialogue with religious leaders on a partial ban on FGM/C. Religious scholars from other contexts have been invited to discuss FGM and the Quran (KII, partner) (UN Somalia Joint Fund, 2022). This has opened up for reflection on interpretations of the holy scripture and what is traditional practice. There is now an agreement on the partial ban, which also allows for continued dialogue on the rights of women and girls framed in the highly traditional and religious setting.

- MSIA in Afghanistan ensures access to SRH services in a challenging context. Barriers to access are understood from a thorough power analysis, and religious leaders are, as already noted, key actors to enable women's access to the services. Family planning has, since the start of the programme, been discussed from a religious and health perspective with religious leaders to enable community outreach (projrct documentation). The intervention includes training for religious leaders and community health workers on how to promote the use of SRH(R) services and counteract the stigma of persons with disabilities and their access to SRH services. Human rights have been framed in Afghan religious scholars' interpretations of Islam (projrvy documentation) (Kluyskens

& Holmberg, 2023). This comes with limitations and does not allow MSIA to promote its comprehensive SRHR but it is a realistic approach and assessed by MSIA as the only way forward in the current context.

- The interventions in the sample supported by the CSO instrument also target religious and traditional leaders. Some interventions target local duty-bearers within the judiciary and health system, as well as religious leaders (not financed by Finland) to build relationships and increase awareness, create conditions for behaviour changes and increase respect for the rights of LGBTQI persons (KII, partner and project document). Religious leaders are approached individually to raise their awareness of how LGBTQI persons are discriminated against, encouraging them to inform their peers. Dialogue with religious and traditional leaders and local community structures is one of **Plan Ethiopia's** strategies to address the root causes of age and gender discrimination related to SRHR, SGBV, FGM and CEFM (KII, partner) (Plan International Finland, 2021). The programme of **The Network for Religious and Traditional Peacemakers** is all about the involvement of moral duty-bearers as promotors of peace as well as building their awareness on how to be more inclusive both in their own spaces and in those they are invited to. (KII, partner and project documentation)

Finding 4: Finland's promotion of inclusion of persons with disabilities and women's rights is evident in headwind issues. For other marginalised groups, the inclusion efforts are less evident. There is generally weak analysis of intersecting power relations.

Regardless of the modality, one effect of being a partner to Finland's MFA is the fact that the implementing partners pay special attention to persons with disabilities (**Table 11**). The inclusion of persons with disabilities is mentioned in all project plans and generally reported on in most reviewed reports and specifically addressed in the MSIA programme (programme documentation). To include persons with disabilities is in itself not a controversial issue. It indicates that they equally have the right to family planning or that LGBTQI persons with disabilities should not be left behind.

All examples in the sample also aim to promote gender equality and the inclusion of marginalised women. How women rights-holders will be/have been reached is addressed both in plans and reports. This is consistent with both the HRBA and Finland's cross-cutting objectives, but while the promotion of gender equality is a common criterion among many other donors, disability rights are not. As will be discussed in the conclusions, the case study findings attribute the focus on persons with disabilities in the supported projects to MFA's requirements and the partner dialogue.

It is, however, not possible to say if the focus on persons with disabilities and women and girls is strictly a result of the application of HRBA, or of the MFA's demands on CCO, or both. In theory, the CCOs would strengthen the rights-based principles of non-discrimination and active and meaningful participation and vice versa, but it is not clear from the sample how partners interpret the relation between HRBA and the CCOs.

The interventions also aim for the inclusion of marginalised groups such as rural rights-holders, refugees and/or internally displaced persons (IDP). Focus on ethnic/clan minorities is less evident, and consequently, there is limited attention to exclusion due to ethnic discrimination or tribalism. Only two interventions focus on girls, which can partly be explained by contextual limitations. SRH services and information at clinics can only be provided to married girls in Afghanistan, and LGBTQI organisation focus on adult rights-holders due to legal barriers or strategic reasons.

While the promotion of reproductive rights, access to comprehensive sexuality education (CSE) or banning FGM/C illustrate the boldness of the partners working on SRHR, they also have in common that they do not explicitly defend the rights of LGBTQI persons, referring to it as impossible due to the criminalisation of same-sex sexual relations.[21] It also appears that they do not seek to support LGBTQI groups or individuals.

Table 11. Explicit inclusion of marginalised rights-holders

COOP. INSTRU-MENT	INTERVEN-TION	RURAL RIGHTS-HOLDERS	MARGIN-ALIZED WOMEN	GIRLS	PERSONS WITH DIS-ABILITIES	LGBTQI	REFUGEES AND/OR IDP	ETHNIC/ CLAN MI-NORITIES
Bilateral	MSIA Afghanistan	Yes	Yes	No[22]	Yes	No	Yes	No
Multi-bi	UNFPA Somalia	Yes	Yes	Yes	Yes	No	Yes	Yes
CSO	Partner 1 Kenya	Yes	Yes	No	Yes	Yes	Yes	No
	Partner 2 Kenya	Yes	Yes	No	Yes	Yes	Yes	No
	Plan Ethiopia	Yes	Yes	Yes	Yes	No	Yes	No
	NRTP	Yes	Yes	Yes	Yes	No	Yes	Yes

Source: Evaluation Team, based on interviews and project documentation

With the exception of Plan International Finland, the partners lack an intersectional approach to discrimination and power relations.

Finding 5: The selection of partners is key. Actors working on headwind issues and challenging contexts are already focusing on the human rights of marginalised and/or discriminated groups and are generally also knowledgeable of HRBA. The combination of both the MFA HRBA guidelines and partners' internal guides on HRBA and other transformative approaches has strengthened the application of HRBA.

The MFA has been active in stressing the importance of HRBA, and the partner's own HRBA guidelines have played an equally important role. UNFPA, as a UN body, follows mandatory HRBA guidelines, and the Somalia country programme demonstrates a comprehensive HRBA practice with a focus on both rights-holders and duty-bearers and the rights-based principles. The programme also has a GTA. The multilateral instrument, at least when the multilateral is a UN body, has the advantage that in addition to the MFA HRBA guidance note, the dialogue on HRBA can also be anchored in guidelines and tools of the partner. This dual emphasis on HRBA is a strength of the instrument that could be used further by the MFA, particularly when the partner fails to apply its own guidelines. While UNFPA in Somalia and Tanzania (example included in the case study on long-term development cooperation) both demonstrated a strong application of HRBA, UNFPA

---

21 Both male and female same-sex sexual activity is illegal in Ethiopia, Somalia, and Afghanistan.

22 As students prior to the Taliban takeover, and as married underage girls.

in Iraq (case study: From cross-cutting objectives to HRBA, lessons from disability programming) needed strong prodding from the MFA to stay on course.

Partners to the KIOS Foundation are explicitly requested to apply HRBA, the objectives of the supported interventions should target both human rights as end goals, rights-based principles permeate the project processes, and aim for structural change. Plan International Finland has comprehensive HRBA and GTA guidelines, and The Network for Religious and Traditional Peacemakers follows FCA's standards and reflects on limitations to the approach in nexus and peacebuilding work in the project document (KIIs, partner, project documentation). The Network raises that there is a challenge to hold duty-bearers to account for not fulfilling their obligations or for human rights violations at the same time as representatives of the rights-holders attempt to engage in peace talks. To be able to hold perpetrators in power accountable, peace talks need to take place, and it will only be possible to raise claims, if at all, after a peace agreement.

All reviewed interventions have in common that their Theories of Change are built on in-depth power analyses of the actors they target, though they generally could have a stronger intersectional approach.

Finding 6: Large variation in how HRBA is applied by partners in headwinds, particularly in how rights-based principles are put into practice in project/programme processes.

The HRBA is applied in all examples with contextual adaptations and to various degrees. The sample is too small to draw conclusions at an instrument or actor level since the six interventions are supported by three different instruments and implemented in five countries. However, the five CSO partners representing two instruments demonstrate large variations in how HRBA is applied. Two interventions supported by the civil society instrument stand out as examples where human rights goals are combined with equal focus on putting rights-based principles into practice in the implementation (Plan International Finland 2021 project documentation, KIOS-suported project's documents). In contrast, MSIA supported by the bilateral instrument, pays less attention to the rights-based process (project document). The intervention focuses on access to information on SRHR and services. Human rights are mentioned in the project document but not in reports, and HRBA is not explicitly mentioned[23]. In comparison, the UNFPA has a holistic approach, and the Network of religious and traditional peacemakers explicitly discusses the limitations of HRBA in their nexus approach.

Finally, it is worth mentioning that headwind issues are also salient for the two countries included in the case study on long-term cooperation.

2.2   Findings regarding effectiveness

The effectiveness of the application of HRBA concerns both improved human rights and the Rule of Law, as well as how rights-based principles are practised by implementing partners. HRBA is about achieving a better human rights situation as an end goal but also contributing to a better understanding among rights-holders and duty-bearers of how the practice of HRBA lays the ground for the respect and fulfilment of human rights. These two dimensions of results from HRBA should be considered when discussing effectiveness but also added value. In contexts of shrinking space

---

23   There is an Annex to the programme document that refers to the HRBA principles in relation to the situation in Afghanistan, but not how they could be practiced by the project.

and limited space for accountability claims, process-oriented outcomes might be the only way forward. Putting HRBA into practice will still allow focus on human rights principles and maybe, as the case study indicates, a deliberate and strategic choice on how to promote human rights in challenging contexts.

Finding 7: Results at the societal level span from attitude and behaviour shifts among duty-bearers at local service delivery posts (e.g., health clinics, police stations, local courthouses, and community structures) to institutional changes or policy reforms.

The examples below illustrate how the reviewed sample of interventions report on their contribution to the fulfilment of human rights.

Two of the interventions report changes at a higher institutional or policy level with the potential to impact the lives of rights-holders at a larger scale. These results demonstrate outcomes from strategic and long-term advocacy work and accountability claims. Being multilateral, **UNFPA** has direct access to ministries at the federal level and participates in strategic coordination groups on health, SRHR, gender equality, and population statistics. Advocacy efforts on SRHR and GBV target religious leaders, the community at large, health workers, ministries, and the parliament. The support to service provision and coordination with local duty-bearers (midwives, other health workers) create legitimacy and trust as an expert knowledgeable of the local realities. This has enabled UNFPA to be bold and to influence the positions of moral and technical duty-bearers and policymakers on SRHR and harmful practices. The dialogue with the government as part of the **UNFPA country programme in Somalia** has resulted in positive **SRHR policy development**, and the technical assistance for a **rights-based curriculum for midwives** students contributed to an institutional change. As mentioned, the facilitation of dialogue between Somali religious leaders and invited religious scholars from other contexts on FGM/C and the Quran contributed to **a ban on the most extreme forms of FGM** (UN Somalia Joint Fund, 2022).

The strategy of a **KIOS** partner is to use strategic litigation to defend its constitutional right to register as an LGBTQI organisation is built on its expert role in providing legal aid to members and other LGBTQI rights-holders, as well as the established relations with the judiciary, gained through providing training to judges and the police on LGBTQI issues. Despite the fact that the rights of LGBTQI persons are highly contested in Kenyan society, the partner can, with its mandate as a national member-based organisation and its capacity for in-depth risk analysis and close monitoring of the opposition, continue to push boundaries. The project's strategic litigation resulted in a Supreme Court ruling in favour of the right to register as LGBTQI organisations, which has positive implications for the civic space of other LGBTQI CSOs as well. The partner can now identify as an LGBTQI organisation and is registered as such. The ruling has been contested by members of the parliament and the government, but the judges are not backing down on their ruling based on the constitution.

Finding 8: The results at the rights-holder level involve increased services to rights-holders who are hard to reach or previously excluded from the services, either through better access to public services or by (gap-filling) services provided by the implementing partners.

The results below are examples of rights-holders exercising their right to health, family planning options, being treated with respect and receiving protection, among other positive effects (**UNFPA country programme in Somalia**); marginalised women are granted access to health (accessible, affordable, and quality SRHR services), and the choice of spacing births, (though women still need the approval from husbands or mothers-in-law) (**MSIA**). **Yene Raey 2** by **Plan Ethiopia**, aims to

contribute to mind shifts through norm-changing work with boys, parents, traditional and religious leaders, and local community structures, which is expected to lead to girl's empowerment and the possibility of bodily autonomy.

The first three examples are primarily related to health rights, with a particular focus on SRHR. The positive outcomes are based on a human rights framework but have been framed in a discourse of how access to health services has a positive impact on local/national development and/or the well-being of the family. This was, in all cases, a deliberate choice of the implementing partners.

The **UNFPA Somalia programme** reports on rights-holders increased access to SRH information through service delivery (including safe houses, one-stop centres and mobile clinics) and training with youth (UN Somalia Joint Fund, 2022). Accountability claims on services by midwives result in **clients being treated with respect.** Access to family planning options for women that otherwise would not have access to contraceptives. The services and GBV campaigns contribute to the **protection, security, and legal action for GBV survivors** and advocacy against FGM as a **key human right** for women and girls. These outcomes, as the example above under finding 7 are supported by the recognition and legitimacy UNFPA has through its close collaboration with different stakeholders and the possibility to also provide services.

The **Integrated Reproductive and Maternal Health Programme Phase VII - MSIA** reports on access to SRH services and family planning alternatives to women that otherwise would not have these rights, which has led to women exercising their reproductive rights and choices, including medical attention to other sexual and reproductive health issues, and decrease in post-abortion complications and maternal deaths (project document). The awareness-raising efforts have resulted in reduced stigma around family planning, behaviour change and shift in mindsets both of gatekeepers (religious leaders, community elders, family members) and women themselves.

The second phase of the **Yene Raey project by Plan Ethiopia** expects to contribute to the following human rights outcomes[24]: Attitude shifts in traditional social gender norms hindering girls' freedoms and rights; increased access to SRHR for girls and women and youth-friendly SRH services; strengthened awareness and protection among parents, community leaders, service providers and law enforcement actors against harmful practices; increased reporting on and decrease in GBV, CEFM and FGM. The latter is an emerging outcome where communities and parents have started to take action by reporting parents forcing their daughters to marry or planning to perform FGM on them.

The two projects in Kenya focusing on the rights of LGBTQI persons report on the following kinds of achieved changes:

Access to justice through awareness raising and the provision of legal aid to a very marginalised group that would not seek justice without the support (programme document). Results include the protection of and provision of safe spaces for LGBTQI persons, including those with or without disabilities, as well as LGBTQI refugees. The CSO has, through legal aid, contributed to access to information, justice and the Rule of Law for rights-holders that would not seek justice without the support. LGBTQI persons are exposed to serious discrimination. With the support from the project, individual rights-holders have been able to take their cases to court or other instances. The increased awareness and sense of legal protection have led to increased reporting on human rights violations of LGBTQI persons. The project contributed to the access to safe premises and

---

24   The 2nd phase of Plan Ethiopia's project is too recent to report on outcomes.

safe spaces for capacity and movement building, which particularly benefitted LBT women and other minority groups within the LGBTQI community.

Legal and constitutional awareness of members, the broader LGBTQI community (rights to service delivery health and legal services/justice system, how to participate in local processes) and among local duty-bearers (project document). Particularly targeted lawyers and health workers, other parts of the judiciary as well as the police are also reached. The project contributed to the improved understanding of the loca lLGBTQI community of their human rights entitlements, how to manage physical security and know which service delivery facilities are safe for LGBTQI persons, including county public health facilities as well as the police stations. Change was recorded in health workers' attitudes, and LGBTQI persons reported better treatment and attitudes among health workers. The local police also report on the shift in practices of arbitrary "gay arrests", a statement in part validated by the experience from members showing a change in police attitudes. The final report also stresses increased awareness of the situation of the LGBTQI community among local and county duty-bearers, such as health workers, the judiciary, the police and local administration. Attitude changes at the family level are also reported outcomes.

The reported results above demonstrate that it has been possible to contribute to both smaller but significant and major changes related to very contested rights. These results have been possible to achieve thanks to strategic choices on how to engage both rights-holders and duty-bearers, as well as how to discuss the rights with different types and layers of duty-bearers.

The Network for Religious and Traditional Peacemakers intervention differs in character through its nexus approach and focus on peacebuilding, by being a global network and through its work both at the global level and in conflict settings. It does not fit a standard HRBA. However, rights-based principles guide its design and processes with a focus on participation, access to information, capacities to mediate in an inclusive[25] manner, promoting women's participation and gender equality. The reviewed report provides numerous examples of high-level policy dialogue, as well as in-depth efforts to strengthen the religious and traditional leaders and their networks to engage in strategic dialogue and mediation for peace. The Network report that it has contributed to the participation of groups normally excluded from the dialogue, e.g., women and young persons. The report accounts for religious and traditional leaders accepting gender equality as a goal and norm of inclusive participation.

2.3   Findings related to added value

The practice of transparent, accountable, participatory, and inclusive programme design and management has also rendered results.

Finding 9: The practice of rights-based principles has led to a more rights-aware, advocacy skilled and capable LGBTQI community in Kenya which enables rights-holder-driven advocacy for human rights for all and accountability claims on different duty-bearers. Given the challenging context, LGBTQI persons will most probably not gain full respect for their human rights without a strong movement backed by evidence-based advocacy.

---

25   There are inclusiveness guidelines on accessibility to meetings, gender equality, etc.

KIOS' partners, are both member-based CSOs that, through participatory and inclusive methods, build the capacities of LGBTQI activists and communities. They provide spaces for reflection and learning. Rights-holders have increased awareness of their legal rights and practice how to defend their rights. Community and stakeholders' consultation events and accountability forums further enhance the understanding of how to apply rights-based advocacy and accountability claims. Methods used to create participation and safe spaces also contribute to awareness of HRBA principles. One partner provides legal aid and paralegal training on the own demand of rights-holders, both as a means and goal to enhance their civic participation and engagement in decision-making. LGBTQI rights-holders participate in planning, monitoring, and evidence-based data collection for litigation cases. Rights-based principles, gender transformative and intersectional approaches guide one partner in how interventions are implemented. Members actively participate in dialogue events with other key stakeholders like local government and religious leaders, based on project documentation.

Finding 10: Focus on internal inclusive, participatory, and democratic processes and structures has prepared implementing actors and deepened their knowledge. By walking the talk, leadership, staff, members, and involved stakeholders, gain legitimacy for their rights claims by giving an example and by increasing their own understanding of how to live up to rights-based principles.

The **UNFPA** country programme advocates for access to SRH information and services in youth-friendly spaces and the inclusion of young people in national policy processes. The awareness-raising and mobilisation of rights-holders in Somalia, particularly young people, have contributed to increased participation in development processes and the possibility of claiming rights. The claims are not only raised to external duty-bearers but also practised within the programme. There is a youth advisory board for the programme, and young people's participation and influence over programme management are emphasised, based on the programme documentation.

Young rights-holders take an active part in the full project cycle of **Plan Ethiopia**, including advocacy, peer, and monitoring activities. The one-year rights-based and GTA empowerment training truly builds the capacities of young people to demand their rights and become SRHR champions. Boys are specially targeted in discussions on gender norms to contribute to new gender champions.

The Network for Religious and Traditional Peacemakers pays attention to rights-based principles also internally in the network. Accountability and transparency are at the forefront of the processes targeting both the religious and traditional leaders and their role in dialogue and mediation, as well as in the advocacy work addressing duty-bearers at different levels. There is active work challenging discriminatory norms and practices both in peace processes, in local society and among religious and traditional leaders (programme documentation).

Finding 11: Partners working in headwinds demonstrated that they have capitalised on the fact that HRBA encourages in-depth analyses of the human rights situation. HRBA in headwinds has added value to risk management through the practice of the partners to conduct thorough power and stakeholder analysis.

The added value of applying HRBA in challenging contexts is, among other aspects, that it encourages Finland's partners to carry out in-depth analyses both on the human rights situation in general and the context, as well as the risks of working on specific rights. If the instructions from the HRBA guiding note and instrument-specific guides are followed, this should equip the organisations with a more realistic and flexible approach to both implementation and risk management. The examples

in this case study show that most partners working in headwinds follow the instructions and base their risk management on an in-depth analysis of the human rights situation.

The application of the rights-based principles in project implementation with a focus on meaningful and inclusive participation has helped the organisation to keep the "ear to the ground" and understand at what level it is possible to engage in constructive dialogue with duty-bearers.

The application of HRBA in headwinds has also added value to risk management through the necessity to conduct a thorough power and stakeholder analysis, identifying possible enablers and allies, as well as opponents to the rights in focus.

2.4   Findings risk management

In all instruments and interventions part of the case study, there are examples of flexible and adaptive HRBA terminology as well as language on specific rights. Practically all adaptations are related to risk analysis and management and can be considered as how partners have applied a *do no harm* approach, which is the minimum requirement by the MFA.

Finding 12. All interventions in the case study demonstrate a high level of risk awareness of using HRBA in headwinds, including how the human rights-based approach is communicated and promoted, avoiding sensitive wordings as well as accepting what rights are possible to currently promote.

Sensitive and context-specific language. In SRHR interventions, there is a deliberate use of socially accepted terminology without shifting the level of desired outcomes for the rights in focus. Terms like family planning or birth spacing are favoured over reproductive rights in public discussions, while internal discussions are fully rights-based, and new staff members are introduced to and expected to agree with the organisation's SRHR policy.[26] In some cases, the global instruments and guidelines of an organisation are followed but cannot be referred to in the local context. The same organisation shared that the project has a stronger focus on gender equality than in other country projects that are part of the global land project due to the sensitivity of some of the SRHR. For instance, the terms CSE and child marriage are in some contexts replaced with other concepts such as life skills and early marriage[27], while value clarification on the rights in focus is done with all stakeholders, including staff (KII, partner).

To mitigate resistance to family planning, MSIA has been seeking approval from husbands for the services offered to women. MSIA had to align to Islamic jurisprudence and adjust language and indicators in the results framework after the Taliban takeover, but operations continued thanks to the sex-separated services, where women clients were attended by only women health workers (based on the project documentation). This is an example of how *do no harm* has been conceptualised, enabling the health clinics to continue with the services without causing conflict with the new regime.

---

26   UNFPA, MSIA and Plan Ethiopia.

27   Terminology used both in Ethiopia and Somalia when in dialogue with religious leaders.

While this means that operations can continue and that married women can access vital services, the approach can hardly be seen as gender-sensitive (which is the level MSIA states the project had when designed) anymore, and it also raises the question of how far adaptation can be stretched and still be viewed as rights-based. Having said that, the current situation in Afghanistan is extreme, and a different practice would have meant great risks for both women rights-holders and staff.

Finding 13: Working on contested human rights poses high demands on risk awareness and HRBA knowledge, which fosters organisations capable of applying HRBA and understanding its boundaries. The MFA has selected partners working in headwinds that understand these boundaries.

Finland has selected partners working in headwinds that generally have deep knowledge of HRBA principles and the capacity to analyse the boundaries of the approach given the context and targeted issues. They have a high awareness of risks related to HRBA and human rights language and how to meet the requirement of a *do no harm* approach. This is reflected in adaptations of used terminology, approaches to local stakeholders and how different rights are framed in the external communication while not compromising with the HRBA in internal documents or process-wise in the implementation. For example, practically all partners working on SRHR use the term birth spacing, focusing on the health of the mother and her ability to care for the already-born children in external communication, child marriage is avoided in Somalia, and the term early marriage is preferred in a context where menstruation is perceived as an indicator of female adulthood, and key populations or sexual minorities used instead of LGBTQI.

As observed with HRBA in conflict, some interventions confront human rights abuses through example, stimulating reporting (FGM/CEFM/SGBV) or strategic litigation, while others adopt a more dialogue-oriented approach, keeping part of the work under the radar of the public debate and through providing technical support, as for instance in curricula development for midwife students or training material for service providers within the judiciary or health sectors.

Finding 14. Actors promoting contested rights value and invest in alliance building.

The sample also indicates that actors working on contested issues value and see the need for broad alliance building, both as a strategy to minimise risks but also to target allies with necessary discussions on discriminatory norms and shifts towards more inclusive human rights agendas (e.g., child protection versus the right to CSE, LGBTQI rights being understood by gender binary focussed Women Rights Organisations.)

Another aspect of seeking alliances with moral duty-bearers/gatekeepers, i.e., religious and traditional leaders, parents and CSOs that have been targeted to shift their mindsets and become local champions, is the risk of human rights messages being diluted. While they can be truly instrumental in open-up discussions, they might also be less progressive champions with certain aspects of the rights, or specific groups, that are left out in their messages. This was something that was raised by respondents both in Kenya and Somalia (KII, partner).

Partners to **KIOS** stressed that the outreach to duty-bearers depends on their willingness and openness to engage with the LGBTQI movement, a space that is currently closing due to the demands in the public debate and the negative statements by the Kenyan president (KII, partner) (Ombok, 2023).

MSIA's close relationship with religious leaders was an enabling factor during Phase VII (2018-2020), which is the period included in the case study sample. This collaboration continued in the next phase, also supported by Finland and Sida, and became even more crucial after the takeover of the Taliban in 2021 (Kluyskens & Holmberg, 2023) (project documentation).

In the current project of Plan International Finland, Plan Ethiopia can, for the first time, explicitly work on rights, thanks to the new Civil Society Proclamation from 2019 (Unesco, n.d.). However, SRHR for girls continue to be a headwind issue, and the project in Ethiopia has, therefore, more focus on gender equality than in other country projects of the global project My Body, My Rights (KII, partner).

Finding 15. Despite good capacity in risk management, most of the interventions do not use opposition monitoring as a tool.

Opposition monitoring is part of the risk management approach by the LGBTQI implementing organisations, which includes seeking support from allies within ministries, local authorities and other CSOs to avoid the opposition hijacking spaces and agendas. Opposition monitoring was not something that stood out in the SRHR interventions in the sample.

As mentioned above in 2.1 (finding 3), the work with the religious leaders is an approach to many headwind issues and is fundamental in some contexts to be able to operate. As in the case of MSIA, the work is adapted and contextualised to the traditional and patriarchal structure and can only, to a limited extent, challenge social norms. The services are presented as coherent with religious scholars' interpretation of the Quran without challenging religious values. As such, root causes might not be addressed, but the project still challenges beliefs and customs that lead to the denial of SRHR services.

Finding 16. Special safety measures applied to protect human rights defenders.

The two partners to KIOS in Kenya applied both planned risk mitigation strategies and additional safety measures based on updated risk assessment. Providing safety to human rights defenders, including refugees (there is an increasing demand from LGBTQI refugees from neighbouring countries) was already part of the project design. This includes offering safe spaces for reflection, strategising, and recreation to LGBTQI activists (programme documentation). Threats are mainly from the police and the general public, including family and relatives, and less from governmental institutions other than the police. Security measures have been further strengthened, and precautionary measures have been taken to avoid negative attention. The partners seek strategic alliances with lawyers, other actors within the judiciary and the police, as well as within the county administration, to have support for their work and has an open approach to society sharing their messages broadly. This approach comes with risks, and the organisation sees the need to regularly update and improve their security protocol and measures (KII, partner).

3   Conclusions

The case study demonstrates that the MFA has been active in stressing the importance of HRBA, but it is primarily the **selection of already HRBA and skilled, committed partners** that impact the level of application of HRBA in the different instruments in headwind contexts and issues. Partners working on contested issues already have a focus on rights, and though they might combine the HRBA within a service provision role, the services are normally used for awareness raising, outreach to rights-holders and/or shifts in attitudes and norms by other service providers and the local community. The conclusion is that **combining advocacy work with technical support to local duty-bearers in their role as service providers** is a constructive approach that facilitates dialogue on human rights in headwinds. It builds relations that facilitate dialogue and the capacities of service providers in a manner that enables them to understand and change discriminatory attitudes and behaviours without confrontative claims of accountability. Having said that, the focus on rights for different rights-holders tends to be mostly along gender, age, and disability dimensions. A more explicit expectation from the MFA of an intersectional analysis of rights-holder groups could have guided the partners to deepen their approach to non-discrimination and inclusiveness. (See findings 1,2, 5, 6, and 10.)

The strategy to combine advocacy work with technical support is related to a **constructive dialogue approach and a deep understanding of the role of different duty-bearers,** a feature that stands out in all interventions in the sample. The case study has shown the importance of comprehensive context and stakeholder analyses, as well as a regular update of these analyses for work on human rights in challenging contexts. HRBA in headwinds requires a close relation with duty-bearers at different levels both as a formal requirement in authoritarian settings and as a strategy to seek and build alliances with formal and moral duty-bearers for them to ideally become brokers, or even champions of, or at least not opponents to, the rights in focus. This is particularly key when the rights are perceived as challenging moral, religious and/or cultural beliefs. The case study showed good results when implementing partners had in-depth dialogue with religious and traditional leaders as well as with local duty-bearers. However, the examples had a stronger focus on the local, and particularly the moral duty-bearers, which will, if the objectives are attained, mainly lead to changes at the local level, and thus risk to being "islands of success" without structural impact and effect at society at large. (See findings 2, 3 and 6.)

Dialogue with duty-bearers, not explicit accountability claims, is seen as the most viable application of HRBA in headwinds. The instruments included in the sample (bilateral, multi-bi, CSO) have enabled HRBA in headwinds. However, accountability strategies targeting duty-bearers might be approached differently to some standard aspects of the HRBA guidelines. In an enabling environment for human rights, advocacy actors can choose confrontative methods, claiming accountability for failed fulfilment of commitments. While all interventions included in the case study are explicit in their reference to HRBA and use human rights language to describe their work, their main strategy is to engage with duty-bearers through close dialogue, not by explicitly claiming their accountability. The strategy is to convince and get duty-bearers on board rather than shaming them. (See findings 2 and 3.)

The cross-cutting objectives of gender equality and disability rights are also embedded in the rights-based principles of non-discrimination, inclusion, and participation. The case study shows

that it is possible to apply all rights-based principles, even in headwinds, and that the reviewed interventions had a strong focus on the inclusion of marginalised groups, including **persons with disabilities**. The case study concludes that this can be attributed to Finland's promotion of the rights of persons with disabilities. It also shows that while it is **not always clear if the inclusion of women (and girls) and persons with disabilities is the result of partners observing the requirements on CCOs or if it is a response to HRBA**, they reinforce partners' inclusion of these rights-holders. At the same time, the case study indicates, as also mentioned above, that focus on other marginalised groups is less evident and that the interventions, in most cases, lack an intersectional approach. (See findings 4 and 6.)

The **effectiveness** of the reviewed interventions is most salient at the **rights-holder level** though some changes at the societal level were also identified. The application of HRBA rendered more respect and quality services from service providers and actors within the judiciary and the police. This shows that it is possible to create conditions for the fulfilment and protection of also contested human rights but that the challenging contexts might hinder structural changes that permeate society. The reported (and expected) results demonstrate that it has been possible to contribute to both smaller but significant and major changes related to very contested rights. These results have been possible to achieve thanks to strategic choices by particularly the CSO partners on how to engage both rights-holders and duty-bearers, as well as how to discuss the rights with different types and layers of duty-bearers. The practice of rights-based principles thus adds value and becomes therefore even more important since showing the example at implementation or organisational scale both foster leadership, staff, members, and involved stakeholders by walking the talk, giving more legitimacy to their rights claims. The case study showed the importance of remaining committed also to the internal practice of HRBA by the implementing partners. That requires a deliberate follow-up by the partner on its own practices, but also that this is discussed between the MFA and its partners. The MFA monitoring of HRBA practice is an area that could be much improved. (See findings 2, 3, 7, 8, 9 and 10,)

The high level of **risk awareness** among implementing partners is also related to the use of HRBA. Furthermore, the case study concludes that HRBA is instrumental and adds value to risk management through the necessity to conduct a thorough power and stakeholder analysis. Through the do o harm approach and in-depth understanding of the risks of sensitive language, and contextually adapted communication strategies, the implementing partners showed that it is still possible to challenge discriminatory norms and promote contested human rights. The MFA has selected partners working in headwinds that understand these boundaries and that value and invest in alliance building. However, they could invest more in **opposition monitoring** and seek alternatives on how to support the most stigmatised groups, like LGBTQI persons. It seemed that when the principle of "leave no one behind" becomes too challenging technical advice by expert actors is not pursued by most implementing partners. (See findings 10, 11, 12,13,14, and 15.)

The two partners working on the rights of LGBTQI persons showed a good understanding of how to develop safety measures to protect human rights defenders, a knowledge that could be shared with other actors working in headwinds or in other settings. (See findings 10, 11 and 16.)

4   Lessons learnt

The risk management approaches of partners working in headwind contexts and on headwind issues are relevant to share with other MFA partners. Equally, it would be good to provide opportunities to learn and share experiences from the practice of opposition monitoring conducted by CSOs within LGBTQI and global SRHR communities, as well as how to work on LGBTQI issues in headwind contexts.

It is possible to do more than provide services in extreme settings, and there is an opportunity to learn from how these partners combine health or legal services with outreach and grassroots mobilisation strategies. The case study shows how the HRBA assessment criteria on how to work with duty-bearer need to be contextualised to what is possible and strategic in headwind contexts and headwinds issues.

CASE STUDY:
FROM CROSS-CUTTING OBJECTIVES TO HRBA, LESSONS FROM DISABILITY IN DEVELOPMENT COOPERATION

1   Purpose, scope and methods

The case study is based on a review of 15 interventions targeted towards disability issues (**Table 12**) to **assess if and how a transition has been made from a charity perspective to a more explicit and ambitious HRBA.** At the outset, it was recognised that disability interventions were seen as somewhat of a flagship of Finland's application and approach to HRBA. The case study has looked at the accuracy of those perceptions, the factors behind this 'success' and whether there are lessons and practices that could be applied more broadly.

In addition to the interventions initially selected for this case study, findings related to partners of those receiving direct support have been included, as well as partners interviewed as part of other case studies. This has involved assessing whether underlying ableist attitudes have been confronted within the MFA and among stakeholders, with particular emphasis on the role of OPDs in driving these changes. At the outset, it was apparent that the organisations receiving support for disability-focused initiatives could be categorised as follows:

Norm setting: The MFA supports two apex Finnish disability organisations and one UN multi-partner trust fund, all of which work with and on behalf of the MFA to define and refine understanding among sub-grantee OPDs, UN agencies and other partners regarding the implications of HRBA for disability efforts. This includes working to increase the effectiveness of these HRBA efforts and mitigate potential risks of 'doing harm' by accepting prevailing attitudes and backsliding into ableist and charity norms. Their role in capacity strengthening related to HRBA norms receives particular focus in the case study.

Progressive and transformative partners with a comprehensive understanding of HRBA concepts: These interventions are led by Finnish and local partners that are clearly familiar with and committed to overcoming ableist norms through HRBA, i.e., they represent highly varied examples of 'walking the talk'. They primarily receive CSO support or are local OPDs receiving sub-grants from Finnish CSOs.

Progressive and transformative partners that act intuitively: These OPD-led interventions, which are mostly supported through funds for local cooperation, appear to reflect commitments to HRBA but apply relatively limited explicit use of HRBA terminology and concepts. Their approaches reflect an implicit understanding of the importance of self-empowerment of persons with disabilities and a rejection of past charity perspectives. These examples include many very small OPDs (sub-grantees or organisations receiving FLC support) that lack the knowledge and capacities for 'isomorphic mimicry'. i.e., use of the standard Northern HRBA discourse that larger agencies employ. These examples also illustrate lessons related to Finland's commitment to achieving results through support to small local OPDs that lack rhetorical skills.

Partners that are in the process of learning how to break out of non-HRBA norms: Some interventions indicate initial and partial steps to move away from past charity or ableist perspectives. Analysis has focused on if and how HRBA perspectives may be gradually influencing stakeholders that have yet to fully overcome past perspectives.

Table 12. Sample of the case study – disability interventions

COOPERATION INSTRUMENT	INTERVENTION NAME	COUNTRY	IMPLEMENTED BY
CSO	Disability Partnership Finland Development Cooperation Programme 2022-2025	global	DPF
CSO	Abilis Foundation Global Programme 2022-2025	global	Abilis
Multilateral	UNPRPD MPTF	global	UN
CSO	Promoting Sexual and Reproductive Health of Women and Girls with Disabilities in Kenyan Health Services	Kenya	Physicians for Social Responsibility Finland
CSO	Mongolian deaf community's linguistic identity empowerment	Mongolia	Lähetysyhdistys Kylväjä ry/ Finnish Lutheran Overseas Mission (FLOM)
CSO	Unlocking doors to basic health and education for children with Sensory disabilities in Bara and Parsa districts of Nepal	Nepal	Physicians for Social Responsibility Finland
CSO	Women Challenged to Challenge	Kenya	Physicians for Social Responsibility Finland (PSR)
CSO	Kenyan Association for the Intellectually Handicapped	Kenya	Disability Partnership Finland (also support from Abilis)
Multilateral	Empowering Adolescents with disabilities through Education and Civic engagement programs in the Ninewa Governorate	Iraq	UNFPA
FLC	Mali na Daftari in Livelihood resilience for so in Tanzania	Tanzania	Tanzania Federation of Disabled Peoples' Organisations (SHIVYAWATA)
FLC	The Able Disabled	Armenia	CivilNet
FLC	Decent Employment for all Azerbaijan	Azerbaijan	Union of Disabled People's Organization of Azerbaijan
PSI (Finnpartnership)	Sera Helsinki's project expands to empower people with disabilities	Ethiopia	Sera Helsinki Oy
CSO	Sustainable livelihoods for vulnerable children and youth in Tanzania	Tanzania	Finlands Svenska Pingstmission
Multilateral (multi-bi)	Delivering on a child's right to education: Strengthening access and quality of learning in Syria	Syria	UNICEF
CSO	Also some observations related to other projects in Somalia: Hiil Hooyo (also part of conflict case study) led by the FSN and GAVO led by the Physicians for Social Responsibility	Somalia	

Source: Evaluation Team

This case study is based on a review of these fifteen interventions and also examples from other case studies (most notably in Somalia). The majority of the interventions (8) were from CSO, and (3) FCL instruments, with two multilateral and one private sector example included. The emphasis on CSO and FCL instruments reflects the prominence of disability interventions in these instruments.

The methods applied in the case study began with in-depth KIIs with selected MFA staff and the normative partners at the start of the case study to gain an understanding of how HRBA norms are being pursued within their organisations and among their partners within Finland's disability efforts more broadly. The analysis of the other interventions was primarily undertaken by documentation review, complemented by KIIs with selected stakeholders.

2   Overview of context

Finland has a unique structure with which to promote the application of HRBA in both specific and mainstream disability-related development cooperation. This includes strong and experienced organisations with capacities and credibility to advocate and to develop capacities among others to 'walk the talk' of disability inclusion. There are also many partners who recognise disability as a human rights commitment, even if they have mixed capacities and understanding of what this implies for application in practice. This disparate group is supported by unequivocal political and public commitments and a recognition that disability is and should be a flagship of Finland's approach to HRBA. Despite these strong preconditions, it should be stressed that the overall level of resources and resource commitments of duty-bearers in host governments are insufficient to achieve transformational change.

As will be discussed further in the main report, disability inclusion exemplifies a development objective wherein HRBA implies a higher ambition level that transcends what is often framed as cross-cutting objective aims. However, interviews within the MFA indicate that, for many, the differentiation between HRBA and cross-cutting objectives is insufficiently clear. This case study seeks to unpack areas of ambiguity related to how disability inclusion is 'positioned' in the 'continuum' between cross-cutting objectives and HRBA and in so doing, clarify the nature and extent of ambition and how achievements reflect HRBA aims.

In 2018 a Finnish Approach to Addressing the Rights of Persons with Disabilities in Development Cooperation and Policy was issued (MFA, 2018b). It unequivocally emphasises the "Finnish Model" for addressing disability rights with human rights at its core:

> *The Finnish Model for addressing inequality and disability rights can be summarized in four key elements: 1) human rights as the core for all activities. 2) Supporting equal, accessible and non-discriminatory national institutions, strategies and policies and ensuring capacity of duty-bearers at all levels to deliver services and protection for all. This is an investment that delivers sustainable results. 3) Gender equality cuts across all interventions and is a key priority for Finland. 4) Civil society participation, in this case meaningful participation of the Organizations of Persons with Disabilities (DPO) in particular, is a principle without which no sustainable results in terms human rights for persons with disabilities can be achieved. Fully autonomous participation of persons with disabilities in societies is both an important principle as well as one of the goals of the Finnish Development Cooperation.* (MFA, 2018b)

This suggests the importance of giving prominence to the analysis of how development cooperation interventions and cooperation instruments have defined the practical implications of these forceful statements in development cooperation.

These commitments are particularly notable, as globally, disability has commonly been addressed from 'charity' or 'medical' perspectives, wherein persons with disabilities are seen as constituting a 'problem' to be addressed by what has sometimes been referred to as a medical or clinical perspective. These conventional and common approaches are sometimes judged to be acceptable when pursuing aims as a cross-cutting objective. However, many organisations of persons with

disabilities (OPDs) see this as insufficient. They contrast these levels of ambition with a HRBA perspective that recognises the rights of people with disabilities to participate fully in society, i.e., where 'ableist' society needs to change to respond to these rights. While this HRBA perspective is also clearly reflected in the MFA guidelines on the cross-cutting objectives, as this case study will show, there is sometimes a lack of clarity on what this implies for the implementation of HRBA for disability inclusion in practice, I.e., whether there is a shift underway towards these more transformative approaches. MFA support has been used to enable organisations to reflect on what needs to be addressed to raise HRBA ambitions to work towards more systemic change. For example, UNPRPD collaborated with its UN partners in 26 country situation analyses that concluded that the following summarised HRBA relevant areas needed to be addressed that reflect the need for these raised ambitions:

- Defining disability through a medical lens and thereby reinforcing discriminatory attitudes among decision-makers, professionals, the general public, and even among persons with disabilities themselves.

- Laws and policies that lack of concrete implementation plans with explicit targets and disaggregated monitoring indicators.

- Non-functional monitoring mechanisms that are not aligned with the United Nations Convention on the Rights of People with Disabilities (CRPD) and where OPDs are not invited or lack the capacity to participate in monitoring.

- Insufficiently inclusive and community-based services that can demonstrate high enough quality to encourage stakeholders to move away from segregated solutions.

- Insufficient coordination within the disability movement and insufficient capacity to influence policy and development processes.

Adapted from UNPRPD Annual narrative and financial report 2021.

3 Findings

3.1 General issues of direct salience to the case study focus

Finding 1: A fundamental strength of Finnish disability-related development cooperation in being able to reflect HRBA values is the commitment to these being led by persons with disabilities and their organisations, even though working with fragile sub-grantee OPDs may limit the extent to which transformational efforts are pursued.

A striking aspect of HRBA in Finnish disability-related development cooperation is how recognition of the centrality of the 'nothing about us without us' principle prevails in much of the interventions analysed. Partners recognise how a human rights commitment in disability efforts should include an unequivocal principle to work towards ensuring that their own staff and their partnerships are with OPDs that are led by, or at least actively recruit persons with disabilities. Interviews indicated that this is almost universally recognised and reasonably well adhered to, with some notable exceptions. The three normative partners, FLOM, PSR and some partners of Finnish CSOs, consider this to be central to their modus operandi.

However, despite being an important part of moving towards HRBA, working with OPDs is not a panacea for ensuring a transformative stance. Interviews indicate that partners are acutely aware that a focus on OPDs demands readiness to work with weak partners that have not developed HRBA capacities and well-defined commitments. Support via Finnish OPDs and apex OPDs in partner countries inevitably involves relatively basic organisational development and project support to local OPDs. Many of these partners lack offices or even minimal funds for running costs and have limited skills in planning, implementing and reporting. Their capacities to apply HRBA are usually limited, even if their role in implementation is essential if ableism is to be overcome. The HRBA ambition levels of these organisations are consequently quite modest.

Nonetheless, interviews highlight that even a minimal 'seat at the table' of discussions with duty-bearers and opportunities to meet and learn from other persons with disabilities represents a significant step in overcoming their often severe exclusion and providing voice. In various ways, interviewed partners stressed how networking was a very important indicator of results as it represents evidence that the isolation of these organisations was being overcome. Also, having a seat at the table has provided a channel for dialogue with policymakers. Being able to engage in practical matters with policymakers appears to be more important to them than advocacy for disability rights per se.

A notable feature of the 'nothing about us without us' commitments has been that it has created opportunities for non-persons with disabilities-led Finnish CSOs to learn from the Southern OPD partners that they support. This two-way capacity development support was noted by Physicians for Social Responsibility as particularly important as a way to overcome ableist attitudes through a deeper understanding of the ways that small OPDs confront discrimination.

Despite a strong emphasis on working through OPDs as local partners, not all of the organisations have maintained these aims, and with some 'OPDs' most or all staff are not disabled. For example, the Able Disabled project in Armenia was undertaken by a media organisation that was not led by persons with disabilities. They temporarily employed two women with disabilities to manage the project, to produce stories and to lead advocacy for legislative reform.

In another exception, Finlands Svenska Pingstmission (FSPM) works with its local church partners who are described as being well aware of the factors that reproduce discrimination towards persons with disabilities, but have few, if any, staff with disabilities. The documentation on this project makes due reference to issues such as stigma and prejudice, but the ultimate theory of change for how these will be addressed by non-persons with disabilities is unclear. Their capacities were described as being anchored in their long experience of service provision and by a methodology devoted to "making persons with disabilities aware of their rights", as well as sensitising church leaders.

Perhaps related to this lack of persons with disabilities in leadership, the project is an example of an initiative wherein terminology might at first indicate a strong stance on HRBA but where these commitments can be questioned. In general, the project documentation emphasises needs more than rights. The proposal includes a brief summary of the national human rights context, but it is difficult to discern how the activities will respond to what was a rapidly deteriorating human rights situation in Tanzania. MFA comments on the project are divergent, with the same laudatory statements about the organisation's general experience in service provision, contrasted with other comments with harsh critique regarding the lack of experience with HRBA and disability and tendencies to fall back on charity approaches that are not compliant with the CRPD.

Finding 2: Disability interventions are a flagship of Finland's work with inclusion, but lessons are not applied in most other aspects of discrimination.

A few interviewees note, and the evaluation team concurs, that the HRBA principle of non-discrimination has supported an exceptional rise in attention to disability, but not with regard to many other forms of discrimination, with significant gaps regarding ethnicity, religion and indigenous peoples as well as intersectionality between disability and other forms of discrimination. There is little evidence of lessons from disability being used to inform efforts to overcome other aspects of non-discrimination. Disability is treated as a niche rather than as a model. The main exception to this is similarly strong attention to women and girls, where intersectional attention together with disability is a common feature of interventions.

Finding 3: Sensitive service provision is more predominant than transformational advocacy and engagement with duty-bearers, which reflects the nature and roles of OPDs and the demands of their constituents.

Many weak OPDs are oriented towards simple service provision, and it would be unrealistic to expect that they will develop the capacities, commitments or power to seek to hold duty-bearers to account or pursue advocacy and transparency. This is strongly suggested in the descriptions in the documentation of the work of the sub-grantees of Abilis and other Finnish CSOs. These service providers often perceive their roles as to serve their constituents in accessing basic services. Most persons with disabilities that they represent are not aware of their rights. These organisations, therefore, respond to the demands of these rights-holders, which means prioritising access to resources and services as opposed to more transformative ambitions. Respecting the interests of small OPD partners means respecting their more modest requests. Furthermore, there are inherent pressures that reproduce dependence on charity in the disability community. Shifting to a

HRBA paradigm focused on advocacy rather than immediate needs in such circumstances is an uncertain, and thus risky, endeavour for a destitute rights-holder.

Methods for generating discussions around rights are adapted to the target groups and therefore do not reflect standard HRBA processes. One CSO partner described how they used coffee ceremonies in Ethiopia as a way to generate discussions about the needs of the participating women with disabilities, which led to more challenging conversations about gender-based violence and sexual and reproductive health and rights (SRHR). These and other conversations are described as leading to increased voice and self-esteem. As such, psychosocial support has been recognised as part of enabling persons with disabilities, especially women and girls, to participate more in social life. In a similar manner, the Kenya Association of the Intellectually Handicapped (KAIH) applies a "person first" approach that starts with individuals with intellectual disabilities and their families to encourage their "self-advocacy". As such, these examples indicate how advocacy with a small 'a' may play an important role in empowerment, as opposed to the advocacy for policy change that is often assumed to be the aim in HRBA.

3.2 Findings regarding effectiveness

Finding 4: Finland's leadership and a strong focus on disability rights have ensured that disability is 'on the agenda' of partners and is recognised as their responsibility, but the paths through which interventions are expected to become more transformative remain uncertain.

Interviews with MFA staff indicate that the Ministry has succeeded to a considerable extent in raising awareness about disability rights and instilling an awareness of how it can be put into practice. There is consensus that Finland is established as one of the few donors that are leading efforts to ensure that disability rights are part of the development cooperation agenda. Organisations receiving support report that they feel confident that they have a sufficient backup to assume ambitious agendas since they are not alone. This is sometimes contrasted with what is seen as piecemeal support from other donors. Finland stands out in its commitment to disability rights.

MFA interviewees acknowledge, however, that their support is insufficient to address the massive gap in amplifying the voice of rights-holders from the disability community. For the donor community in general and for most host governments, disability is a niche issue. One interviewee mentioned the example that another larger donor ostensibly committed to HRBA had stated that "it was nice that Finland does this", i.e., that someone was working with a disability when it was not a priority for most.

CSO partners interviewed all state that they have been effective in applying HRBA concepts, though some appear to have difficulty defining what HRBA implies beyond inclusive service provision. Some partners indicate that the MFA is satisfied with this inclusive service provision scope as well. All claim that their own organisations have overcome ableist norms, though there is an acknowledgement that some of their local partners remain charity oriented. Based on interviews and documentation review, the evaluation team judges that this level of confidence in transcending charity approaches is not entirely justified. Significant deficiencies remain.

A major proportion of disability support concerns organisational capacity development, given the weak status of many partner OPDs. The evaluation team's overall impressions, based on interviews and scattered references to these processes in reporting, is that the results have been good, with

efforts sometimes devoted to basic organisational management and other times focused more on HRBA. It is, however, difficult to obtain a clear overview of these results given the collegial coaching approaches applied. DPF has recognised this deficiency and is seeking to address it:

> *"Support to capacity building of partner OPDs has focused on the capacity gaps and capacity development needs. The support is implemented according to a tailored plan drafted in cooperation with each partner. However, monitoring of the capacity development plans has not been systematic and annual reports have included limited information on achieved results."* (DPF, 2022)

Larger OPDs are more likely to be aware of and pursue more transformative agendas, but some of these organisations face such enormous obstacles (and, again, have constituents demanding basic services) that they emphasise more modest objectives of accessing resources and pursuing small institutional changes. The Union of Disabled People's Organization of Azerbaijan is an example of this in that they work with concrete and practical issues connected, e.g., encouraging employers to make workplaces more accessible and advocating for changes to labour market regulations to encourage greater inclusion. There is a recognition that a large gap exists between existing legislation protecting the rights of persons with disabilities in labour markets and the implementation of these provisions. Given the constraints facing CSOs working in Azerbaijan, their approach emphasises awareness raising among employers and basic skills for job seekers rather than advocacy towards duty-bearers, per se. Results can be seen in relation to what was, in the past, a very restrictive environment. For example, registered persons with disabilities had identification cards on which it was stated that they were not to be employed. That has now been removed (though not directly related to Finnish support).

Other national apex OPDs, such as SHIVYAWATA highlight a dual role of, on the one hand, providing basic capacity development support to small, weak local partners that are likely to remain charity oriented and, on the other, trying to mobilise resources to undertake policy advocacy, for example by producing a national Convention on the Rights of Persons with Disabilities (CPRD) shadow report. However, resources for convening policy discussions are said to be limited compared to support towards less HRBA-oriented activities such as training and service provision.

Finding 5: Many partners equate HRBA with non-discriminatory inclusion, with other principles of HRBA receiving less attention.

Overall, effectiveness is most apparent in strengthening rights-holder organisations to provide more inclusive/effective services and undertake advocacy for duty-bearers to work more actively for inclusion. The term 'empowerment' is frequently used to refer to this capacity development to promote inclusion. In various ways, the isolation of persons with disabilities is frequently described as resulting in them not knowing their rights. As such, inclusion is the first step in enabling them to recognise and claim their rights. There are examples of rights-holder training being provided directly and also of institutional-level support to help create systems for this capacity development, for example, the creation of sign languages or systems for sign language interpretation in countries where these did not exist, such as in the work of Finnish Lutheran Overseas Mission in Mongolia. These systems and skills are sometimes absolutely fundamental for providing a basis for expressing voice and participating in society for severely excluded populations. DPF and its partners report similar results over time in Albania and Kosovo (DPF, 2022).

The supported organisations have generally had less emphasis on duty-bearers, although implementation through multilateral organisations UNPRPD and UN Women provides entry points to

develop duty-bearer capacities through the UN systems and mandate. The rights-holder emphasis is primarily a reflection of the emphasis on CSO and FLC modalities in the disability-targeted interventions and the prioritisation of OPD strengthening. In order to support duty-bearers, the UNPRPD employs a range of modalities to help other UN agencies rethink and redesign their work to reflect CPRD principles. This is done through training, joint disability situation analyses and general coaching. An example of this from the UNPRPD Annual Narrative and Financial Report 2020 is presented in **Box 6**.

Box 6 CRPD-Compliant Social Protection for Persons with Disabilities

> **CRPD-Compliant Social Protection for Persons with Disabilities**
>
> Through flexible Finnish support, UNPRPD has convened UN agencies to develop a better joint understanding of what the Convention on the Rights of Persons with Disabilities (CPRD) means for their work. They have been able to participate in initiatives such as a joint ILO, UNICEF and IDA programme on CPRD-compliant social protection for persons with disabilities in seven countries that worked with UN country teams and governments. Background papers on the design of cash transfer systems were produced that in turn influenced ILO's Flagship Report, 'World Social Protection Report 2020-2022' and contributed to awareness on disability inclusive social protection, including increased investment in inclusive social protection interventions by UNICEF and Norway.

Finnish support has, in some cases, been tailored to particularly emphasise the inclusion of those groups of persons with disabilities who have not had a voice within the disability community. Some interviewees have noted that the disability community has been male-dominated and has applied a gender lens to ensure that this is overcome (PSR partner Women Challenged to Challenge). Interviewees have frequently noted the particular challenge of including those with intellectual disabilities in development cooperation. Abilis and DPF support to KAIH has ensured that those with intellectual disabilities are not excluded from the wider Kenyan disability community and discourse. UNPRPD notes the importance of this support for persons with intellectual disabilities, referring to this as the "right to public life". Similar HRBA commitments have often been particularly explicit among partners working with hearing impairment as sign language has been seen as a linguistic right leading to a quantum increase in self-confidence in engaging in public life and even in strengthening a sense of identity.

A result noted by some partners has been that of overcoming stigmas that have blocked persons with disabilities from accessing services. In Somalia, the PSR-supported GAVO has reported that it has been able to introduce recognition of mental health as a disability issue which has, in turn, made it easier for women and girls to seek out support. It is acknowledged that the numbers are still small but that this change is nonetheless significant.

SHIVYAWATA, an FLC partner in Tanzania, used Finnish support to analyse and address the obstacles facing persons with disabilities in accessing and using credit. They emphasise the need to overcome attitudes within the disability community that led to assumptions about being recipients of charity, which in turn led to low repayment rates.

Finding 6: MFA and UNPRPD have had important responsibilities for 'reminding' some partners about the CPRD and with that the implications of HRBA for their work.

Particularly in bilateral programming, Finland has at times 'reminded' UN agencies of the HRBA implications of their own corporate commitments, particularly where Finland also provides core funding (UNFPA, UN Women). The review of reporting and interviews indicate that there was an expansion of attention to disability issues by UN Women in Kenya after Finnish 'nudging' and reminders of this aspect of their human rights commitments. MFA nudging has also been used to prod UN agencies to mobilise their own capacities to live up to their stated HRBA aims related to disability. Support to UNFPA in Iraq is an example of where pressure has been applied to live up to the agency's new disability strategy. Comments on the initial UNFPA proposal were used as a 'reminder' to UNFPA that they should explicitly refer to CPRD and other human rights norms. MFA comments to UNFPA have also stressed the importance of living up to commitments to develop inclusive services, i.e., not to establish separate specialised institutional settings. This was problematic in the early stages of the intervention.

Such nudging seems to primarily be a task for the embassies, but the mandate of UNPRPD is also very much focused on raising awareness and mobilising modest resources for UN agencies to reflect and begin to develop plans that reflect commitments to disability rights. A supporting factor in this was the Secretary General's support for integrating disability rights as part of the One UN approach. UNPRPD has been recognised by the MFA as a critically important actor in supporting the implementation of the UN Disability Inclusion Strategy. UNPRPD's various efforts to convene and provide seed money are being used to initiate CRPD conversations in the UN system (**Box 7**).

Box 7. UNPRPD

> UNPRPD recognises that in order to ensure a HRBA to disability in UN programming, and overcome unconscious and deep seated ableist attitudes, they need a clear strategy of accompaniment, along with a steadfast commitment to bring OPDs into the planning processes. This may also mean efforts to link to capacity support for OPDs that are themselves unfamiliar with HRBA.
>
> Of special importance is to work with UN partners to analyse who is represented by the OPD partners, particularly given the male domination in much of the disability community, particularly among the more formal organisations. In this case the efforts are focused on HRBA effectiveness within disability programming and recognising that a focus on disability does not automatically imply a HRBA commitment.

3.3   Findings related to added value

Finding 7: The 'architecture' of support to partner capacities (i.e., via three organisations with dedicated and well-designed support structures) to become more ambitious in how HRBA is applied their disability interventions is well established and illustrates how HRBA commitments add value.

A fundamental aspect of the added value of integrating HRBA into Finnish work with disability lies in the ecosystem that has been created, wherein structures exist to reinforce commitments and

capacities among organisational partners. Availability of coaching support from strong normative partners (Abilis, DPF, UNPRPD) and general flexibility has encouraged a significant degree of localisation to (and capacity development for) OPDs, primarily via CSO and FLC funding, but also in one example through private sector support. In this respect, a stronger rights-holder voice is well served by the current structure. This can involve a spectrum of capacity development as can be summarised as follows:

- Basic organisational skills to maintain a representation of disability groups;

- Service provision-related skills, often with an emphasis on livelihoods support or health services;

- Retraining health care staff to enable them to provide SRHR awareness training to persons with disabilities;

- Awareness raising regarding the implications of the CPRD and HRBA more generally;

- Essential communication skills, particularly sign language, to enable participation in public life;

- Convening smaller OPDs and providing fora for their participation in priority setting, and

- Supporting non-disability-focused Finnish CSOs and businesses to learn from their OPD partners about the implications of HRBA in practice.

Results of this supportive ecosystem can be seen in frequent comments in interviews about the collegial dialogue and networking underway between Southern partners and Abilis and DPF. This appears to have involved both coaching and facilitating contacts with the wider disability community. These engagements constitute a particularly important aspect of rights-holder capacity development for OPDs that otherwise are often particularly challenged by isolation due to their lack of familiarity with international norms and fragmentation in relation to their focus on specific impairments.

Disability interventions are primarily implemented by CSOs through CSO and FCL instruments, along with bilateral projects and some implementation through multilateral organisations. The extent to which HRBA permeates their approaches varies considerably, some having clear HRBA-influenced approaches and theories of change, whereas others remain more charity oriented (often assuming that the provision of disability services in itself is 'HRBA'). The extent to which HRBA efforts by the MFA add value with respect to the transformational qualities of their work relates very much to the civil society actors they represent and their resulting institutional ethos. The added value of Finnish HRBA commitments can be seen in both awareness raising and also providing resources that enable partners to live up to pre-existing commitments.

Despite very strong awareness by Abilis, DPF and UNPRPD of the need for and implications of a shift towards transformational efforts, there is also an awareness that many (perhaps most) are not ready for a transformation. The emphasis of a large proportion of Abilis' support to small local OPDs on basic livelihoods interventions exemplifies this cautious stance in encouraging more transformative foci. In another example, DPF classifies itself as progressive rather than transformative, presumably in recognition of the limited extent to which its partners are actually equipped to take on higher-level transformative ambitions.

Finding 8: Given the emphasis on livelihoods in Finland's support to disability-related development cooperation, it has been important to increase the awareness of what HRBA implies for private sector actors, and some progress has been achieved.

As described above, there is a heavy emphasis on livelihoods in a significant proportion of disability-related projects. This naturally implies that private sector development plays a central role in the achievement of the right to livelihood outcomes. However, the development of businesses that will generate these livelihoods receives relatively little attention. Another important question regarding the added value of HRBA in disability interventions is thus whether it has enabled private sector actors (both Finnish and local business partners) to become more sensitive to human rights and ultimately become more transformative. Given the importance of livelihoods for persons with disabilities and livelihood efforts for OPDs, engagement with the private sector would seem to be an obvious priority. Nonetheless, the evaluation team's review of private sector plans encountered relatively few private sector efforts focused on disability, and some of those appear to adopt a charity approach. There are some notable exceptions.

Box 8. SERA example

SERA EXAMPLE

In one positive private sector example Abilis used its extensive knowledge of the Ethiopian disability community to support the carpet firm Sera Helsinki to understand and manoeuvre within the complex range of Ethiopian OPDs and find a role that respects human rights within prevailing commercial constraints. Sera Helsinki used Finnpartnership support to develop a business to produce high quality carpets made by women persons with disabilities in Ethiopia and market them in Finland (i.e., not ethnic "pity products"). Abilis was familiar with the Ethiopian OPD community and could assist Sera Helsinki in understanding how it could engage in ways that respected these movements and understand the livelihood constraints faced by persons with disabilities in Ethiopia. The resulting business partnership is reported to have created opportunities for conversations about human rights issues and also how to use employment generation to overcome some of the constraints of an ableist and patriarchal society. Sera Helsinki has learned to work with OPDs, some of which were distrustful of profit oriented private sector actors. They have also worked with local authorities and livestock researchers (for wool production) who before this intervention were completely unaware of disability issues and about how to work with international support. Contacts have continued despite serious disruption due to the conflict.

It would be an exaggeration to suggest that HRBA has been central to this intervention or that the initiative is well on its way to transformational status, but interviews indicate a growing awareness on the part of various stakeholders of how to integrate attention to participation and non-discrimination into this commercial enterprise. There is also a clear commitment to seeing this integration with business development as a way to overcome the prevailing charity orientation of some local OPDs and authorities.

Capacity development efforts have been used to develop the understanding of private sector actors about the importance and value of accessible workplaces in Azerbaijan. This is an example of a partner that does not apply explicit HRBA terminology or framing in its work but is strongly focused on the rights to participate in the workforce and public life. Their approach emphasises awareness raising among employers and the development of tools to enable persons with disabilities and

potential employers to come into contact through job search skills and access to information. There is currently a huge deficit in employment opportunities, with only approximately 10% of persons with disabilities estimated to be actively employed in Azerbaijan. In this intervention, Abilis also provided coaching for the Union of Disabled People's Organization of Azerbaijan to enable them to engage with the international disability community and share experiences.

Finding 9: Becoming more transformational is contingent on moving beyond a focus on service provision – progress in this regard has been modest at best.

Several Finnish and local CSOs are oriented towards direct service provision (or supporting sub-grantees to directly provide services), and there is no clear evidence that they, even when coached by the stronger agencies, are shifting towards more transformational roles, suggesting that (with some very notable exceptions) progressive and transformational work among Finnish partners may lead to programming that is largely sensitive among their local OPD partners. There are indications that their awareness of disability rights is becoming clearer, though. For example, when providing capacity development for, e.g., health service providers, this has often been a first opportunity to raise awareness of the rights of persons with disabilities and the responsibility of duty-bearers. Such training constituted an 'eye-opening' experience for health workers in Somalia through the FSN Hiil Hooyo project. This resulted in generating strong engagement, although apparently still at the level of sensitivity, rather than in engaging in transformational initiatives. Other projects are described in interviews as creating opportunities for conversations between small OPDs and local authorities. This is seen as an entry point to finding out what can be done to strengthen duty-bearer accountabilities in ways that reflect local realities.

The prioritisation of service provision is frequently justified by the desperate conditions faced by persons with disabilities that demand, for example, a 'livelihoods first' focus. This implies a needs orientation that can be perceived as limiting how much HRBA can be pursued. Within MFA, one observer described the importance of economic rights when targeting particularly marginalised populations as being the aspect of being 'left behind', which they are most concerned about.

One interviewee noted that many persons with disabilities are focused on accessing charity, mentioning the saying, "Your impairment is your capital". These attitudes make it difficult to participate in mainstream projects when, for example, their loan repayment rates are very low as they assume that loads can be treated as grants. One MFA interviewee noted how government policies also remain anchored in medical/service provision framing and that this can provide a disincentive to HRBA thinking and reinforce tendencies to remain with a cross-cutting objective perspective. The demands of both OPDs and duty-bearers thus may block shifts towards transformative approaches. In the words of one MFA representative, *"One point to highlight is that all Finnish projects are demand-driven, which is not always HRBA. So our aid is focused on needs rather than rights."*

Despite a very strong transformational ethos, Abilis recognises that many of its small, weak OPD partners are not eager to become more transformational. They are inevitably oriented towards livelihood services due to the demands of their constituents. For Abilis, the commitment to working with genuine OPDs led by persons with disabilities weighs more strongly from a HRBA perspective. It would be less appropriate to work with more eloquent and educated human rights advocates without disabilities.

An important aspect of the gap between sensitive and transformational HRBA in disability interventions in general is the extent to which disability is addressed as a CCO versus a component of HRBA. Interviewees are clearly confused about the implications of this differentiation in practice.

One interviewee noted that MFA's projects are largely designed in consultation with sectoral advisors, who are likely not to emphasise this, and thus the advisors working more directly with HRBA have less influence.

Some partners perceive their services to be transformational, given the profound levels of discrimination faced by persons with disabilities. Physicians for Social Responsibility describes the right to SRHR as responding to discriminatory attitudes that consider women and girls with disabilities as genderless and asexual, leading to practices such as forced sterilisations.

Finding 10: The most transformational outcomes of Finnish support have been in enabling persons with disabilities and their organisations to overcome what has often been profound isolation and enhance their self-esteem and dignity.

Part of breaking out of charity frameworks is to work with attitudinal changes to encourage integrated services for both persons with disabilities and the general population. This is at the core of disability-focused interventions related to inclusive education that other donors focus on (see, e.g., ref for Norad evaluation). These aspects of inclusion do not come naturally for all partners.

The MFA reports having to put pressure on UNFPA to uphold inclusion principles in their youth centres in Iraq as the initial tendency was to restrict these facilities to persons with disabilities. In interviews, HRBA has been described as a significant foundation for the dialogue between MFA and UNFPA in Iraq due to concerns that there has sometimes been a tendency to approach the support to youth in ways that reflect the traditional charity orientation of the government and broader society. The project reports anecdotal examples of positive results in enhancing dignity and self-esteem among youths with disabilities, and these have been used to highlight what HRBA results should consist of. A major part of this has been to highlight the dangers of falling into providing segregated facilities and services that fail to support better societal integration.

Abilis emphasises the social empowerment aspects of inclusion in their work in response to the particular problems of isolation facing persons with disabilities. This focus on the position of the individual has been noted as unique (Coventry & Toikka, 2020). Unusual targets such as numbers of friendships and participation in events reflect the seemingly mundane but fundamental aspects of inclusion given rights-holder the socio-cultural factors that frequently lead to severe isolation and exclusion. Abilis is aware that many of its partners have had virtually no contact with persons with other forms of disability or from outside their localities, which makes these socialisation aspects particularly important.

Partners supported by FLC and local partners in CSO projects thus often (but not always) have weak HRBA understanding and approaches. FLC interventions in, for example, Azerbaijan and Armenia indicate some pre-existing awareness of discrimination issues but little progress towards more progressive approaches. This is partially related to the prevailing political climate and the very small scope of this support. By contrast, FLC support in Tanzania has contributed to an organisation that already had a thorough understanding of HRBA and broader access to funding and possibly channels for political influence, so opportunities were greater.

The evaluation uncovered a number of relatively anecdotal but significant types of added value related to HRBA: In Somalia, interviewees with GAVO highlighted how working with girls with disabilities has provided a basis for building their self-esteem, confidence that has, in turn, helped them to start businesses and seek out employment. Examples are acknowledged as small but indicative of the possibilities of achieving broader human rights outcomes from more modest livelihood

efforts. Related to self-esteem, dignity was raised as an important HRBA-related objective in one interview, referring to the right to privacy for women with disabilities accessing health services. Convincing parents not to hide their children with disabilities was stressed by one interviewee. The importance of SRHR for women with disabilities was described as essential in order to confront service providers who otherwise only recommend sterilisation or even conduct operations without informing women what was being done. GAVO has also been successful in creating recognition of mental health care as a need in Somalia associated with the trauma from the conflict. This has involved both advocacy to authorities who have developed a strategy and creating a department to deal with these non-visible disabilities. It has also involved fighting stigma. They acknowledge that progress has been incremental at best.

Examples such as these illustrate the diversity of how transformation is being pursued. One of the most striking sets of interventions is those that have introduced sign language in countries where this was totally absent before, as described in the following example:

Box 9. Sign language, dignity for transformation

Sign language, dignity for transformation

A transformational aspect of dignity that has been supported in the work of FLOM and DPF partner, Tegsh Tusgal, has been that of introducing and strengthening rights holders' and duty bearers' capacities to use sign language. This has been described as providing the basis for a fundamental shift in becoming able to communicate and thus participate in society among a sector of the population that had been severely excluded in the past. This example of working towards linguistic rights and cultural identity has been such a clear and momentous change for those benefiting that it may be one of the clearest examples of transformation encountered. The extent to which duty bearers have embraced (and financed) their responsibilities in terms of ensuring that translators are available as requires remains uncertain, but significant results have been achieved in acknowledgement of these responsibilities in legislation and to some extent in practice. This has been particularly notable in Mongolia, where due to the legacy of the past communist system, duty bearers' understanding of accountability is still not well established.

Finding 11: Operationalising the CPRD is central to HRBA in disability efforts, and Finnish support has contributed to notable results, even though full recognition/understanding of the implications of CPRD compliance is still limited among many partners.

An important area of added value that perhaps receives sub-optimal attention is that of adherence to the CPRD. There is a fairly consistent reference to CRPD in most intervention documents reviewed. DPF reports significant progress in engaging its partners in CPRD monitoring processes, with 72% of partners participating in national monitoring or parallel processes (DPF, 2022). Abilis also reports widespread awareness of CPRD among its partners.

Nonetheless, the specifics of how the convention is followed are mentioned in only a minority of the intervention documents and interviews. This can be interpreted to suggest that HRBA has primarily added value in introducing an awareness of the importance of overall human rights norms in disability initiatives. PSR describes how CPRD has influenced Kenyan national disability and health policies. However, in most cases, recognition of the importance of CPRD has not led to critical analyses of how this should guide their work towards more progressive intentions.

It is acknowledged as an incremental process, though. One partner stressed how they integrate awareness of CPRD and rights more generally into their livelihoods support, but that the starting point is very basic.

An issue related to CPRD monitoring that was rarely raised in interviews was disability data, which would seem essential for demands for accountability and transparency. Only one interviewee raised this and then highlighted how there was a lack of direction on what data was needed and how it would be used. This may relate to the scope of the sample as perhaps other agencies (particularly UNICEF) may be receiving greater support for this. It can be assumed that agencies working more with duty-bearers may be engaged in data collection. Indeed, as part of its mandate to act as a custodian within the UN system of the CPRD, UNPRPD has been very active in working with other UN agencies to address data gaps.

Finding 12: Disability efforts supported by Finland gives significantly greater attention to strengthening rights-holder capacities than duty-bearer capacities and accountabilities –but entry points exist for redressing this imbalance.

HRBA has generally contributed to raising awareness among CSO partners of the importance of accountability and transparency of duty-bearers, but the primary focus is on rights-holder capacities. Abilis and its partners explicitly focus more on rights-holder capacities, whereas DPF applies somewhat more attention to duty-bearers. UNPRPD works through UN channels and therefore leans more towards duty-bearers. They report significant results regarding duty-bearers capacities and changes in laws, policies and strategies. UNPRPD undertakes extraordinary quantities of training, mostly for and in cooperation with other UN agencies. Despite their duty-bearer emphasis, UNPRPD reporting strongly emphasises the involvement of OPDs as a basis for including the voices of persons with disabilities. They report having a nudging and reminding role in this regard vis-à-vis the UN agencies they accompany in their work. For example, in 2020, they reported having engaged with 273 OPDs (UNPRPD, 2021).

Many partners have had difficulties in finding entry points to work with duty-bearers. One acknowledged, for example, that influencing duty-bearers via engagements with the World Bank was potentially important but that they were unaware of how to engage. Where support to duty-bearers has been achieved by partners focused on service provision, it has tended to emphasise the skills of local authorities. Outcomes are, therefore, uncertain regarding transformations in systems of accountability or sustainable inclusion efforts. For example, in Somali health service efforts, GAVO has been able to provide some training to government staff, but informants acknowledge not having the leverage to engage sufficiently closely with the Ministry of Health to gauge if and how this training has led to changes in practice.

Some of the support to duty-bearers is about providing minimal skills and awareness to enable certain services to reflect inclusion principles. This is exemplified by training in sign language and the development of systems to ensure the availability of sign language interpreters, such as the case of the work of FLOM and the Finnish Association of the Deaf (a DPF partner).

The lack of entry points to engage with duty-bearers is aggravated in conflict settings where the legitimacy and accountability of duty-bearers may be weak and where humanitarian (needs-based) norms prevail. In Syria, UNICEF's opportunities to work towards accountability from duty-bearers providing services for children with disabilities are virtually non-existent, despite the systemic breakdown that cannot be remedied by small CSO interventions. Initial MFA assessment of this intervention suggested that this was a nexus initiative, but later MFA observations explicitly

recognised that a triple nexus does not exist in Syrian development cooperation plans. Interviewees acknowledge that the prospects for applying HRBA in service provision are minimal. Some admit that HRBA provides no added value. It is thus striking that these concerns were clearly described in MFA comments but that decisions were nonetheless made to proceed due to an understanding that this was a de facto humanitarian intervention, I.e., addressing the needs of children with disabilities rather than their rights. There is no rights-holder participation and no significant attempt to influence duty-bearers. Initial MFA classification of the project as being progressive was debunked, with calls for it to be shifted to sensitive.

In UNFPA's project in Iraq, there have been no such restrictions and the project has been designed with active efforts to encourage ownership by government authorities. From interviews and reporting it appears that some progress is being made with engaging local (governate) authorities, who are described as expressing pride in the intervention. Some tools have been promoted at the national level, including a set of standard operating procedures for youth centres. Results in terms of uptake of this capacity support to duty-bearers, as well as general intentions to encourage replication of the models developed, appear to be limited thus far (UNFPA, 2022).

In some interviews, it was noted that there are general blockages in efforts to demand accountability and achieve transformational status when authorities claim to support initiatives but fail to take on responsibilities for financing. UNPRPD works specifically on this in relation to what is referred to as "CPRD-compliant budgeting and financial management" (Annual narrative and financial report 2021). The UNFPA project in Iraq is an example of where this is a significant concern about this moving forward. In education, more generally, it was noted that some authorities view disability-inclusive education as 'too expensive'. This is most pronounced in conflict-affected contexts where financial pressures are particularly great.

One interviewee stressed that their advocacy work focused on the gap between legislation related to protecting disability rights and the actual implementation of these laws. It is notable that this was not raised often, perhaps indicating the micro-level focus of most projects that may not include tools to enhance this higher-level accountability. Some partners take a strict stance in demanding accountability for financing services, such as the Finnish Association of the Deaf, which works with developing sign language and systems for the provision of interpreters but does not provide funding for the actual costs of the interpreters themselves, as that is seen as a duty-bearer responsibility.

An important caveat in drawing conclusions about added value is to note that although partners may be 'doing' relatively transformational activities and achieving modest but valued results, they may lack appropriate skills to explain achievements at systems levels. Reporting remains focused on activities and outputs, i.e., services provided to persons with disabilities. Whether or not this reflects a misunderstanding of donor requirements is unclear, but there is a prevailing assumption that reporting should focus on activities and outputs, and this represents a disincentive for a shift to pursuing more ambitious HRBA outcomes.

3.4 Findings regarding risk management

Finding 13: Risk management is generally not a major concern for organisations working with disability.

Few findings were encountered regarding the integration of risk management into disability intervention plans. Interviewees for this case study were generally perplexed when asked about how they approach risk management. If they had adopted standard risk management operating procedures, these were mentioned, but such procedures were generally not related to HRBA or adapted to risks arising in disability efforts per se. For example, some interviewees mentioned sexual harassment guidelines, but there was little explicit mention of direct implications for HRBA or intersectionality between disability and gender-based violence. In an exception to this, MFA comments to PSR on their work in Kenya emphasise the importance of analysing how to strengthen the awareness of local authorities to SRHR given the risks of engaging in sensitive topics. The PSR partner, Women Challenged to Challenge, focuses directly on these issues.

An acknowledged risk related to disability (though not generally labelled as a 'risk') has been that of exclusion. Those with intellectual disabilities and deaf-blind were sometimes mentioned as being difficult to include in both project plans and in society more generally. Sometimes exclusion risks were associated with the capacities of staff to undertake sufficient outreach or adapt services. UNFPA Iraq, for example, was challenged in supporting inclusive efforts in the post-conflict Mosul context and amid apparent human resource deficits.

As emphasised above, the extent to which local partners, even OPDs, have fully embraced HRBA is mixed, and some retain a charity orientation. This creates risks of development efforts reproducing these approaches. One interviewee mentioned an example of a partner inappropriately bringing in persons with disabilities to show them off to the donor, i.e., what they perceived to be a non-dignified "freak show". The Finnish partner responded strongly and used this as an example of what needs to be changed.

Finding 14: Some partners are recognising that the psychosocial health of their staff and the rights-holders with whom they work is a factor that should be addressed, particularly as interventions are expanded in conflict-affected countries.

Negative effects on mental health are sometimes mentioned in disability projects in relation to the stress associated with COVID. Partners are aware that such stress affects their partner staff as well as rights-holders more generally. Evidence of general procedures to manage risks of increasing these risks is very limited, but one notable example was encountered in Abilis' response to the conflict in Ethiopia, where the need to invest in linking OPDs to more powerful humanitarian and development agencies.

Indirectly related to this, Abilis has proposed a specific thematic initiative to run during the period of 2022-2025 for working with Finnish experts in emergency management and disaster risk reduction to strengthen the resilience of both persons with disabilities and OPDs operating in conflicts and facing natural hazards. UNPRPD also has a proposal to work with the Ukraine response (on a multi-country basis, including Moldova and Georgia) that takes into account conflict risks and applies a comprehensive *do no harm* perspective encompassing partners.

Finding 15: A major 'risk' is that of designing interventions that have poor prospects of being scaled up and that, therefore, may become mere islands of success that distract attention from the need for broader systemic impacts.

Another risk that was frequently noted was that of creating islands of success amid overwhelmingly negative contexts. It was sometimes noted that Finland's cooperation was seen as unique and important but provided limited opportunities to diffuse lessons among other donors who do not prioritise disability as a human rights issue and feel that "it is nice that Finland does this".

The 'islands of success' factor is particularly acute with regard to UNICEF's work in Syria due to the sanctions that block any efforts to the engagement with duty-bearers that would be required to scale up or scale out the interventions. In order to follow the sanctions regime, UNICEF can only support CSO service providers and cannot rebuild systems. As such, the outcomes of their support may be essential to keep a modicum of services in place, but these services are inevitably fragmentary and limited, temporally and in scope. One informant described these frustrations:

> *"When I advocate changing donor modalities, there is no point in arguing that children have rights since nobody listens. Although UNICEF has a mandate to ensure the rights are recognised in reality, it is access in emergency. Not about rights. Development is not supposed to happen in Syria. Not if everything has to go thru the 20-30 NGOs in the country. Nexus is forbidden. Donors see what we are doing but in the European capitals they are not allowing development."*

It was also acknowledged that support provided may do harm if, for example, heavy investments in non-formal education due to sanctions effectively undermine the credibility and trust in formal public schools and perhaps even generates envy and conflict. More generally, given the extent to which development cooperation emphasises strengthening the capacity of rights-holders, as opposed to duty-bearers, this may also contribute to raising demands and expectations but doing less to support duty-bearers to shoulder responsibilities. Small islands of success may further weaken the legitimacy of duty-bearers.

Another risk of irrelevance due to the small scale of resources was noted regarding UNPRPD's limited leverage in influencing much larger UN agencies. Some of these partners embraced the opportunities and took advantage of UNPRPD's capacities to make their work more disability compliant. However, other UN agencies were said to frequently prioritise devoting planning resources to bigger intervention areas where investing 'seed money' held opportunities to access large projects in the future. Human rights obligations were acknowledged to be a weak argument for engaging in disability efforts in the face of the *realpolitik* of UN decision-making.

There are some positive results reported, despite a generally bleak landscape. One interviewee noted that being able to invest in the systems needed for a HRBA was reliant on stable funding. Even though Finland provides short-term funding, it was considered far more stable than other development partners, and this reliability made it possible to take the risk of investing in systems. The same interviewee acknowledged that an aspect of continuity they had little control over was changes in local government, as an understanding of the importance of disability rights needs to be redeveloped after every change in government.

A final factor of note related to the issues around islands of success is that of prevailing biases towards high profile, larger, formal (usually male-led) OPDs when it may be more effective to engage with smaller and less eloquent groups that lack the capacity to use HRBA jargon. Finland's

strong CSO architecture and the UNPRPD are aware of these risks and working very actively to overcome them. They report being conscious though of the pressures in development efforts to professionalise and ensure high-quality reporting, which makes these efforts increasingly difficult.

Finding 16: Do no harm commitments receive relatively little attention since disability efforts are seen to be a 'good thing' –but harm in relation to feeding competition and fragmentation in the OPD landscape has been noted in some instances as a potentially problematic outcome of aid investments.

A risk that was noted on a few occasions was that of the injection of outside resources generating jealousy among small and fragmented OPDs. UNPRPD mentions having a role in guiding their UN colleagues in working within these sensitive institutional landscapes. This factor initially created conflicts (and perhaps weakened rights-holder voice) among competing OPDs in Mongolia, a concern that was subsequently overcome through careful dialogue. Other interviewees stated that the level of resources was small and thus not enough to trigger such zero-sum thinking. The evaluation team notes that the nature of the disability community in many countries, with a multitude of small organisations, implies that this is a risk worth monitoring, but also that the existence of experienced partners, such as Abilis and DPF, with insight into these dynamics is important for managing these risks.

A final overarching note regarding why risk is largely ignored in disability interventions is that disability is seen as a human rights relevant 'good thing', by definition, which greatly mitigates risks of doing harm. It is relatively non-threatening to duty-bearers (compared to other HRBA efforts), particularly when framed as social welfare. Perhaps because of this, mention of *do no harm* analyses is rare, and when described, they appear superficial at best. Indeed, the non-controversial nature of disability rights also has been noted as a risk reduction factor in itself. One interviewee stated:

> *"Interesting how disability rights are seen in contexts where human rights are not on the agenda, but where we see that disability is considered neutral and thus a good entry point to bring up women's rights. Years ago, the special representative went to North Korea and we had discussions about disability rights as an entry to discuss human rights. We carried out training, etc. (stopped by COVID). Small example but shows potential catalytic role. Disability rights can be a convening focus in sensitive contexts. CPRD is more advanced in SRHR than through other conventions because we are not seen as a threat."*

4 Conclusions

Finland's disability-related development cooperation, especially when it is in the form of targeted actions, is a showcase of what HRBA means in development cooperation, together with a demonstration of normative commitments (see findings 1, 2, 7). It is a source of pride among partners and within the MFA. This pride is, in many cases, a driver for raising ambitions, particularly as it is an area where the charity approaches of HRBA-sensitive efforts are in stark contrast to what is needed in terms of progressive and transformative efforts. Being a showcase has encouraged higher ambitions in the MFA itself as it is apparent that there has been an active learning process among the MFA and its CSO partners about what HRBA means for disability efforts. Goals are shared, and there is a good degree of consensus on the way forward.

Nonetheless, these ambitions are not always apparent. **As a CCO, disability can also provide a basis for achieving a modicum of recognised, visible HRBA results without broader commitments to systemic change or increasing the power of persons with disabilities and their OPDs (see findings 3, 5).** This is not how the differentiation between HRBA and CCOs was intended, but reflects a not insignificant proportion of praxis in disability-related development cooperation.

Due to this 'continuum' of ambitions, in a significant proportion of interventions, there is no clear differentiation between addressing disability from a HRBA sensitive orientation and pursuing it as a CCO. Given that it is apparent that a project can be classified as sensitive even if it is approached as a CCO, there is no indication that most partners perceive this to be a problem. This relates to prevailing ambiguity (despite guidance documents) about what HRBA and CCOs mean for partners. An overall conclusion of this case study is that, **sometimes, limited HRBA is 'okay' –given the massive service provision needs, i.e., humanitarian norms may be valid in responding to the chronic disaster facing persons with disabilities (see findings 2, 9).**

Related to this 'realist' take on the depth of application of HRBA, one Finnish interviewee stated that her impression was the HRBA began as a "planning tool" and has evolved into more of a "well-meaning attitude". She noted that "We organise OPDs and work with persons with disabilities as the basis for HRBA, i.e., rights-holder voice. Always an assumption that it is thus HRBA, but we should analyse this assumption." **Despite the elements being in place to leverage the credibility that disability interventions generate, and the positioning for broader human rights commitments, little evidence exists that this automatically (or frequently) leads to transformation (see findings 1, 4, 5, 11).** There are different factors in this, not all of which are within Finland's capacity to influence. Finland is largely alone amid massive human rights deficits, and it is unrealistic to expect widespread structural achievements.

Furthermore, the **ambitions of the disability showcase have not been replicated in relation to other aspects of discrimination, with the notable exception of the focus on women and girls (see findings 2, 7, 11).** There is little apparent effort to transfer the lessons of this success story into other areas where prevailing discrimination calls for strengthened HRBA. For example, it is not apparent that the power of the ecosystem surrounding disability-related development cooperation is being replicated, with normative partners in place to lead and develop the capacity of partners. There is strikingly little attention to either replication of this 'model' in addressing, e.g.,

ethnic discrimination or using the model as an entry point to probe how to address intersectional discrimination. These are missed opportunities.

One of the strongest features of HRBA in disability efforts is the strength (albeit not universal) of **commitments to undertake 'nothing about us without us' by engaging OPDs as a central principle within HRBA commitments to participation and rights-holder voice (see findings 1, 12)**. However, the interventions analysed have **less emphasis on duty-bearer capacity development, which may lead to raised expectations if states fail to shoulder their responsibilities (see finding 12).**

In sum, strong partners and political support are preconditions to achieving HRBA outcomes and moving beyond superficial approaches. But they are not guarantees –charity and medical mindsets are deep-seated, and structures of support reflect a prevailing emphasis on needs-based results (see findings 1, 3, 11).

5   Lessons learnt

Disability is clearly a flagship of Finland's commitment to HRBA. Pride in this experience is justified, and this pride can be an important driver to leverage proof of the HRBA concept to raise ambitions. However, the lack of diffusion of lessons can also be seen as indicating that this success story may also be an 'exception that proves the rule'. **The MFA should learn from disability experience to actively ensure that HRBA is recognised as more than a 'well-meaning attitude' and explore ways to leverage aspects of the successful 'architecture' of Finnish HRBA promotion in disability efforts into other areas of cooperation.** This may include responding to other targets of discrimination and also intersectional facets of discrimination.

This may include more intentional engagement with conceptually well-anchored CSOs and normative components of the UN system, especially in coaching roles. They should drive the replication and lessons learning process, and MFA should devote commitment and resources to enable them to do so. This is about knowing how (and recognising the obstacles) to become more transformational.

The MFA should use this success story proactively to look for ways to enable partners to use the Finnish experience to demonstrate the 'nuts and bolts' of moving towards transformational HRBA based on the experience with disability-related development cooperation. This may also include efforts to influence the broader donor community and duty-bearers and help them to recognise these responsibilities.

Latent potential exists to better leverage cross-learning from Finland's portfolio if information consistently showcases transformational HRBA outcomes (rather than service provision activities and outputs). This could support partners in making informed decisions about whether to shoulder the risks of more ambitious efforts. This also relates to the need to better clarify (and invest in skills for) reporting related to influencing the systems that must change to move towards more transformational outcomes.

The largely successful adherence to 'nothing about us without us' within disability-related development cooperation bears lessons for overcoming discrimination more generally by critically reflecting on who represents rights-holders. There is room to explore how and why this has come into focus and how it has generated credibility and evidence about the importance of this ownership and leadership. This relates to the ongoing discourse around decolonising aid.

Nonetheless, the MFA should not overplay these successes – **HRBA-sensitive service provision and livelihood roles remain relevant, even if they are not transformational.** This is particularly true in conflict contexts where opportunities to advocate towards and engage with duty-bearers are limited, and there is little likelihood of states making needed investments to address the rights of persons with disabilities.

Investments may be encouraged by filling some of the gaps in the disability interventions –most notably regarding data. A focus on data can force stakeholders to confront the enormity and severity of the problem. It is also about using data to set CRPD-aligned results indicators and thereby underpin much-needed transparency. Given the presence of strong, experienced and

outspoken OPDs in Finland, it also makes sense that these organisations be invited to help define indicators for disability awareness and disability-sensitive plans. This could then be shared with others, for example, in the UN system via engagements with UNPRPD.

Finally, MFA should be vigilant to ensure that the experience that is emerging from disability efforts is brought together to enable joint learning and coordination. **Given the imbalance that exists within CSO efforts focused on rights-holders (rather than duty-bearers), support to greater interaction between UNPRPD and the Finnish CSO partners would be particularly valuable.**

References

About Safetag. (n.d.). Safetag. https://safetag.org

African Development Bank Group. (2023). *Updated Integrated Safeguards System*.

Civicus. (n.d.). *Mozambique*. Country/Mozambique/. https://monitor.civicus.org/country/mozambique/

Civicus. (2023). *Monitor.civicus.org/country/tanzania/*. Monitor.Civicus.Org/Country/Tanzania/. https://monitor.civicus.org/country/tanzania/

Clubofmozambique.com. (2022, December 16). *Mozambique: Assembly passes bill to legalise "local forces*. https://clubofmozambique.com/news/mozambique-assembly-passes-bill-to-legalise-local-forces-aim-report-230674/

Collaborative Centre for Gender and Development. (2022). *Evaluation of the Finnish Fund for Local Cooperation (FLC) funded Women Peace and Security Projects*.

Development Policy Committee. (2021). *Greater than the sum of its parts: Why is a triple nexus approach needed for Finaland's development cooperation, humanitarian assistance and peace actions?* Development Policy Committee.

Development Policy Committee. (2023). *A Human Rights-Based Approach to Finnish Development Policy: Tense times demand a more ambitious direction, Development Policy Committee Publications 2023:1.* (2023:1; Development Policy Committee Publications). Development Policy Committee.

DPF. (2022). *Programme Results Report 2021: Development Cooperation Programme Disability Partnership Finland*.

Euro Child. (2022). *Countering Anti-Child Rights Movements in Europe: The Need for a European Mechanism*.

European Union. (2016). *EU Guidelines on Human Rights Defenders*.

FCG. (2021). *Mid Term Review, Accelerated Growth for Micro, Small and Medium-Sized Enterprises in Zambia Programme*.

Finnfund. (2023). *Human rights management system—Our work in practice*. Finnfund. https://www.finnfund.fi/en/impact/corporate-responsibility/human-rights/human-rights-management-system-our-work-in-practice/

Freedom House. (2023a). *Freedom in the World 2023*. Https://Freedomhouse.Org/Search?Key=tanzania. https://freedomhouse.org/search?key=tanzania

Freedom House. (2023b). *Freedom in the World Mozambique*. https://freedomhouse.org/search?key=mozambique

Green Climate Fund. (2022). *GCF Handbook, Decisions, policies, and frameworks. As agreed by the Board of the Green Climate FUnd from B.01 to B.30*. Green Climate Fund.

HRBA portal. (2022). *HRBA Portal. A Human Rights-Based Approach to Programming. What value does a human rights-based approach add to development? Https://hrbaportal.org/faq/what-value-does-a-human-rights-based-approach-add-to-development/HR*. Https://Hrbaportal.Org/Faq/ What-Value-Does-a-Human-Rights-Based-Approach-Add-to-Development/HR.

Human Rights Watch. (2023, February 10). *Mozambique: Draft Law Threatens Civil Society Groups*. Https://Www.Hrw.Org/News/2023/02/10/Mozambique-Draft-Law-Threatens-Civil-Society-Groups. https://www.hrw.org/news/2023/02/10/mozambique-draft-law-threatens-civil-society-groups

ILO, & IFC. (2021). *Better Work Vietnam Annual Report 2020*.

IPI. (n.d.). *Mozambique lawmakers should reject restrictive NGO law*. Ipi.Media/Mozambique-Lawmakers-Should-Reject-Restrictive-Ngo-Law/. https://ipi.media/mozambique-lawmakers-should-reject-restrictive-ngo-law/

Kirkemann Boesen, J., & Martin, T. (2007). *Applying a rights-based approach. An inspirational guide for civil society.* The Danish Institute for Human Rights.

Kluyskens, J., & Holmberg, A. (2023). *Evaluation of MSI Reproductive Choices Afghanistan, with a focus on the project funded by Sweden*. Sida.

Knuckey S. and Satterthwaite M. (2021). Should Human Rights Practice Be Rights Based? In *The Struggle for Human Rights: Essays in Honour of Philip Alston*. Oxford University Press.

Kontinen, T., & Nguyahambi, A. M. (2023). Negotiating CSO Legitimacy in Tanzanian Civic Space. *Civil Society Responses to Changing Civic Spaces, K. Biekart et al. (Eds.),*.

Mallimbo, P. (n.d.). *272 journalists suffer press violation*. Media Council of Tanzania. https://mct.or.tz/wpfd2023/

MFA. (n.d.). *Finland's Development Policy and Development Cooperation in Fragile States – Guidelines for Strengthening Implementation of Development Cooperation*.

MFA. (2015). *Human Rights Based Approach in Finland's Development Cooperation Guidance note*. MFA.

MFA. (2018a). *Manual for bilateral programmes*.

MFA. (2018b). *The Finnish Approach to Addressing the Rights of Persons with Disabilities in the Development Cooperation and Policy*. MFA.

MFA. (2021a). *Country programme for development cooperation—Tanzania 2021–2024*.

MFA. (2021b). *Finland's country strategy for Kenya 2021–2024*. MFA.

MFA. (2021c). *Finlands country strategy for Mozambique*. Ministry for Foreign Affairs of Finland.

MFA. (2021d). *Institutional Cooperation Instrument—ICI Manual, Version 8*.

MFA. (2021e). *Report on Development Policy Across Parliamentary Terms*.

MFA. (2022a). *Finland's Development Policy Results Report 2022*.

MFA. (2022b). *The triple nexus and cooperation with fragile states and regions*. Ministry for Foreign Affairs of Finland.

Ministry for Foreign Affairs of Finland. (2022). *Supporting Human Rights Defenders Together: Guidelines of the Finnish Foreign Service.*

Norwegian Refugee Council. (2021). *Final Report: Prevention of the forcible transfer of Palestinians in the West Bank and East Jerusalem through humanitarian assistance and evidence-based advocacy.*

Nyeko, O. (2023, January 9). *Tanzania-ends-ban-political-rallies*. Tanzania Ends Ban on Political Rallies. https://www.hrw.org/news/2023/01/09/tanzania-ends-ban-political-rallies

OECD. (n.d.). *Innovation for Development Impact: Lessons from the OECD Development Assistance Committee*. OECD iLibrary. https://www.oecd-ilibrary.org/sites/ecab3502-en/index.html?itemId=/content/component/ecab3502-en

OHCHR. (2022). *Universal Periodic Review—United Republic of Tanzania*. Universal Periodic Review - United Republic of Tanzania. https://www.ohchr.org/en/hr-bodies/upr/tz-index

Ombok, E. (2023, March 2). *Kenyan President Bashes Supreme Court's Pro-LGBTQ Ruling*. Https://Www.Bloomberg.Com/News/Articles/2023-03-02/Kenyan-President-Bashes-Supreme-Court-s-pro-Lgbtq-Ruling#xj4y7vzkg. www.bloomberg.com/news/articles/2023-03-02/kenyan-president-bashes-supreme-court-s-pro-lgbtq-ruling#xj4y7vzkg,

OSCE Office of Democratic Institutions and Human Rights. (2014). *Guidelines on the Protection of Human Rights Defenders.*

Palenberg, M., Katila, M., Dixon, V., Tyrrell, T., Mikkolainen, P., & Frestadius, S. (2020). *EVALUATION OF FINNISH DEVELOPMENT POLICY INFLUENCING ACTIVITIES IN MULTILATERAL ORGANISATIONS* (2020/3A; Evaluation on Finland's Development Policy and Cooperation). Ministry for Foreign Affairs of Finland.

Plan International. (2021). *Programme Document—My Body My Future II - Programme of Plan International Finland 2022-2025*.

Plan International Finland. (2021). *My Body My Future 2018-2021*. Plan International Finland.

Powys Maurice, E. (2021, March 18). *John-magufuli-president-tanzania-dead-covid-lgbt-legacy-homophobia-hiv-aids-gay*. Thepinknews.Com.

Remme, H., Kingazi, S., Mesiäislehto, V., Isaac, M., & Mbwana, E. (2022). *Socio-Economic Assessment Poverty, Vulnerability, Gender & Community Based Forest Management supported by FORVAC*.

Remme, H., Lukumbuzya, K., Malugu, I., & Mäkelä, M. (2022). *External Review and Evaluation Services of Forestry Programmes in Tanzania, 2021-2023 Report of Programmes Assessments 2022: Mid-Term Evaluation PFP2 and annual reviews of FORVAC and TOSP*. Particip niras.

Sandouka, M., Freij, N. (2018). *External Evaluation of the West Bank Protection Consortiu, 2015-2017*.

Tertium Oy. (2019). *Internal Mid-Term Evaluation, Spirework Zambia-Finland Project, Social Protection for Informal and Rural Economy Workers*.

Tharoor, I. (2023, March 31). Under Biden U.S. sees unions as key ally in democracy agenda. *The Washington Post*.

The Citizen. (2019, June 28). *It is no longer a crime to publish statistics in Tanzania*. https://www.thecitizen.co.tz/tanzania/news/national/it-is-no-longer-a-crime-to-publish-statistics-in-tanzania--2685534

Türk V. (2023). *Annual Report and Oral Update by the High Commissioner for Human Rights on the activities of his Office and recent human rights developments. 52nd session of the UN Human Rights Council*.

Twaweza. (2021). *Annual report 2021*.

UN Somalia Joint Fund. (2022). *UNFPA Country Programme 2021-2025*.

UN Women. (2022). *Report of the Under-Secretary-General/Executive Director of the United Nations Entity for Gender Equality and the Empowerment of Women on progress made on the Strategic Plan 2018–2021*.

UNDP. (2023). *Multidimensional Poverty Index 2023, Briefing note for countries on the 2023 Multidimensional Poverty Index, Zambia*. UNDP.

Unesco. (n.d.). *Revision civil societies law*. Policy Monitoring Platform. https://es.unesco.org/creativity/policy-monitoring-platform/revision-civil-societies-law,

UNFPA. (2021). *Chaguo Langu Haki Yangu 'My Rights My Choices' Protecting the Rights and Choices of Women and Girls, particularly Women and Girls with Disabilities in Tanzania*.

UNFPA. (2022). *Progress report: Empowering adolescents with disabilities through education and civic engagement programmes in Ninewa Governate*.

UNICEF. (2022). *UNICEF Strategic Plan 2022-2025, Renewed ambition towards 2030*. UNICEF.

UNICEF, & MFA. (2021). *Policy guidance on AI for children, 2.0*.

United Nations Human Rights. (n.d.). *Report to the Government of Finland: OHCHR's Work on Women's Human Rights and Gender Equality,January – December 2022*. United Nations Human Rights.

UNPRPD. (2021). *Annual Narrative and Financial Report 2020 UNPRPD*.

van Gerwen, H., Nguyen, H. T., Laaksonen, S., Tung, P. D., & Kontro, M. (2021). *Evaluation on the Transition Process of Finnish-Vietnamese Cooperation in 2008-2020, Volume 1 Main Report* (Evaluation on Finland's Development Policy and Cooperation 2021/5A).

Wells, T. (2023, February 13). The rise and fall of innovation labs in the aid sector. *Devpolicy-blog*. https://devpolicy.org/the-rise-and-fall-of-innovation-labs-in-the-aid-sector-20230213/

Winniecki, E. (2021). *Gender and Technology: How non-governmental organizations and civil society actors are harnessing technology to promote gender equality.*

World Population Review. (2022). *Worldpopulationreview.com/country-rankings/hdi-by-country*. HDI 2022. https://worldpopulationreview.com/country-rankings/hdi-by-country

Intervention-related documents

The document review included intervention-specific documents of the sample interventions. The list of sample interventions is in **Annex 1**. The types of documents reviewed included, among others, the following (as available/relevant):

- programme documents,

- results framemworks,

- quality group documents (funding proposals, meeting notes, advisor reports to the quality group),

- relevant strategies and studies conducted (e.g. human rights assessments; GESI strategy; background analysis for project document),

- annual reports and workplans,

- completion reports,

- mid-term reviews/evaluations,

- desk officer's mission reports,

- partnership agreements,

- guidelines for dialogue with programme stakeholder,

- minutes from annual or other meetings with project partners.

Annex 1

Case study names: Longterm partnerships = HRBA in the context of long-term partnerships; Transition = HRBA in transition contexts; Conflict = HRBA in conflict context; Innovations = Innovations and trends towards transformational programming; Multilaterals = HRBA in partnering with multilaterals, where MFA influence is more limited; Headwinds = HRBA in severe headwinds; CCO = From cross-cutting objectives to HRBA, lessons from disability in development cooperation

INSTRUMENT/MODALITY	INTERVENTION NAME	COUNTRY	IMPLEMENTED BY	CASE
Bilateral	Forestry and Value Chains Development FORVAC	Tanzania	FCG International Ltd	Long-term partnerships
Bilateral	Elections and human rights in Tanzania 2019–2021./ Core support to LHRC	Tanzania	LHRC	Long-term partnerships
Bilateral	Strengthening accountability	Tanzania	Twaweza East Africa	Long-term partnerships
Bilateral	Accelerated Growth for Micro, Small and Medium-Sized Enterprises in Zambia (AGS) Programme	Zambia	AGS Team (Niras), in partnership with Ministry for Small and Medium Enterprise Development (MSMED)	Transition
Bilateral	Integrated Reproductive and Maternal Health Programme Phase VII (2018-2020)	Afghanistan	Marie Stopes International Reproductive Choices Afghanistan (MSIA)	Headwinds
Country programming	Country programme for development cooperation - Kenya 2021–2024	Kenya	MFA	Transition
Country programming	Country Programme for Development Cooperation - Mozambique 2021-2024	Mozambique	MFA	Long-term partnerships
Country programming	Country programme for development cooperation - Palestine 2021–2024	Palestine	MFA	
Country programming	Country programme for development cooperation - Somalia 2021–2024	Somalia	MFA	
Country programming	Country programme for development cooperation - Tanzania 2021–2024	Tanzania	MFA	Long-term partnerships
CSO	Empowered Girls Speak Out - Securing education of girls through sports in secondary schools and vocational.	Tanzania	Liike ry/SDA	Long-term partnerships
CSO	Empowering the Boys' Societies Through Sports and Health Education	Tanzania	Liikunnan kehitysyhteistyö Liike ry/SDA	Long-term partnerships
CSO	Youth Agency in Mufindi	Tanzania	Deaconess Institute in Helsinki/FCWC	Long-term partnerships

INSTRUMENT/MODALITY	INTERVENTION NAME	COUNTRY	IMPLEMENTED BY	CASE
CSO	Vutomi - My Life, a project part of My Body My Future	Mozambique	Plan International Finland Plan Mozambique /Associação Mahlahle	Long-term partnerships
CSO	Community strategies for climate-resilient livelihood	Zambia	Green Living Movement Suomi ry with Green Living Movement Zambia and Young Women's Christian Association (YWCA) Zambia	Transition
CSO	International Planned Parenthood Federation (IPPF): Core Funding 2021-2022	Global	IPPF	Innovations
CSO	DefendDefenders Protecting Democratic and Civic Space for Human Rights Defenders	East and Horn of Africa	Defend Defenders	Innovations
CSO	Finnish Evangelical Lutheran Mission (Felm) Development Cooperation Programme 2022-2025	Multi-country	Felm	Innovations
CSO	From Disparity to Dignity: Realizing Indigenous & Minority Rights in Development	Global and multi-country	Minority Rights Group International	Innovations
CSO	Promoting People's Right to Information and Freedom of Expression with Free and Pluralistic Media: Vikes Development Programme 2022-2025	Multi-country	Vikes	Innovations
CSO	Preventing sexual and gender-based violence in Malawi	Malawi	Väestöliitto	Innovations
CSO	Beyond Inclusion: A human rights-based approach to access services	Kenya	KIOS Foundation (KIOS)/partner 1	Headwinds
CSO	Enhancing Access to Justice for Sexual & Gender Minorities in Kenya	Kenya	KIOS/partner 2	Headwinds
CSO	Yene Raey 2 - My Body My Future January 2022–December 2025	Ethiopia	Plan International Finland/Ethiopia	Headwinds
CSO	The Network for Religious and Traditional Peacemakers Core Support, Global Program 2021-2024 and Annual Plan 2021	Global	FCA/The Network for Religious and Traditional Peacemakers (NRTP)	Headwinds
CSO	Disability Partnership Finland Development Cooperation Programme 2022-2025	global	DPF	Disability
CSO	Abilis Foundation Global Programme 2022-2025	global	Abilis	Disability
CSO	Promoting Sexual and Reproductive Health of Women and Girls with Disabilities in Kenyan Health Services	Kenya	Physicians for Social Responsibility Finland	Disability
CSO	Mongolian deaf community's linguistic identity empowerment	Mongolia	Lähetysyhdistys Kylväjä ry/ Finnish Lutheran Overseas Mission (FLOM)	Disability

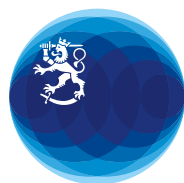| INSTRUMENT/MODALITY	INTERVENTION NAME	COUNTRY	IMPLEMENTED BY	CASE
CSO	Unlocking doors to basic health and education for children with Sensory disabilities in Bara and Parsa districts of Nepal	Nepal	Physicians for Social Responsibility Finland	Disability
CSO	Women Challenged to Challenge	Kenya	Physicians for Social Responsibility Finland (PSR)	Disability
CSO	Kenyan Association for the Intellectually Handicapped	Kenya	Disability Partnership Finland (also support from Abilis)	Disability
CSO	Sustainable livelihoods for vulnerable children and youth in Tanzania	Tanzania	Finlands Svenska Pingstmission	Disability
CSO	West Bank Protection Consortium	Palestine	Norwegian Refugee Council (NRC)	Conflict
CSO	Contributing towards peace and justice through promoted resilience and livelihoods of women and young people in West Bank	Palestine	Finnish YMCA	Conflict
CSO	Support to implementation of National Reconciliation Framework	Somalia	Finn Church Aid (FCA)	Conflict
CSO	Daryeel Mobile Health Clinic Project in Afmadow town in Jubaland, Somalia	Somalia	Suomi-Somalia Seura ry	Conflict
CSO	Hiil Hooyo	Somalia	FSN	Conflict
FLC	Defending the rights of Human Rights Defenders: Core support for the implementation of their strategy	Tanzania	Tanzania Human Rights Defenders Coalition	Innovations
FLC	Mali na Daftari in Livelihood resilience for so in Tanzania	Tanzania	Tanzania Federation of Disabled Peoples' Organisations (SHIVYAWATA)	Disability
FLC	The Able Disabled	Armenia	CivilNet	Disability
FLC	Decent Employment for all Azerbaijan	Azerbaijan	Union of Disabled People's Organization of Azerbaijan	Disability
FLC	Wezesha Amani Mashinani na Mama (WAMAMA) (Grassroots Women Enabling Peace)	Kenya	Rural Women Peace Link (RWPL)	Conflict
ICI	THL-NAPSA Partnership	Zambia	Finnish National Institute of Health and Welfare (THL) and Zambian National Pension Scheme Authority (NAPSA)	Transition
ICI	Capacity building on the development of value chain of wood products industries in Vietnam	Vietnam	Natural Resources Institute	Transition

INSTRUMENT/MODALITY	INTERVENTION NAME	COUNTRY	IMPLEMENTED BY	CASE
ICI	UHMC-FMI Meteorology Project	Ukraine	Finnish Meteorological Institute (FMI)	Conflict
Multilateral	Empowering Adolescents with disabilities through Education and Civic engagement programs in the Ninewa Governorate	Iraq	UNFPA	Disability
Multilateral	African Development Fund (ADF), ADF-15 Concessional Donor Loan	Africa	ADF	Multilaterals
Multilateral	The Lifeline Embattled CSO Assistance Fund	Multi-country	Freedom House	Innovations
Multilateral	UNPRPD MPTF	global	UN	Disability
Multilateral	Core funding contribution to UN Women	Global	UN Women	Multilaterals
Multilateral	Core funding to African Development Bank	Africa	African Development Bank (AfDB)	Multilaterals
Multilateral	Core funding contribution to Green Climate Fund	Global	Green Climate Fund	Multilaterals
Multilateral	Establishment of innovation hubs in Finland	Global	UNICEF	Multilaterals
Multilateral	Human Rights, Inclusion and Empowerment Trust Fund	Global	World Bank	Multilaterals
Multilateral	Finland's support to the Enhanced Integrated Framework (EIF)	Global	EIF Partner Agencies / UN Secretariat	Multilaterals
Multilateral (multi-bi)	Chaguo Langu Haki Yangu 'My Rights My Choices' Protecting the Rights and Choices of Women and Girls, particularly Women and Girls with Disabilities in Tanzania	Tanzania	UNFPA	Long-term partnerships
Multilateral (multi-bi)	Finnish cooperation with UN Women in Kenya	Kenya	UN Women	Conflict
Multilateral (multi-bi)	Delivering on a child's right to education: Strengthening access and quality of learning in Syria (also in the disability case study)	Syria	UNICEF	Conflict
Multilateral (multi-bi)	Office of the High Commissioner for Human Right (OHCHR)s: OHCHR's Work on Women's Human Rights and Gender Equality	Multi-country	OHCHR	Innovations
Multilateral (multi-bi)	INT/Aid for Trade in Central Asia	Central Asia	United Nations Development Programme (UNDP)	Multilaterals
Multilateral (multi-bi)	Women and Girls First Programme in Myanmar	Myanmar	UNFPA	Multilaterals
Multilateral (multi-bi)	Sudan Family Support Programme (SFSP)	Sudan	World Bank	Multilaterals

INSTRUMENT/MODALITY	INTERVENTION NAME	COUNTRY	IMPLEMENTED BY	CASE
Multilateral (multi-bi)	Enhance women's roles in influencing the political process and contribution to peace building in Libya	Libya	UN Women	Multilaterals
Multilateral (multi-bi)	[UNFPA] Somalia women's and girls' well-being Country Programme, Somalia[2]	Somalia	UNFPA	Headwinds
Multilateral (multi-bi)	Delivering on a child's right to education: Strengthening access and quality of learning in Syria	Syria	UNICEF	Disability
PSI: Finnfund	Kasha	Kenya	Kasha Global Inc	Transition
PSI: Finnfund	Expansion of aquaculture business of Yalelo Limited	Zambia	Yalelo Ltd	Transition
PSI: Finnpartnership	Sera Helsinki's project expands to empower people with disabilities	Ethiopia	Sera Helsinki Oy	Disability
PSI: Finnpartnership	Bevetrade	Vietnam	Bevetrade Oy	Transition
PSI: Finnpartnership	Sustainable fertilizers	Zambia	BioSorbio Oy	Transition
PSI: Finnpartnership	Amani Care	Kenya	Amanihoiva Kotihoito Oy	Transition
PSI: Finnpartnership	Identifying Fair Trade partners and launching cooperation in Kenya and Tanzania	Kenya	Mifuko Oy	Transition
PSI: Finnpartnership	Preparation and planning of European Union (EU)-Vietnam REACH Information Centre	Vietnam	Chementors Oy	Transition
PSI: Nordic Development Fund (NDF)	Development of Green Climate Fund (GCF) Proposal on Transforming Landscapes and Resilience for Development Project (TRALARD) (2019-2020)	Zambia	World Bank (WB) and the Ministry of National Development Planning	Transition

VOLUME 2 • CASE STUDY REPORTS