

SUMMARY OF VOLUNTARY PRINCIPLES IMPLEMENTATION EFFORTS DURING 2011

This summary report provides an overview of Participants' efforts to implement the Voluntary Principles on Security and Human Rights ("Voluntary Principles") during 2011. The report is based on the individual implementation reports prepared by Voluntary Principles Participants summarizing their individual and collective activities.

The report was prepared on the basis of the draft Reporting Guidelines first used by Participants to prepare their 2009 implementation reports, and by the Secretariat to prepare the annual summary reports in 2009 and 2010. The Reporting Guidelines are designed to: (i) support transparency regarding efforts to implement (and/or assist in the implementation of) the Voluntary Principles; (ii) assist Participants in reporting on efforts to implement the Voluntary Principles; and (iii) facilitate the exchange of good practices among Participants. Participants of all three pillars—governments, companies, and non-governmental organizations ("NGOs")—are required to submit reports on implementation efforts.

The current report is intended to highlight good practice and progress in Participants' implementation of the Voluntary Principles. It mirrors the four main sections of the reporting guidelines: (A) Commitment to the Voluntary Principles; (B) Policies, Procedures, and Implementation Activities; (C) Country Implementation; and (D) Lessons and Issues. Reporting on categories (A)-(C) is required from all Participants. Reporting on (D) is optional.

A. COMMITMENT TO THE VOLUNTARY PRINCIPLES

1. Statement of commitment or endorsement of the Voluntary Principles¹

All Participants affirmed their commitment to the Voluntary Principles. Participants collectively reported a considerable diversity of approaches in terms of operationalizing this commitment. This variety reflects the different capacities and functions of each Pillar.

All of the members of the Government Pillar made reference to outreach efforts—both domestically and internationally—to promote awareness and adoption of the Voluntary Principles. A number of government Participants referenced the funding of specific projects related to Voluntary Principles implementation. Members of the Government Pillar expressed widespread support for enhancing the governance structure through the recently approved Governance Rules, as well as for the creation of a legal entity. Government Pillar reports also referenced support for the Voluntary Principles through past, present, and/or future service in working groups, on the Steering Committee, or as the Government Chair.

¹ The section numbers in this report correspond to the section numbers in the draft Reporting Guidelines.

Members of the Corporate Pillar referenced a range of internal efforts aimed at ensuring the Voluntary Principles are reflected in their policies, practices, and guidelines. A number of Participants referenced their active involvement in initiatives to enhance the governance structure of the Voluntary Principles. Some members of the Pillar referenced their engagement with the Key Performance Indicators (“KPI”) Volunteer Group,² an independent initiative that is working to develop assurance mechanisms to validate those Participants’ implementation of the Voluntary Principles.

Members of the NGO Pillar all referenced efforts to promote the Voluntary Principles, both globally and through specific in-country initiatives. Many noted their focus on enhancing implementation of, and accountability to, the Principles. This included participation in the Assurance and Accountability Working Group, as well as engagement with the independent KPI Volunteer Group. Members of the NGO Pillar referenced efforts to work with other Voluntary Principles Participants, as well as entities that are not Participants, to promote capacity-building initiatives and multi-stakeholder engagement. Members of the Pillar also reported on promotional activities undertaken in international fora, at company headquarters, with governments, and in priority countries. At least one NGO championed the sharing of information among entities involved in implementation.

B. POLICIES, PROCEDURES, AND RELATED ACTIVITIES

2. Relevant policies, procedures, and/or guidelines

Building on progress discussed in the *Summary Report of the Voluntary Principles Implementation Efforts 2010*, many Participants continued to develop and refine implementation of the Voluntary Principles.

Members of the Government Pillar referenced policy efforts to enhance the Voluntary Principles specifically, as well as corporate social responsibility (“CSR”) more generally. Almost all of the Government Pillar Participants referenced cross-departmental cooperation on the Voluntary Principles. Government agencies, departments, and embassies used both bilateral and multilateral efforts to promote awareness of the Principles. A number of governments referenced the incorporation of the Voluntary Principles into their national strategies on CSR, as well as the development and adoption of communication strategies regarding the Voluntary Principles. Governments also referenced efforts to enhance complementarity between the Voluntary Principles and other multi-stakeholder initiatives (“MSI”) like the International Code of Conduct for Private Security Service Providers (“International Code of Conduct”).

² The KPI Volunteer Group is not an official Voluntary Principles Working Group. It is an unaffiliated independent initiative in which some Voluntary Principles Participants are engaged.

Several members of the Corporate Pillar referenced new or revised policies, procedures, and guidelines designed to improve internal compliance with the Voluntary Principles. Quite a few referenced the incorporation of the Voluntary Principles into their CSR and human rights policies. Many Corporate Pillar Participants made specific reference to company-wide codes of conduct, risk assessment frameworks, and grievance procedures intended to address security and human rights concerns. Members of the Pillar also referenced efforts to develop key performance indicators through the work of the independent KPI Voluntary Group.

Members of the NGO Pillar reported efforts to produce guidelines, reports, and training materials that referenced the Voluntary Principles. A number of NGOs also reported that they had worked with members of the Corporate Pillar to draft and implement company policies and mechanisms relevant to Voluntary Principles implementation. In addition, a few NGO Participants referenced their work with companies in providing human rights assessments, leading workshops, and developing training materials and tools.

One member of the NGO Pillar referenced its efforts to advocate that companies include textual references to the Voluntary Principles in their policies as a relevant standard for ensuring their security practices promote respect for human rights. Another NGO Participant noted that it had hired a senior advocate on International Financial Institutions (“IFIs”), and anticipated that, with this enhanced capacity, would increase its level of engagement with IFIs on issues such as incorporating human rights safeguards, including the Voluntary Principles, in project requirements.

3. Company procedures to conduct security and human rights risk assessments

All members of the Corporate Pillar referenced the adoption and use of risk assessments designed to address security and human rights concerns. Companies discussed employing risk assessments at the site, project, regional, national, and corporate levels. A number of corporate Participants referenced the importance of undertaking human rights risk assessments prior to beginning operations in a new country, including a review of the relevant security context. A number of companies referenced engaging third parties to assist them in undertaking such assessments.

In addition to risk assessments, many companies also referenced use of the Implementation Guidance Tools. Companies also reported that they had conducted gap analyses to evaluate the capacity of their internal policies and procedures to manage human rights and security concerns effectively. One corporate Participant noted that it had performed a Corporate Responsibility Vulnerability Assessment at all of its operations, development properties, and closed sites. The assessment drew from the Voluntary Principles in coverage of security and human rights issues. Another company referenced its mandatory use of a Sustainable Development Scorecard to identify environmental, social, and human rights issues during project development.

4. Company procedures or mechanisms to report incidents that have potential security and human rights implications for company operations

All corporate Participants reported that they had some form of reporting mechanism for incidents. Quite a few companies describe the use of more than one such reporting tool or process. A number of Participants referenced the use of confidential hotlines for receiving reports of incidents. Many companies reported that their hotlines can receive reports in several languages.

Similarly, quite a few members of the Corporate Pillar reported that they used web-based systems to track incidents, as well as to analyze data on reports, investigations, and follow-up efforts. One company noted that it requires each operating division to submit an annual Voluntary Principles report to its internal group on Health, Safety, Environment and Community. Another company stated that its Human Rights Policy requires employees that witness, or have knowledge of, an incident to report it. At least one company noted its policies prohibiting retaliation for reporting or cooperating in an investigation of such an incident.

5. Company procedures to consider the Voluntary Principles when entering into relationships with private security providers

Companies reported a variety of approaches to promoting the Voluntary Principles in their interactions with security forces. One of the primary approaches used by companies is requiring compliance with the Principles through contracts or memorandums of understanding (“MoUs”) with security forces. A number of members of the Corporate Pillar stated that they used due diligence or screening policies prior to contracting with security forces. Another corporate Participant noted that it is preparing standard contract terms that will incorporate the Voluntary Principles into all of its security-related contracts.

One member of the Corporate Pillar stated that it does not seek assistance from military or police personnel absent situations of “dire emergency.” One company noted that private security forces it employs are not allowed to use force without permission from the company. Another company reported that, as a result of an annual internal survey, it had identified inconsistencies in its approach to selecting security providers. It subsequently revised its policy and requirements to include, *inter alia*, a requirement for private security providers to comply with the Voluntary Principles, and a request for public security providers to operate accordingly.

6. Company procedures or mechanisms to address security-related incidents with human rights implications by public/private security forces relating to the company's activities

Members of the Corporate Pillar reported on a variety of processes and procedures to address incidents raising security or human rights issues. Companies used both corporate-wide and site-specific processes. Several companies referenced improvements in their responses to

incidents. A number of companies referenced the importance of undertaking root cause analyses to understand how to best undertake ameliorative or preventive action.

A number of corporate Participants provided data and analyses of security incidents that occurred during the previous year. Quite a few companies noted that, in addition to having reporting policies and tools, they have processes to track corrective or preventive action related to reported incidents. Different companies have different channels through which incidents are reported and elevated, but many members of the Corporate Pillar noted that incident reports are reviewed by people at various levels of seniority within their companies. One company referenced its intent to conduct an analysis of complaint and grievance statistics and trends in an effort to evaluate the effectiveness of its procedures.

7. Examples of promoting awareness of the Voluntary Principles throughout the organization or government

Members of the Government Pillar referenced efforts to increase awareness of and dialogue regarding the Voluntary Principles within their respective administrations. A number of governments referenced efforts to establish connections and dialogues across agencies with regard to Voluntary Principles implementation and policies. Efforts included both formal and informal consultations between government departments, agencies, bureaus, and embassies. Members of the Government Pillar also reported the use of a variety of communications channels to disseminate information regarding the Voluntary Principles, including websites, bulletins, guidelines, briefings, training materials, roundtables, and coordination meetings. One government referenced the existence of an intra-government consultation framework regarding the government's approach to the Voluntary Principles. A number of governments also referenced the creation of action plans and other engagement tools to assist in cross-departmental dialogues. One government reported that its international diplomats were provided with Voluntary Principles-specific training sessions prior to their departure.

Members of the Corporate Pillar used intra-company communications, staff briefings, and trainings to raise awareness regarding the Voluntary Principles. Many companies noted the inclusion of relevant documents and materials on both their internal and external company websites. One member of the Corporate Pillar referenced its global online human rights training module, which includes the Voluntary Principles. Another corporate Participant noted its dissemination of checklists and templates to staff to assist in self-assessment of the company's social responsibility standards. One company referenced that the process of contributing to annual reports helped employees become more familiar with the Voluntary Principles and the effects the Principles have on company policy and operations. Another company noted its use of senior-level, cross functional teams to brief leadership in various business units on the Voluntary Principles.

Members of the NGO Pillar also referenced efforts to increase awareness of the Voluntary Principles within their organizations. Members of the NGO Pillar referenced holding

staff meetings or roundtables during the year that were intended to acquaint staff with the Voluntary Principles. A number of NGOs noted efforts to mainstream the Voluntary Principles within their programming. It was noted that as NGO staff become more familiar with the Voluntary Principles, this was likely to increase organizational capacity to develop relevant programming. Another NGO noted that it had standardized and institutionalized guidelines and approaches for engagement with the private sector regarding the Voluntary Principles. Documents are made available on the NGO's intranet, and are disseminated to program offices in countries with an active extractive industry.

8. Examples of promoting and advancing implementation of the Voluntary Principles internationally

Members of the Government Pillar referenced a range of outreach activities to support work on security and human rights. Speeches, public statements, press releases, and website postings were all means by which governments promoted the advancement of the Voluntary Principles. Various governments reported raising the Voluntary Principles with their counterparts in other countries, through meetings in the margins of the UN General Assembly, Embassy-hosted events, demarches, in-person meetings, phone calls, and e-mails. In addition to state-to-state engagement, members of the Government Pillar also reached out to corporations and members of civil society bilaterally through meetings, conferences, and workshops. This included the provision of CSR guidance for companies. Governments referenced efforts to highlight the Voluntary Principles in official discussions regarding the UN Framework for Business and Human Rights, the International Code of Conduct, and the OECD Guidelines for Multinational Enterprises. At least one government translated materials related to Voluntary Principles implementation into French to assist in its efforts in Francophone countries.

Several members of the Corporate Pillar referenced their participation in the Working Groups on Peru and Iraq. Quite a few companies referenced dialogue with other non-member companies, encouraging them to adopt the Voluntary Principles. Such engagement took different forms, including bilateral dialogues and in the context of industry association meetings. A significant number of Corporate Pillar members noted their involvement in training activities, including in Azerbaijan, Ghana, Indonesia, Iraq, Pakistan, and Panama. These trainings encompassed a broad range of activities, as they targeted company staff, management, public security forces, and private security forces. Trainings ranged from single events to formal series of engagements.

All members of the NGO Pillar engaged in efforts to promote awareness and implementation of the Voluntary Principles. Different NGOs focused on different countries, and their engagement targeted governments, companies, members of civil society, as well as other NGOs. Conferences, workshops, and meetings, as well as tailored, in-country dialogue, were opportunities members of the NGO Pillar used to push for enhanced implementation of the Voluntary Principles. Two NGOs co-published a Guidance Note for International-Level

Implementation of the Voluntary Principles. Another referenced the development of a tool to assist in Voluntary Principles-compliant risk assessments. One NGO highlighted the importance of diversifying public engagement and adopting a multi-pronged approach to programming in order to maximize the impact of efforts. Various NGOs also mentioned their engagement with non-Participant governments and companies, advocating for adoption of, and participation in, the Voluntary Principles.

C. COUNTRY IMPLEMENTATION

9. Overview of country operations

Voluntary Principles Participants reported on policies, advising, contracts, assessments, dialogues, workshops and trainings related to security and human rights focusing on a wide range of countries, including Angola, Australia, Azerbaijan, Brazil, Cambodia, Canada, China, Colombia, Democratic Republic of Congo (“DRC”), Denmark, the Dominican Republic, Egypt, Equatorial Guinea, Ethiopia, Georgia, Ghana, Indonesia, Iraq, Ireland, the Kurdish Autonomous Region in Northern Iraq, Liberia, Libya, Madagascar, Mexico, Mongolia, Mozambique, Myanmar, Netherlands, Nigeria, Norway, Oman, Pakistan, Panama, Papua New Guinea, Peru, the Philippines, Qatar, South Africa, South Sudan, Switzerland, Tanzania, Tunisia, Turkey, the United Kingdom, the United States, and Zimbabwe.

Although Participants reported on implementation activities in many countries, several countries were noted in a high number of reports, including Colombia, Peru, DRC, and Indonesia. The summary reporting below highlights specific implementation efforts in these countries.

10. Engagements with stakeholders on country implementation

Colombia

Members of all Pillars continued to work with and support the Mining and Energy Committee on Human Rights (“CME”) in Colombia. In 2011 the organization presented Colombia’s National Plan on Voluntary Principles to the Annual Plenary Meeting in Ottawa, Canada. The National Plan includes a risk analysis in the new security model for extractive industries, a guide for companies on the Voluntary Principles, various regional promotion activities, promotion of the Voluntary Principles on government websites, and further coordination between the Government and CME. Different members of the NGO Pillar cooperated with members of the Corporate Pillar on risk assessments in Colombia, as well as gap analyses and action plans aimed at improving implementation of the Principles in Colombia. One NGO reported that it intends to draft a report presenting lessons learned related to implementation of the Voluntary Principles by companies operating in Colombia.

Peru

Similarly, members of all Pillars referenced efforts to support the implementation of the Voluntary Principles in Peru. Representatives from all Pillars have participated in the regular meetings convened by Socios Peru, a national NGO serving as the technical secretariat for the Working Group on Implementing the Voluntary Principles in Peru. At least one NGO worked with members of the Corporate and Government Pillars to implement recommendations of an independent review of security and human rights practices related to a specific project in Peru. A member of the Corporate Pillar noted the development of a protocol to deal with conflictive social scenarios in Peru, taking into account the Voluntary Principles, company policies, Peruvian Law, and other considerations.

Despite the host government being distracted from the Voluntary Principles following the general elections, a number of Participants referenced continued progress in terms of the efforts undertaken, particularly by the Peru Working Group. A few NGOs referenced efforts to increase dialogue with the Peruvian government in order to promote the Voluntary Principles, as well as efforts to promote engagement with the Peruvian Government by members of the Government Pillar.

Democratic Republic of Congo

A number of Participants noted that implementation progress was slow in the DRC during 2011 due to challenges posed by the unstable political climate. A few Participants nonetheless reiterated their intent to work towards adoption of the Voluntary Principles by the DRC, as well as to further disseminate information about the Voluntary Principles within the country. One member of the NGO Pillar referenced conducting a scoping study on the Voluntary Principles in collaboration with a member of civil society in the DRC. A copy of the study will be shared with the country Working Group and will include a mapping of key players, an overview of efforts undertaken to implement the Principles, and recommendations for improved implementation of the Principles. Another member of the NGO Pillar referenced its comprehensive survey of artisanal mining situations in the Ituri Province, with the aim of identifying challenges and options for Voluntary Principles implementation. A number of companies, with the support of at least one Participant NGO, recently resurrected the Katanga Security and Human Rights Network, which meets once a month.

Indonesia

A number of Participants referenced work with the Indonesia Centre for Ethics (“ICE”) to raise awareness of the Voluntary Principles with the Government of Indonesia, the police, and international companies operating in Indonesia. A number of Participants contributed and participated to a series of conferences organized by ICE in 2011. A few Participants also made note of their intention to follow up with government officials in Indonesia regarding stronger formalized engagement with the Voluntary Principles.

Nigeria

A number of Participants referenced increased multilateral engagement in Nigeria. Several Participants emphasized the importance of engaging the Government of Nigeria in efforts to implement the Voluntary Principles, and reported on specific efforts to engage Nigerian authorities in discussions regarding the Voluntary Principles. Members of the Government Pillar were particularly involved in efforts to engage bilaterally with the Government of Nigeria.

One member of the NGO Pillar provided information regarding its training program on the Voluntary Principles in Nigeria, which addresses issues of human rights in the oil sector. The same NGO worked with a member of the Corporate Pillar to introduce the company's human rights policy to its security personnel in Nigeria.

Other Countries

A few Participants referenced bilateral and multilateral engagement with the Government of Australia as part of an effort to encourage that country to participate in Voluntary Principles implementation efforts. Another Participant referenced ongoing dialogue with Zimbabwean civil society organizations to identify ways that the Voluntary Principles may be used in engagement with government and industry. Another Participant noted its involvement with officials in Papua New Guinea to promote training for all police officers on human rights.

11. Voluntary Principles considerations in the selection of private security providers, the formulation of contractual agreements with private security providers, and interactions with public security forces regarding security arrangements

A large number of Corporate Pillar Participants referenced the inclusion of the Voluntary Principles in contracts signed with security forces. Some Participants couch the Principles in broader terms relating to human rights and social responsibility, while others include explicit reference to, and the language of, the Principles. One corporate Participant referenced its intent to develop a MoU referencing the Voluntary Principles for use with the public security forces that it engages. A few companies noted the complementarity of the Voluntary Principles and other MSIs, particularly the International Code of Conduct. When hiring security forces, quite a few Participants require security providers to comply with both the Principles and the Code of Conduct. One company specifically stated that it requires the private security companies that it hires to be signatories to, or agree in writing to comply with, the International Code of Conduct.

At least one company noted the importance of making public the agreement(s) it has with public security forces. Such transparency helps the company communicate its commitments to local communities.

One company noted that if there is an intervention from public security forces, a report of the incident must be produced by the company. Another company requires approval from the company for the use of force by the contractor.

12. Examples of supporting outreach, education, and/or training of (i) relevant personnel; (ii) private security personnel; (iii) public security personnel; and/or (iv) civil society (e.g., local NGOs, community groups)

Members of the Government Pillar referenced efforts to support implementation processes as well as outreach initiatives. Participants provided promotional and operational materials to governments and companies. A number of Participants referenced outreach undertaken by their Embassies, referencing in particular Australia, Colombia, the DRC, Indonesia, Nigeria, Peru, and Tanzania.

In Tanzania, members of the Government, Corporate and NGO Pillars discussed efforts to ensure respect for the Voluntary Principles on the ground. One government was particularly interested in supporting the work of other actors with security and local communities. One member of the NGO Pillar undertook significant programming in Tanzania, including monthly and bi-monthly police training programs, solidarity activities, participatory theater conflict transformation training, and publication of comic books designed to reinforce messages communicated during training programs.

A number of members of the Corporate Pillar referenced training programs for public and private security forces, both in-person and online. Some provided data as to the number of individuals trained, the frequency of training, and the scope of the curriculum. Some Participants referenced partnerships with NGOs centered on facilitating multi-stakeholder dialogues on business and human rights. One corporate Participant noted that it hosted a sporting event for several villages in Indonesia as an opportunity to share the company's security procedures with community stakeholders, and to receive any comments or concerns from the community. Another corporate Participant noted that 100% of its workforce in Oman and Qatar received human rights training.

In addition to in-person and online training courses, at least one member of the Corporate Pillar referenced employing a "train the trainer" program to broaden training capacity and reach. One Participant noted the use of joint training exercises between private and public security forces to foster trust, communication, cooperation, and coordination.

Members of the NGO Pillar undertook various outreach and training activities, including conducting training on the Voluntary Principles for a range of actors, among them NATO personnel, staff of international companies, and security forces. A member of the NGO Pillar engaged bilaterally with a company working in Papua New Guinea on a remediation initiative designed to address violence against women in the area in which the company operated. The initiative included enhancing human rights trainings for security personnel employed by the company and implementing an individual reparations program.

13. Company procedures to review progress on implementing the Voluntary Principles at local facilities

Members of the Corporate Pillar referenced a variety of policies and tools intended to evaluate the success of implementation efforts. These efforts included company-led initiatives, as well as reviews undertaken by third parties. One corporate Participant noted the publication of reports written by external monitors regarding its operations in various countries, including issues related to security and human rights.

Some Participants referenced participation in the KPI Volunteer Group as a means to enhance implementation of the Principles. A number of Participants referenced undertaking regular risk assessments and gap analyses to ensure policies and mechanisms designed to implement the Principles are effective. Similarly, quite a few Participants noted the use of the Implementation Guidance Tools as a means to review implementation progress. At least one Participant noted that the exercise of drafting the annual Report to the Voluntary Principles Plenary was helpful in reviewing progress in terms of implementation of the Principles.

D. LESSONS LEARNED AND RECOMMENDATIONS

Participants identified a wide variety of lessons and recommendations with regard to the Voluntary Principles generally, as well as with regard to implementation efforts specifically.

Voluntary Principles Governance

- Many Participants commended the work undertaken in 2011 to improve the Voluntary Principles' governance structure, as well as accountability to the Voluntary Principles. They noted in particular the adoption of the Governance Rules and progress on the formation of a legal entity in The Netherlands. One Participant noted the importance of close cooperation between representatives of all three Pillars in the successful development of the Governance Rules. At least one Participant noted that after devoting significant time to the topic of governance, it looks forward to recommitting its energy to in-country and project-level implementation of the Voluntary Principles.
- At least one Participant expressed strong interest in ensuring that substantive progress is made in 2012 in the development of assurance mechanisms.
- At least one Participant expressed interest in reviewing the standards and implementation practices of the Voluntary Principles, with an eye toward ensuring continued legitimacy and efficacy of the framework.
- One Participant, citing remarks by U.S. Secretary of State Hillary Clinton, U.S. Assistant Secretary of State Michael Posner, and Professor John Ruggie, strongly advocated for a sustainable governance framework for the Voluntary Principles, as well as greater clarity regarding reporting requirements and expectations on reporting and accountability.

Implementation: Engagement with Stakeholders

- One Participant observed that most materials regarding the Voluntary Principles are focused on corporations. A number of Participants suggested that efforts should be undertaken to demonstrate the value of the Principles to host governments, particularly in terms of public security capacity building.
- A few Participants noted the importance of renewed engagement with stakeholders as they return to Egypt and Libya following the recent political upheaval.
- One Participant noted the utility of partnering with NGOs with expertise in the area of business and human rights. The Participant noted that such engagement was of significant value as it revamped its internal Voluntary Principles processes.
- A number of Participants noted their intention to encourage states and companies to join the Voluntary Principles, and in the interim to implement the Principles.
- One Participant noted the importance of a company fully implementing the Voluntary Principles, as well as the associated tools, because of the signal that it sends to employees, communities, and governments regarding its commitment to human rights.
- A few Participants indicated their intention to continue providing support to companies in the form of human rights and risk assessments, as well as training. Development of in-house expertise was mentioned as one way of supporting these activities.
- One Participant noted its plan to undertake research on the impacts of mining and extraction on women and girls, as well as to explore the roles they play in engagements between extractive sector companies and communities.
- Another Participant noted that it had adopted promotion of the Voluntary Principles in the European Union as a lobbying and advocacy goal of 2012.
- A number of Participants referenced the importance of strengthening the bottom-up dimension of the Voluntary Principles initiative, to better complement the strong top-down element. At least one Participant noted the importance of strengthening local community involvement.
- One Participant noted the importance of making agreements with security forces public, so that the community will know the terms of engagement and the commitment to human rights articulated in the contract between the company and security forces.
- Another Participant noted that it would be helpful to have standardized contract language and requirements related to the Voluntary Principles.

Implementation: Management Systems

- A number of Participants indicated their commitment to ongoing efforts to enhance implementation of the Principles, ensuring operational impact. A few Participants noted the challenge posed by joint ventures and partner-operated programs in terms of ensuring implementation of the Voluntary Principles.
- At least one Participant indicated its commitment to capitalize on momentum achieved in 2011 in terms of efforts to raise awareness of the Voluntary Principles among non-Participants. This same Participant also shared its view that improved participation of communities and members of civil society is important, particularly in countries in which awareness of the Principles is low. One way to address this is to continue efforts designed to develop local capacity. This is a goal shared by a number of Participants, as many agreed that, with capacity, comes more effective engagement and cooperation in terms of implementation.
- Despite efforts in 2011 to improve accountability, at least one Participant in the NGO Pillar lamented the ability of the Voluntary Principles processes to verify and assess performance. Such constructive criticisms served as the foundation for the work of several Participants in the independent KPI Volunteer Group.
- One Participant highlighted the importance of knowledge-sharing networks, particularly in-house, to promote the Voluntary Principles.
- A member of the NGO Pillar noted that lessons learned and best practices will be used to mainstream project successes in other programs engaging companies, governments, and NGOs.
- At least one Participant referenced its intention to develop expertise in performing high-quality risk assessments.
- One corporate Participant noted the importance of integrating the Principles throughout business processes. Another corporate Participant noted that internally its local management was eager to have clear guidance regarding how to implement the Voluntary Principles.
- One Participant observed that additional external resources may be necessary for promotion and training activities when a company is faced with heightened security risks. The same Participant noted the importance of developing training approaches tailored for the local culture, and engaging members of the local community in these activities, particularly in regard to management of incident reports and grievances.