



VRIJE
UNIVERSITEIT
AMSTERDAM

VU Assessment framework

Risks surrounding violations of
human rights and armed conflict
in international collaborations

version 2.0 – 24 june 2025



1. Introduction

1.1 Introduction

The practice of science is impossible without international collaboration. There is a growing awareness at VU Amsterdam of the fact that collaborations that are permitted by laws and regulations are not always desirable from the perspective of human rights and armed conflicts. This assessment framework for 'Risks related to human rights violations and armed conflicts' (hereinafter: **'Assessment Framework'**) has been developed to make staff members aware of these risks and to help them take well-considered decisions concerning whether or not to collaborate with a given organisation or person.

This Assessment Framework succeeds and replaces the framework adopted by the Executive Board in July 2024. The Assessment Framework has been modified based on experiences in the pilot phase, feedback received from the VU Amsterdam community, insights from other academic institutions and the Advisory Committee's evaluation. This version of the framework was adopted by the Executive Board on 24 June 2025, and it will enter into force on 1 September 2025. Every individual, faculty, service department and institute affiliated with VU Amsterdam will be required to apply the Assessment Framework from this date. The Assessment Framework and its application will be evaluated on a regular basis and modified as needed.

1.2 Guiding principles

Sound research, education and knowledge transfer require international (academic) relationships. Thanks to international collaborations, we are more successful in jointly addressing the challenges in the world. Partners around the world, ranging from universities, government institutions and businesses to non-governmental organisations, seek collaboration to exchange ideas, to conduct research and to share data. This contributes to global knowledge production, truth-telling, better education, economic development, and mutual understanding and well-being amongst people.

There are circumstances where it may be allowed to enter into an international collaboration with a certain organisation or individual from a legal perspective, but where this can nevertheless be problematic. This Assessment Framework serves to support VU Amsterdam employees in making decisions about whether or not to enter into or continue international collaborations that are or could be related to gross human rights violations (genocide, crimes against humanity and war crimes) or armed

conflict. If a potential partner is a central, regional or local government institution that takes political decisions and is involved in a war, it will be necessary to consider whether the collaboration might contribute to the armed conflict. The same applies for intended partners that are not central, regional or local authorities, but that are based in countries where armed conflict is taking place.

The Assessment Framework does not provide any ready-made answers. It provides a defined process focusing on the most objective possible analysis and assigning adequate prominence to the circumstances of the specific collaboration.

VU Amsterdam proceeds from the following guiding principles:

1. Academic freedom is a major asset that is accompanied by the responsibility to ensure responsible and scientifically sound teaching and research.
2. When entering into international collaborations, VU Amsterdam adheres to all applicable laws and regulations, including EU and UN sanctions lists.
3. VU Amsterdam operates independently and free of political, ideological or commercial influences.
4. VU Amsterdam does not collaborate with organisations or individuals who contribute directly to gross human rights violations.
5. In principle, VU Amsterdam does not collaborate with central, regional or local authorities of countries where there is plausible evidence that such human rights violations are being committed.
6. In principle, VU Amsterdam does not rule out collaboration with organisations other than central, regional or local authorities (e.g. universities, knowledge institutions, NGOs and other organisations that do not take political decisions) in countries where there are risks of gross human rights violations or armed conflict.
7. Academic freedom is a fundamental guiding principle when entering into international collaborations. For this reason, decisions concerning whether or not to enter into an international collaboration are made at the level of the faculty and in consultation with the researcher/researchers as far as possible.
8. Consideration should always be given to the specific case, in all its facets, in relation to the intended partner. Organisations or individuals are not excluded in advance because of the country in which they are based.

9. The academic autonomy and freedom of action of an organisation, organisational unit or employee are significant factors in decisions on collaboration. Less autonomy translates into a greater reluctance on the part of VU Amsterdam to enter into a collaboration.
10. The estimation of Dual Use risks is subject to the VU Amsterdam Knowledge Security Framework.

This framework provides firm guidance on the considerations to be made with regard to collaborations involving risks. Academic freedom is a major asset, but it is accompanied by the responsibility that VU Amsterdam assumes as a core value, as well as by existing related agreement (e.g. concerning academic integrity).

The design of this Assessment Framework is similar to the way in which knowledge security is organised within VU Amsterdam: responsibility rests with individual researchers and their faculties, but with support from the university level.

1.3 Scope

The Assessment Framework should be followed in the situations listed below.

Type of collaboration

in case of a:

- a. **financial component**: when the collaboration involves VU Amsterdam receiving and/or providing funds and includes an international partner (either directly or indirectly, as in a consortium or as a sub-contractor); or
- b. **institutional collaboration**: when VU Amsterdam engages in institutional collaboration with a partner, without any funds being received or provided. An example would be a Memorandum of Understanding (MoU) that VU Amsterdam signs with a foreign university for student exchange.

PLEASE NOTE: Therefore, the Assessment Framework does not need to be applied if a researcher at VU Amsterdam collaborates on publications with one or more researchers from foreign universities or a researcher receives a guest appointment at a foreign university.

All types of collaboration partners

The Assessment Framework should be applied to all types of collaboration partners (e.g. natural persons, universities, government institutions, companies, non-governmental organisations).

Future collaborations and extensions

The Assessment Framework should be applied in the case of future collaborations¹ and the extension of present collaborations in the field of research, education and knowledge transfer.

Changing conditions in existing collaborations

The Framework must be applied when circumstances change to a point where risks associated with gross human rights violations or armed conflict arise within an existing collaboration.

¹ Ongoing projects that are potentially risky will be assessed against this Framework.

2. Assessment framework

2.1 Two types of intended collaboration partners

This Assessment Framework will be applied when entering, renewing or continuing a collaboration, and it has been designed to support the staff member wishing to initiate or renew a collaboration (the initiator). The faculty directors of operations and directors of service departments are responsible for the application of the Assessment Framework. Any staff member with concerns about a collaboration can ask the Faculty Board or relevant contact person to review the collaboration (or to have it reviewed) according to the Assessment Framework. The Assessment Framework consists of two separate routes.

- Route 1 concerns collaborations with a **central, regional or local government institution as a partner**. By this, VU Amsterdam means a government body within which political decisions are taken (e.g. in the

Netherlands, the central government, the province or the municipality).

- Route 2 concerns collaborations with **a partner other than a central, regional or local government institution**.

2.2 The Assessment Framework

Both routes start with the check whether the collaboration is prohibited under EU or UN sanctions, other laws and regulations, and/or UNL agreements. This is followed by a number of questions related to convictions, interim measures for and/or reports of gross human rights violations. Gross violations of human rights are defined in the Assessment Framework as atrocity crimes. These are genocide, crimes against humanity and war crimes.

2.2.1 What steps must be taken?

Step 1: Partner check (route 1)

a. Check whether the collaboration is prohibited by law
VU Amsterdam does not collaborate with institutions, companies or individuals appearing on the EU or UN sanctions list, or if there is a prohibition on collaboration due to other laws and regulations, or UNL agreements. See: [EU Sanctions Map](#). If this is not the case, proceed to question b.

Please note: certain technologies and fields of work related to specific countries may also fall under sanction regulations. Please consult the factsheet on 'Country-specific sanctions on technology' for further details. This factsheet is available at the [staff page on knowledge security](#).

b. Is there a conviction or interim measure for the country in relation to gross human rights violations by the ICC, ICJ or a national court?

Check whether the ICC, ICJ or a national court has issued any convictions or interim measures for gross human rights violations against the country or any of its government officials. If this is the case, in principle VU does not collaborate with this partner institution.

If this is not the case, proceed to question c.

c. Has the OHCHR or the International Commission of Jurists reported on gross human rights violations by the intended partner country?

Please consult www.icj.org and www.ohchr.org.

If reports have appeared, write a consideration and assessment file on the partner, as described in Step 3. If this is not the case, proceed to question d.

d. Is there an armed conflict in the intended partner country?

If the intended partner country is involved in armed conflict, there is a higher risk of contributing to gross human rights violations. This refers to both armed conflict with another country and domestic conflicts. Check if [Today's Armed Conflicts](#) or the [Global Conflict Tracker](#) indicate that the country of establishment is involved in an armed conflict. If so, proceed to Step 2. If not, there are no objections with regard to collaboration from this assessment. Ensure that any other relevant assessments and verifications are carried out before the request for decision is submitted to the Faculty Board.

Step 1: Check of partner and country of establishment (route 2)

a. Check whether the collaboration is prohibited by law.

VU Amsterdam does not collaborate with institutions, companies or individuals appearing on the EU or UN sanctions list. It also does not collaborate if there is a prohibition on collaboration due to other laws and regulations, or UNL agreements. See: [EU Sanctions Map](#). If this is not the case, proceed to question b.

Please note: certain technologies and fields of work related to specific countries may also fall under sanction regulations. To this end, please consult the factsheet on 'Country-specific sanctions on technology'. This factsheet is available at the [staff page on knowledge security](#).

b. Has OHCHR reported on gross human rights violations by the intended partner, or has a conviction been issued by a national court?

If this is the case, the guiding principle is that no collaboration with this partner is permitted. If this is not the case, proceed to question c.

c. Is there a conviction or interim measure for the country of establishment in relation to gross human rights violations?

Check whether the ICC, ICJ or a national court has issued any ruling in this regard. If this is the case, write a consideration and assessment file on the intended collaboration partner, as described in Step 3. If not, proceed to question d.

d. Has the OHCHR or the International Commission of Jurists reported on gross human rights violations by the intended partner's country of establishment?

Please consult www.icj.org and www.ohchr.org. If reports have appeared, write a consideration and assessment file on the partner. If this is not the case, proceed to Question e.

e. Is there an armed conflict in the country of establishment?

If the intended collaboration partner's country of establishment is involved in armed conflict, there is a higher risk of contributing to gross human rights violations. This refers to both armed conflict with another country and domestic conflicts. Check if [Today's Armed Conflicts](#) or the [Global Conflict Tracker](#) indicate that the country of establishment is involved in an armed conflict. If so, proceed to Step 2. If not, there are no objections with regard to collaboration from this assessment. Ensure that any other relevant assessments and verifications are carried out before the request for decision is submitted to the Faculty Board.

Step 2: Consideration and assessment (route 1 and route 2)

In this step, initiators weigh the case in all its facets against the risks identified in Route 1 or Route 2, in consultation with their faculties. The following factors play a role in this regard:

- the nature and content of the collaboration;
- the attitude and stance of the intended collaboration partner towards the risks identified;
- the role of the organisational unit with regard to identified risks; and
- the manner in which the intended collaboration partners express themselves and behave with regard to the risks identified.

All these factors influence the considerations made within the principles and boundaries defined in this

Assessment Framework. For a proper consideration the following questions need to be addressed.

a. What are the reasons for establishing the collaboration?

Clearly explain the reasons for establishing the collaboration with the potential collaboration partner. Indicate the importance of this collaboration or project. Examples include the partner's scientific expertise, help in accessing certain (context-specific) data (e.g. to prevent Eurocentric research), contributing to societal change (the potential of the collaboration to help improve the position of marginalised groups), contributing to peace building, science diplomacy, etc.

Highlight the reason for the collaboration for the department, faculty or service department, as well as VU Amsterdam as a whole, and possible alternatives if the collaboration does not go ahead. Make reference also to VU Amsterdam's values and responsibilities. For example, facilitating educational exchanges with a partner can promote peaceful relations, as this ensures that people from different countries, with formal complex relationships, can stay connected.

b. What are the risks of the collaboration activity in terms of gross human rights violations and armed conflict?

- Indicate the risks that ensue from Routes 1 and 2. What do these risks entail for entering into the collaboration in terms of the collaboration activity? Consult the [Uppsala Conflict Data Program](#) for more background regarding the conflict.
- Highlight risks associated with the content and activities of the collaboration.
- Projects can be classified as high risk (directly contributing), medium risk (potential for indirect contribution) or low risk (no contribution).
- Describe the unit with whom the collaboration takes place and its relationship to any risks identified.

c. What are the risks concerning the collaboration partner in terms of gross human rights violations and armed conflict?

- Outline the risks around gross human rights violations in relation to this partner. What do these risks entail for the establishment of the collaboration with the partner?
- Indicate risks concerning whether the collaboration partner is contributing to the armed conflict (e.g. through military or operational research that can be applied in the conflict).
- Examine how the individual, department and/or faculty contributes to the risks with regard to the

institution's alleged human rights violations or armed conflict in public sources (or contribution thereto). If applicable, please also indicate whether an organisational unit other than the one involved in the collaboration harbours risks regarding human rights violations.

- Describe the partner organisation's dependence on and/or independence from the government. Address the organisation's academic autonomy and its ability to act independently of government influence. Less autonomy translates into greater reluctance on the part of VU Amsterdam with regard to collaboration. A ministry or government agency is regarded as being closely intertwined with the government as well as with its actions. Universities and NGOs are regarded as being more independent, unless information indicates otherwise. Consult the [Academic Freedom Index](#) to assess the organisation's academic autonomy and its ability to act independently of government influence. A country score of 0.4 or lower indicates low autonomy.
- Provide details of the freedom of expression in the partner organisation. For example, examine statements by senior management on this topic and the conditions in the country.
- Detail the monetary flows going to the partner in this collaboration.

d. Which mitigating measures can be taken to minimise the risks as far as possible?

Describe the mitigating measures, or safeguards, that can be implemented to minimise the risks referred to as far as possible. These may include preventing/ruling out collaboration with specific parts or sections of the intended partner, defining fail-safes for unwanted developments (e.g. including an opt-out clause in the contract addressing the identified risks), and ensuring that stakeholders are informed of the risks. See the VU Amsterdam website for a list of measures.

Step 3: Decision-making (route 1 and route 2)

Initiators write a consideration and assessment file that follows from the combination of the responses from the previous steps and describes at least the following:

- What is the reason for initiating the collaboration and the activities included therein?
- What risks are associated with the collaboration?
- What safeguards are in place to prevent any contribution being made to armed conflict?

- What safeguards are in place to prevent gross violations of human rights?
- What is your assessment of the collaboration: go or no go?

The risk information may indicate that an organisational unit other than the one directly involved in the collaboration poses a significant risk. For instance, this could be due to an education programme that another

organisational has in collaboration with a ministry of defence, or that it develops a technology that can be used for profiling groups that might be targets of genocide. Another example could be a paediatrics research collaboration with a university where it is suspected that another faculty is contributing to the development of defence technology that will be deployed directly in an existing conflict.

In such cases it is necessary to examine the relationship between this risk and the potential collaboration more closely. If the collaboration is directly tied to a relevant organisational unit, VU Amsterdam's guiding principle will be not to establish the collaboration. If the collaboration is with another part of the organisation, then measures designed to mitigate the risk should be described. For example, a student exchange contract could include conditions that exclude certain parts of the organisation from the exchange, to ensure that VU Amsterdam students do not participate in undesirable activities and to prevent students from those excluded parts from attending VU Amsterdam.

The initiator will discuss the assessment with the line manager and the relevant contact person at the unit level or with the director of operations for the faculty or service department, or the dean (faculties will choose what is appropriate for them). On behalf of the faculty, the director of operations or dean will decide whether a collaboration can take place. For this decision, the Faculty Board may submit the collaboration proposal to the central Advisory Committee for advice (Step 4). If the Executive Board is the authorised signatory, it can seek the advice of the Advisory Committee.

Contact persons will be designated at the unit level to provide support in completing question three. Step 3 will be assessed by the Faculty Board. Subsequently, the Faculty Board may decide whether and under what conditions the collaboration can be entered into or extended. Prior to making a decision, the Faculty Board may seek advice from the central Advisory Committee.

Step 4: Optional advice from the advisory committee (route 1 and route 2)

The Advisory Committee draws up an advisory report, based on the information provided under Step 3, in response to a request from the Faculty Board. The advisory options for potential collaborations are: no objection to establish / can be established with mitigating conditions / cannot be established. For extensions of present collaborations, the advisory options are: can be extended / can be extended with mitigating conditions / do not extend. For ongoing collaborations under changed circumstances, the advisory options are: can be continued / can be continued with mitigating measures / stop.

The advice of the Advisory Committee is shared with the initiator, the Faculty Board and the contact person at the unit level. If the advice is negative, the current or potential partner may be contacted to inform them of VU Amsterdam's concerns and ask for clarification. If new information emerges, this will be considered,

along with the administrative and legal context, in the decision made by the Faculty Board. In the event of a decision in favour of collaboration, the CvB must be informed if the advice is negative. The CvB may ask the Advisory Committee for advice, which will then be addressed to the CvB.

The Committee's advice will be shared with parties directly involved, in line with other topics at VU Amsterdam on which advice is issued. Each year, VU Amsterdam issues an annual report on the application of the Assessment Framework that includes information on the number of cases that have undergone a comprehensive assessment (Step 3 of the Assessment Framework), with aggregated information on types of partners, topics discussed, follow-up steps taken, and how often the advice of the Advisory Committee, if given, is adopted.

3. Process

3.1 University-wide application

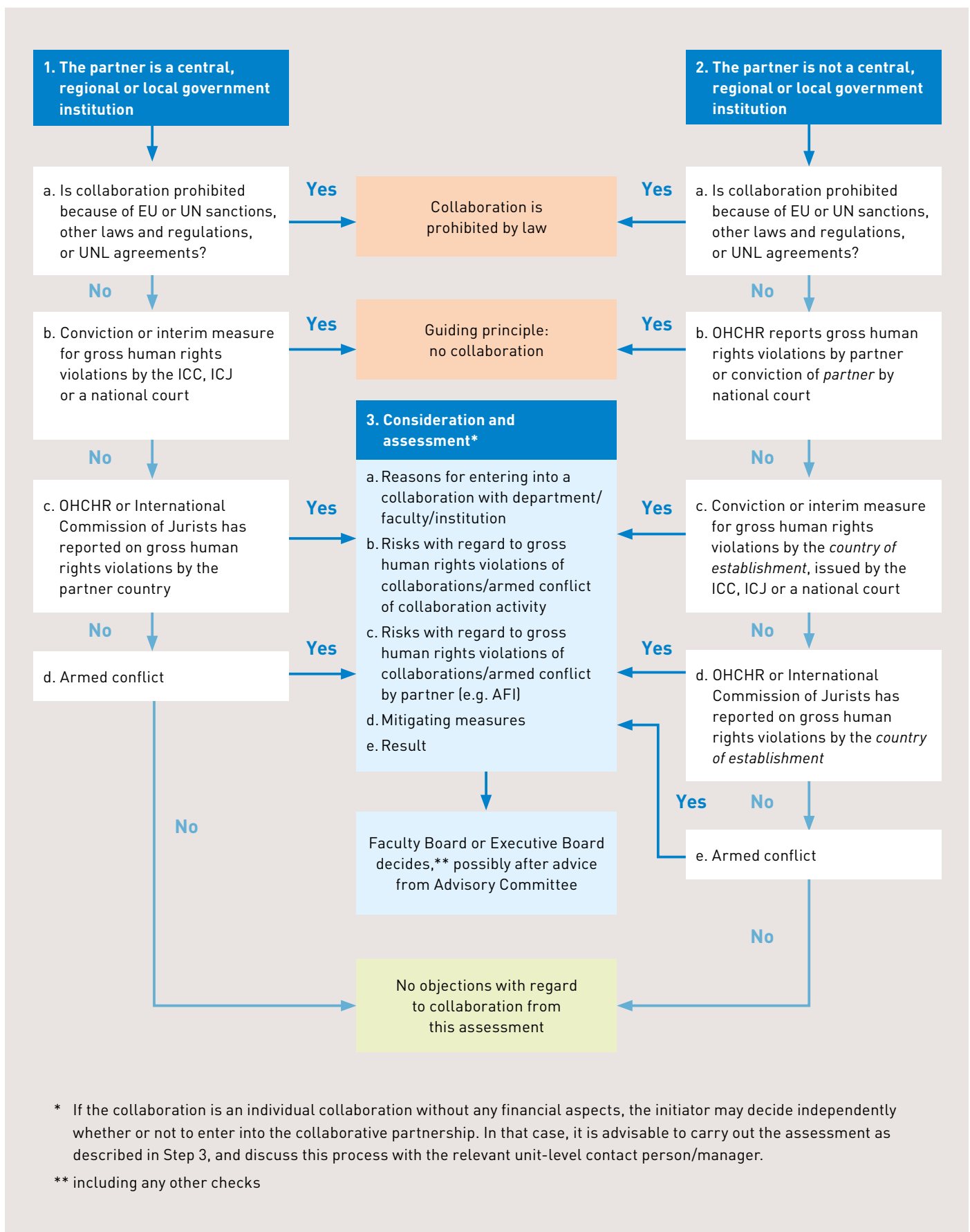
Before this Assessment Framework can be implemented across VU Amsterdam, various prerequisites need to be completed. Regarding support, a structure similar to that for Knowledge Security is envisaged. This is geared towards enabling initiators to take the first steps themselves, with assistance from the faculty or service department (first-line support). In addition, support is organised for the unit-level contact persons (second-line support), and a network is established for mutual knowledge exchange. A central Advisory Committee will be established for this purpose, which can be asked for advice. The following areas of expertise will be represented in this Committee: international law and human rights, ethics, international cooperation, and legal affairs in general. The members will be composed of academic and support staff.

Once first and second-line support have been established and those involved have been trained, the Assessment Framework will be implemented. All university employees will be required to apply the assessment framework

to any new collaborations and those due to be extended. The planned implementation date is 1 September 2025. According to the Framework, the potentially high-risk collaborations that VU Amsterdam currently has will be reviewed in the six months after 1 September. VU Amsterdam will ensure that all policies and supporting documents relating to the Assessment Framework are available on the VU Amsterdam website. In addition, a campaign will be launched to raise awareness of the Assessment Framework and its underlying topics at the university.

The use of the framework will demonstrate whether it needs any additions and adjustments, subject to review at least annually. In this phase, we will also explore whether various assessments at unit level can eventually be integrated into a single process (knowledge security, fossil-free research, academic integrity), or whether this assessment can be added to the knowledge security process as currently organised. The reason for this is that other factors also play a role in the consideration.

Appendix 1: Flow chart



Appendix 2: Fact sheet containing questions about the collaboration partner to enter into search engines

The following questions may be used as search terms in a search engine.
Take a critical view and verify the results, as these may be controversial.

Specific search terms

- Does [the intended partner] contribute to armed conflict?
- Is [the intended partner] involved in the development of arms?
- Is there evidence to support human rights violations by [the intended partner]?
- Are there any suspicions of human rights violations by [the intended partner]?
- Is there evidence to support the presence of soldiers on the campus of [the intended partner]?

General search terms

- Are there any reservations about a collaboration with [the intended partner] from academic viewpoints?
- Are there any reservations about a collaboration with [the intended partner] from human rights perspectives?
- Is there any discussion about the integrity of [the intended partner]?
- Are there any controversial aspects involving [the intended partner]?
- What are some specific points of criticism directed at [the intended partner]?
- Has [the intended partner] been the subject of negative media coverage?

Continue searching based on information discovered.

Sources to consult

International Court of Justice - <https://icj-cij.org/home>
International Criminal Court - <https://www.icc-cpi.int/ichh>
Office of the High Commissioner Human Rights - https://www.ohchr.org/en/ohchr_homepage
Universal human rights index - <https://uhri.ohchr.org/en>
Amnesty International - <https://www.amnesty.org/en/>
Human rights Watch - <https://www.hrw.org/am>
International Service for Human Rights - <https://ishr.ch/>
Scholars at risk - <https://www.scholarsatrisk.org/>
Uppsala Conflict Data Program - <https://ucdp.uu.se/encyclopedia>

International newspapers / media companies
National newspapers / media companies
Website of the intended partner

Appendix 3: Overview of high-risk countries (17 June 2025, see the VU Amsterdam website for the most recent overview)

Countries with interim measures or convictions issued by the ICC or ICJ

- ICC: DR Congo, Philippines, Gaza (Hamas), Israel, Ivory Coast, Kenya, Libya, Myanmar, Sudan
- ICJ: Israel, Myanmar, Russia, United Arab Emirates

Countries for which the OCHCR and/or the International Commission of Jurists has issued a report of gross human rights violations

This list will be available at vu.nl

Countries in conflict according to Today's Armed Conflicts and/or the Global Conflict Tracker

- | | | |
|-----------------------------|--------------|-------------------------|
| • Afghanistan | • Hong Kong | • Niger |
| • Armenia | • India | • Nigeria |
| • Azerbaijan | • Indonesia | • Noord-Korea |
| • Brunei | • Iraq | • Ukraine |
| • Burkina Faso | • Israel | • Pakistan |
| • Central African Republic | • Yemen | • Palestine territories |
| • Chad | • Cameroon | • Russia |
| • Colombia | • Kenia | • Senegal |
| • Democratic Republic Congo | • Lebanon | • Somalia |
| • Egypt | • Libya | • South-Sudan |
| • El Salvador | • Malaysia | • Sudan |
| • Ethiopia | • Mali | • Syria |
| • Philippines | • Marocco | • Taiwan |
| • Georgia | • Mexico | • Turkey |
| • Guatemala | • Moldavia | • Venezuela |
| • Haiti | • Mozambique | • Vietnam |
| • Honduras | • Myanmar | • Western Sahara |

Colophon

The assessment framework for risks related to armed conflicts and human rights in international collaborations has been drawn up by a project team commissioned by the Executive Board of VU Amsterdam.

Design

Haagsblauw commissioned by VU Designstudio

Photography

Too van Velzen

Version 2.0: 24 June 2025