

## National Action Plans on Business, Security and Human Rights

### Lessons from peer learning among governments

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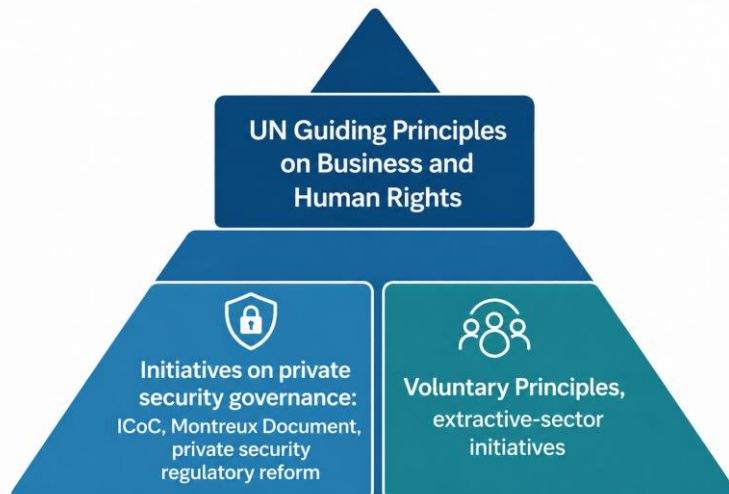
#### Introduction:

Governments in resource-rich and conflict-affected contexts face complex challenges in managing security for extractive and infrastructure projects while ensuring respect for human rights. Such challenges are increasingly connected to broader questions of trade, investment, and governance of natural resources. At the same time, the increasing global demand for critical raw materials (CRM) underscores the need for strong governance and security arrangements that balance economic opportunities with community engagement, cooperation, and multistakeholder approaches that ensure the protection of human rights and resilient peace. This context also presents an opportunity for reinforced international and regional cooperation. For instance, African countries, which host some of the world's largest reserves of extractive and mineral resources, are actively engaging in dialogue to exchange knowledge and lessons learned on extractive governance, security management, transparency, and locally-led approaches to value addition and sustainable management of resources.

The UN Guiding Principles on Business and Human Rights (UNGPs), the Voluntary Principles on Security and Human Rights (VPs), and initiatives on private security governance such as the International Code of Conduct for Private Security Service Providers (The Code) provide complementary frameworks to guide state engagement with private sector actors, public and private security providers, and affected communities. Against this backdrop, National Action Plans (NAPs) are an instrumental tool to guide government efforts to address security and human rights issues in business operations. NAPs allow government actors to establish priorities and lines of action, clarify the roles and responsibilities of different stakeholders, as well as to identify ways to access and manage resources. By setting a practical roadmap built on clear methodologies, NAPs ensure continuity and coherent approaches, particularly in the face of political shifts, competing priorities and limited government capabilities. To guarantee ownership and buy-in, thereby increasing chances of successful implementation, it is crucial that NAPs are developed following a process of consultation with a wide range of actors, including private companies and civil society.

With governments in resource-rich and conflict-affected settings at various stages of engagement with the UNGPs, the VPs and private security frameworks, there is a need for coherent approaches that leverage synergies, avoid duplication, and ensure complementarity of [initiatives](#). Such efforts should harness the added value of each framework, such as the emphasis on multi-stakeholder engagement of the VPs and the strong presence of business actors, or the involvement of technical actors in private

security governance initiatives. Amid declining development financing, and a wider global context of pressure over natural resources, conflict, and competition for critical raw materials, enhanced coordination across different frameworks and actors is vital to ensure that all actions feed into stronger approaches to business, security, and human rights.



### Background:

In 2025, the UK Foreign, Commonwealth and Development Office (FCDO) commissioned DCAF- the Geneva Centre for Security Sector Governance to organise a peer-to-peer learning exchange involving government representatives, to strengthen government capacities to develop, implement and align international initiatives through the exchange of good practices and lessons learned. Together with the FCDO, the United Nations Development Programme (UNDP), and the Secretariat of the Voluntary Principles Initiative (VPI), DCAF identified relevant participants from the governments of DRC, Ghana, Mozambique, and Nigeria. The selection of these four countries reflects the significance of their extractive industry sectors and their levels of engagement with business, security and human rights initiatives - with some currently developing their NAPs to become full VPI members (Mozambique), while others have recently concluded theirs and become full members (DRC). With the objective of facilitating the exchange of experiences, Ghana, a full VPI member, was also invited. The session was a key opportunity for the government of Nigeria, not yet a member, to engage with the other countries and actors involved in the VPI. UNDP, a leading actor in the promotion of responsible business conduct, was invited to participate and share insights on the UNGPs with participants, who also benefited from exchanges with representatives from the FCDO and Switzerland.

The peer learning workshop took place on 23 March 2026 at the FCDO headquarters, in the margins of the Annual Plenary Meeting of the VPI. The workshop, held under Chatham House rules, brought together 25 participants from the four countries, DCAF, FCDO, UNDP, and the VPI Secretariat.

## Key Takeaways and Recommendations:

The participants identified common challenges and explored practical approaches to advance the business, security, and human rights agenda through a coherent approach to NAP development. Key recommendations and lessons learned include:

### ✓ **Local ownership is essential**

- Comprehensive multistakeholder consultations enable States to determine their priorities, needs, capacities and opportunities, which ensures that the format and content of the NAP are grounded in national realities and capacities, strengthening the legitimacy, feasibility and sustainability of the NAP.

### ✓ **The value of inclusivity and partnerships**

- NAP development and implementation require coordination among multiple government departments, as well as with the private sector, NHRIs, civil society, and international partners. Moreover, strong coordination and engagement with international partners can contribute to strengthening implementation by helping achieve sustainable funding, for instance, by leveraging complementary institutions and initiatives (OECD; EITI).

### ✓ **Integrating security as a transversal element of business and human rights**

- When companies operate in fragile contexts, any human rights issue – when left unaddressed – can escalate and create negative security implications for people, the State, and businesses. Equally, security challenges can create severe human rights impacts. This is why, in order to be comprehensive, an effective NAP must integrate security as part of a holistic approach to business and human rights, weaving together the UNGPs and including security, conflict prevention, and respect for international humanitarian law.

### ✓ **NAPs are living documents and should be regularly reviewed**

- NAPs take significant resources to develop and negotiate – governments should ensure sufficient time for their mid-term review/adaptation. Such flexibility enables governments to incorporate new sectors and high-risk areas. NAPs should leave room for adaptation or review based on emerging issues such as digital rights, surveillance, and evolving security risks.

- At the same time, governments should adhere to long-term commitments established in NAPs, which are essential to guide government action particularly during political transitions. A strong NAP provides continuity despite staff turnover in both the public and private sectors, ensuring that the overall direction and required steps remain clear even as personnel change.

### ✓ **NAPs are strategic coordination tools**

- NAPs help align government strategy and action across ministries, clarify institutional roles, and avoid duplication between different but overlapping agendas. They create a structured framework connecting UNGPs, VPs, and private security regulation, thereby supporting a long-term commitment towards business and human rights.

✓ **Overcoming funding and resource constraints**

- Sustainable funding is necessary for monitoring, training, and implementation, and allows for continuity of NAPs in light of government or staff changes. Engaging multilateral and international partners is key to mobilizing additional resources; however, ultimately, it is national Governments that need to allocate sufficient domestic resources to support the full lifecycle of NAPs.

- Allocating resources in a sustained manner can also be cost-efficient: investing in coordination, planning, identification of gaps and opportunities within the NAP process enables more effective implementation and helps avoid fragmentation that may in the long run be more resource-demanding.

✓ **NAPs should not be a ‘tick the box’ exercise**

- Effective NAPs are grounded in baseline studies and measurable indicators, which allows for a systematic monitoring of progress and accountability of all involved actors.

- When drafting NAPs, governments need to ensure that they contain clear objectives, activities, and realistic timelines for implementation rather than summarizing the actions that the government is already undertaking. Having a set of measurable targets and indicators strengthens the NAP’s function as a governance tool as opposed to a box-ticking exercise.

✓ **A good NAP has a good “ABC” — Awareness raising; Building of capacities; Collaboration**

- Communication and transparency through the media, government websites, or public forums such as townhall meetings enables the public and key stakeholders to feel continuously ‘looped in’, ensuring support to activities and greater buy-in.

- Throughout the NAP process, there is a need for sustained capacity-building and awareness-raising among all stakeholders, from members of Parliament to security personnel, NHRIs, Bar associations, media, and civil society, to ensure that all actors are advancing towards the same goals.

✓ **Bridging the gap between policy and practice**

- Many countries face challenges moving from commitments to implementation. A combination of capacity building with strong emphasis on accountability towards the commitments made is critical to bridge that gap.

- Parliaments and monitoring committees play a vital role as actors with oversight capacities over implementing governmental agencies. To conduct such oversight, they need to be sensitized on NAPs.

- At the same time, NAPs and other governance roadmaps are also key elements that can contribute to closing this gap by strengthening the regulatory environment in which companies operate, particularly in the context of private security governance.

✓ **Incentives to ensure buy-in**

- Incentivizing all stakeholders, particularly businesses, can drive more compliant corporate behaviour. Certain countries link registration or licensing of businesses conditional upon certification of human rights compliance. Turning human rights compliance into something positive for companies can help turn this soft law into policy, and, eventually, into legislation.

✓ **Designating technical focal points can strengthen coordination and implementation**

- Governments should nominate technical focal points who are ‘honest brokers’ and carry the trust of various government agencies, local civil society, companies, and international partners to advance NAPs on a practical level.
- These ‘champions’ can also help drive the agenda forward in cases of government changes. International partners, such as UNDP, can be instrumental in supporting continuity amid political shifts.

✓ **Effective monitoring and evaluation are crucial to ensure policy alignment**

- Evaluations of previous NAPs are crucial to improving subsequent NAP cycles. Independent oversight can identify strengths, gaps, lessons learned, and subsequent priorities, as well as complementarities between BHR NAPs, VPs implementation efforts, and private security governance reforms – thereby strengthening policy alignment, accountability and buy-in across involved entities.
- Monitoring and evaluation arrangements must be tailored to the country’s institutional framework and capacities. Depending on the institutional architecture, countries may opt for creating dedicated monitoring committees or developing specific monitoring and evaluation (M&E) frameworks to ensure that objectives and indicators are well targeted, reflected in the NAP, and followed up on.

✓ **Perfect should not be the enemy of the good**

- The ultimate focus of the NAP process should be on implementation and driving progress, and not necessarily on producing a perfect document.
- While NAPs carry an administrative burden, governments should ensure that administrative requirements linked to NAP development and implementation remain proportional to their capacity to implement. Establishing clear priorities, roles and responsibilities, and engaging with international partners can help access and rationalise resources and build capacities, thus avoiding duplication of efforts and reinforcing impact.

✓ **There is no ‘one size fits all’ approach to NAPs**

- The national context will determine the framework for the development and implementation of a NAP. In some cases, this may translate into one NAP encompassing different issues, or several NAPs focusing on specific topics under one central body overseeing implementation. Governments should adopt approaches that fit their political, institutional, and normative frameworks, such as developing addenda on relevant topics to an existing NAP in order to harness synergies and avoid duplications.
- Where multiple NAPs or related roadmaps exist, clear cross-references should be included to ensure coherence and that all instruments mutually reinforce one another.

### **Conclusion:**

The peer learning workshop was an important first step towards stronger collaboration among Governments and international stakeholders. It provided a platform for constructive exchange of ideas, lessons learned, and common challenges, and allowed participants to establish ties with counterparts in other countries and international partners. Yet, this exchange highlighted the need for more such spaces for multistakeholder dialogue and South-South exchange, where governments, private sector actors, and civil society can come together to share ideas, challenges, and good practices. Ultimately, fostering these exchanges is essential to enabling stronger, more inclusive, and sustained engagement, which will be critical to achieving effective resource governance.