

## Introduction

There are now more than 100,000 United Nations (UN) uniformed peacekeeping personnel deployed around the world in missions that have legal authority from the Security Council, under Chapter VII of the UN Charter, to use force to protect civilians (POC).<sup>1</sup> Although such mandates have been given to missions since 1999, POC has only become a central task in more recent years. Its emergence poses challenges to the development of international law that are as significant as the original concept of UN peacekeeping itself. Armed soldiers are being given legal permission to enter the territory of other States and protect people from certain grave violations of international human rights and humanitarian law. The UN has stated that they are ‘legally required’ to ‘use force, including deadly force’ to fulfil this mandate.<sup>2</sup> This raises two inter-linked questions: first of all, what gives the Security Council the right to offer such protection; and, secondly, what is the nature of the obligation on the mandated mission to provide it.

The UN Charter prohibits both the unilateral use of force and interference in the internal affairs of individual States, even by the UN itself.<sup>3</sup> The use of force is only permissible, under the Charter, in self-defence or when it has been authorized by the Security Council, in response to threats to international peace and security.<sup>4</sup> Although it is increasingly accepted that humanitarian crises and situations of internal armed conflict can constitute

<sup>1</sup> *Surge in Uniformed UN Peacekeeping Personnel from 1991 present*, on July 31, 2016. This gives a total of 100,746 uniformed personnel (85,808 troops, 13,200 police, and 1,738 military observers); available at [www.un.org/en/peacekeeping/documents/bnoteo716.pdf](http://www.un.org/en/peacekeeping/documents/bnoteo716.pdf), accessed November 1, 2016.

<sup>2</sup> *Evaluation of the implementation and results of protection of civilians mandates in United Nations peacekeeping operations*, Report of the Office of Internal Oversight Services, UN Doc A/68/787, 7 March 2014, [Hereinafter OIOS Protection Evaluation 2014], para 15.

<sup>3</sup> UN Charter, Article 2.

<sup>4</sup> UN Charter Article 51 and Articles 39–42.

such threats, this is a recent development and has been accompanied by growing concern about the lack of accountability surrounding such decisions, given the powers that they confer to the Security Council. POC mandates also blur the previous distinction between the ‘core principles’ of traditional peacekeeping, including minimum use of force, and Chapter VII ‘peace enforcement’ operations.

A Chapter VII mandate provides a UN mission with the *jus ad bellum* authority to use force, but it is silent on the rules that would govern the resulting actions. These must be found either in the *jus in bello* provisions of International Humanitarian Law (IHL) or in the regulations on the use of force contained in international human rights law.

Most of the existing guidance provided by the UN appears to be based on the assumption that IHL will be the appropriate legal framework for missions with POC mandates. The UN *Infantry Battalion* of 2012, for example, authorizes peacekeeping soldiers to use lethal force ‘in *any circumstance* in which *they believe* that a threat of violence against civilians exists’ [emphasis added] and a threat is considered ‘imminent’ from ‘the time it is identified as a threat, until such a time the mission can determine that the threat no longer exists’.<sup>5</sup> Guidance issued in 2015 repeats this formulation and also draws heavily on IHL language on the importance of ‘principles of distinction between civilians and combatants, proportionality and the requirement to avoid and, in any event, minimize collateral damage’, while also stressing the need to abide by customary international human rights law and that ‘deadly force’ should only be used as a last resort.<sup>6</sup>

As discussed further in Part II of this book, under IHL the military are permitted to kill – or capture – enemy combatants and may even inflict harm on civilians when attacking military targets so long as they apply criteria such as distinction and proportionality. By contrast, international human rights law provides extensive protections against arbitrary killings and deprivations of liberty. Lethal force can only be used when strictly necessary, as a last resort, for specified purposes, and people may only be deprived of their liberty on certain specific grounds, with detailed guarantees concerning their rights in detention to protect them, in particular, against torture and other forms of

<sup>5</sup> UN *United Nations Infantry Battalion Manual Volume I*, Department of Peacekeeping Operations / Department of Field Support, August 2012 [Hereinafter UN Infantry Battalion, Vol. I, 2012], para 6.4.3.

<sup>6</sup> *Policy on the Protection of Civilians in United Nations Peacekeeping*, Department of Peacekeeping Operations / Department of Field Support Ref. 2015.07, 1 April 2015, pp. 5–6. See also *Protection of Civilians: Implementing Guidelines for Military Components of United Nations Peacekeeping Missions*, Department of Peacekeeping Operations / Department of Field Support, February 2015, p. 15.

ill-treatment. International human rights law also imposes positive obligations on the appropriate authorities to prevent, investigate and punish grave violations of the rights it protects and provide redress to those who have suffered, even when the violations are carried out by private persons or entities. The lack of an effective investigation could itself be a violation of the protections provided in the right to life and protections against ill-treatment.

In 1999, the same year that the UN Security Council gave its first POC mandate to a peacekeeping operation, the UN secretary-general issued a Bulletin stating that:

The fundamental principles and rules of international humanitarian law ... are applicable to UN forces when in situations of armed conflict they are actively engaged therein as combatants, to the extent and for the duration of their engagement. They are accordingly applicable in enforcement actions or in peacekeeping operations when the use of force is permitted in self-defence.<sup>7</sup>

There is no similar Bulletin on the applicability of international human rights law to UN peacekeeping missions. Given the widespread criticism of UN peacekeeping missions with POC mandates for their current reluctance to use force to protect civilians against physical harm even when they consider themselves to be operating within an IHL framework, it might seem counter-intuitive to wish to constrain them to the more restrictive provisions of international human rights law. It will nevertheless be argued here that this will usually provide a more appropriate framework in which to interpret their 'protective' responsibilities and far clearer guidance on the use of force for protective purposes.

It is clearly impossible for peacekeeping soldiers deployed in a conflict, or post-conflict, environment to provide protection against *all* threats of violence to *all* people at *all* times. Threats to civilians are likely to come from a wide range of sources in such situations and take a variety of forms.<sup>8</sup> Nevertheless, international human rights jurisprudence does contain fairly clear guidance

<sup>7</sup> Secretary General's Bulletin, *Observance by UN Forces of International Humanitarian Law*, ST/SGB/1999/13, 6 August 1999 [Hereinafter, Secretary General's Bulletin on IHL 1999].

<sup>8</sup> The protection of women from conflict-related sexual violence (CRSV) is understood to be part of a POC mandate, but the extent to which UN troops are authorized to protect women against 'private' as opposed to 'public' forms of violence raises issues which go beyond the scope of this book adequately to explore. For further discussion of CRSV, see, for example, *Report of the Secretary-General on Conflict-Related Sexual Violence*, S/2015/203, 23 March 2015. See also UN Security Council Resolutions 1325 of 31 October 2000, 1820 of 19 June 2008, 1888 of 30 September 2009, 1889 of 5 October 2009, 1960 of 16 December 2010, 2122 of 18 October 2013, and 2106 of 24 June 2013 on women and peace and security; and Resolution 1314 of 11 August 2000 on the need to provide special protection for children in armed conflict.

as to how the ‘positive obligation’ to protect the right to life and physical integrity should be interpreted by States. The European Court of Human Rights has observed that:

Bearing in mind the difficulties in policing modern societies, the unpredictability of human conduct and the operational choices which must be made in terms of priorities and resources, the positive obligation must be interpreted in a way which does not impose an impossible or disproportionate burden on the authorities. Accordingly, not every claimed risk to life can entail for the authorities a Convention requirement to take operational measures to prevent that risk from materialising. For a positive obligation to arise, it must be established that the authorities knew or ought to have known at the time of the existence of a real and immediate risk to the life or failed to take measures within the scope of their powers which, judged reasonably, might have been expected to avoid that risk.<sup>9</sup>

It will be argued here that POC is best understood in similar terms. It should be seen as a positive obligation to protect people from threats to their rights to life and protection against ill-treatment, while respecting – that is, not infringing – these rights in the process. Using this interpretation, a positive obligation could be deemed to arise if a peacekeeping mission knew, or ought to have known at the time, of the existence of a real and immediate risk to civilians and failed to take measures within the scope of its powers which, judged reasonably, might be expected to have avoided or ameliorated the risk.

These obligations are firmly rooted in international human rights law and will be discussed in more detail in Chapter 4 of this book. It will be argued that the safeguards contained in this legal framework could be interpreted in ways that do not impose impossible or disproportionate burdens on UN peacekeeping missions. Its guidance is both relevant and potentially applicable to missions and provides a standard against which the conduct of missions should be judged. The extent to which the UN considers its operations to be bound by these provisions, however, is much less clear and this will be discussed further in Chapter 5.

Most international legal scholars agree that international human rights law applies to the UN in some manner. Megret and Hoffman suggest that there are three different ways in which the UN could be bound by human rights obligations: through customary law (an external conception), by its obligation under the Charter to promote human rights (an internal conception), and

<sup>9</sup> ECtHR *Mahmut Kaya v. Turkey*, Appl. No. 22535/93, Judgment 28 March 2000, para 86. See also *Osman v. UK*, Appl. No. 23452/94, Judgment 28 October 1998, paras 115–116.

by virtue of its members' own human rights commitments (a hybrid conception).<sup>10</sup> Verdirame argues that 'much – probably most – human rights law binds the UN and other international organisations' while acknowledging that 'some confusion persists about particular aspects' of its application.<sup>11</sup> Sheeran and Bevilacqua maintain that, at the very minimum, human rights constitute an interpretive constraint with respect to UN Security Council decisions, and that the real debate is about the extent of these obligations on the Council while exercising its powers to preserve international peace and security.<sup>12</sup>

There are also a growing number of recent UN resolutions, reports, and policy documents that refer to the relevance of international human rights law to the work of the Organization<sup>13</sup> and an increasing number of references to international human rights law in the policy guidance provided to peacekeeping missions with POC mandates.<sup>14</sup> In 2013 the UN adopted a Human Rights due Diligence Policy (HRDDP), which acknowledges that the UN has a 'responsibility to respect, promote and encourage respect for international humanitarian, human rights and refugee law'.<sup>15</sup> It also launched a Human Rights Up Front (HRUF) initiative, which states that 'human rights and the protection of civilians' should be seen as a 'system-wide core responsibility' and that the UN should 'take a principled stance' and 'act with moral courage

<sup>10</sup> Frederic Megret & Florian Hoffman, 'The UN as a Human Rights Violator? Some Reflections on the UN's Changing Human Rights Responsibilities' (2003) 25(2) *Human Rights Quarterly*, pp. 314–334.

<sup>11</sup> Guglielmo Verdirame, *Who Guards the Guardians? UN Accountability for violations of Human Rights*, Cambridge: Cambridge University Press, 2011, pp. 89 and 1.

<sup>12</sup> Scott Sheeran and Jaqueline Bevilacqua, 'The UN Security Council and International Human Rights Obligations: Towards a New Theory of Constraints and Derogations,' in Scott Sheeran and Nigel Rodley (eds.), *Routledge Handbook of International Human Rights Law*, London: Routledge, 2013, pp. 371–402.

<sup>13</sup> *United Nations Peacekeeping Operations, Principles and Guidelines (Capstone Document)*, New York: Department of Peacekeeping Operations, 2008, p. 60; *We Are United Nations Peacekeepers*, New York: United Nations Department of Peacekeeping Operations Training Unit, undated; See also: UN Office for the Coordination of Humanitarian Affairs, *Security Council Norms and Practice on the Protection of Civilians in Armed Conflict: Analysis of Normative Developments in Security Council Resolutions 2009–2013*, OCHA, 2014.

<sup>14</sup> See, for example: DPKO/DFS *Policy on the Protection of Civilians in United Nations Peacekeeping*, Ref. 2015.07, 1 April 2015; *Protection of Civilians: Implementing Guidelines for Military Components of United Nations Peacekeeping Missions*, Department of Peacekeeping Operations / Department of Field Support, February 2015; OCHA, UN Office for the High Commissioner of Human Rights and the UN High Commissioner for Refugees, *The Protection of Human Rights in Humanitarian Crises*, Geneva: OHCHR/UNHCR, 8 May 2013; and OHCHR/DPKO/DPA/DFS *Policy on Human Rights in United Nations Peace Operations and Political Missions*, Ref. 2011.20, 1 September 2011.

<sup>15</sup> *Human Rights Due Diligence Policy on United Nations Support to Non-United Nations Security Forces*, UN Doc. A/67/775-S/2013/110, 5 March 2013, para 1 [Hereinafter Human Rights Due Diligence Policy 2013].

to prevent serious and large-scale violations.<sup>16</sup> The UN has yet, however, to produce comprehensive guidance on how the negative and positive obligations of international human rights law surrounding the use of force apply to UN peacekeeping missions, to ensure that this is fully integrated into the training and direction of its personnel and to create mechanisms by which it can be held to account under these provisions.

As will be discussed in the final section of this book, UN missions mandated to protect civilians have repeatedly failed to do so and internal inquiries, and ‘lessons learned’ reports have often identified failures of both management and political leadership. Missions have also failed to investigate fully and speak out against violations, particularly when these are committed by, or with the acquiescence of, government forces in the host State. In some cases missions have been complicit in these violations by providing support to the forces that committed them. Yet it was not until November 2016 that the UN sacked a Force Commander for failing to protect civilians,<sup>17</sup> and there are very few cases where the UN has initiated disciplinary action against senior mission or headquarters staff for failing to carry out POC mission mandates. Mechanisms need to be created to improve the accountability of UN missions to those that they are responsible for protecting and to provide redress for victims of violations.

Individual States contributing troops to UN missions have already faced legal challenges for actions, or inactions, which resulted in violations of the right to life. Both Dutch and Belgian courts have upheld claims that their troops on UN peacekeeping missions in the 1990s failed to protect some of the victims of the genocides in Rwanda and Srebrenica.<sup>18</sup> Challenging individual troop-contributing countries (TCCs) for alleged violations, however, could lead to a potential crisis in peacekeeping, because States that are party to strong regional human rights mechanisms, or with strong domestic human rights accountability, may become even more reluctant to participate in such missions. There will also be many cases in which it is the UN itself, through its actions or inactions, that is responsible for a human rights violation. This book argues, instead, that the UN should issue a Secretary General’s Bulletin acknowledging the applicability of international human rights law

<sup>16</sup> UN News Centre, New UN ‘Rights up Front’ strategy seeks to prevent genocide, human rights abuses, 18 December 2013.

<sup>17</sup> BBC News, ‘UN sacks South Sudan peacekeeping chief over damning report,’ 1 November 2016. See also *Independent Special Investigation into the violence which occurred in Juba in 2016 and UNMISS response*, 1 November 2016.

<sup>18</sup> *Mothers of Srebrenica v. the Netherlands* ECLI:NL:RBDHA:2014:8748 (The Hague District Court) 2014; and *Mukeshimana-Ngulinzira and Others v Belgium and Others*, Court of First Instance Judgment, RG No 04/4807/A, 07/15547/A, ILDC 1604 (BE 2010) 8th December 2010.

to its peacekeeping missions and setting out the obligations that this entails. Monitoring mechanisms should also be established, which could receive individual complaints and issue advisory opinions on the compliance of missions with these obligations.

If it is accepted that UN peacekeeping missions do have “protection” obligations under international human rights law, however, it will be important to clarify the extent of these and which rights missions should consider themselves responsible for protecting. Human rights are often declared to be ‘universal, indivisible and interdependent and interrelated’.<sup>19</sup> There are a number of both civil and political rights and economic, social, and cultural rights that will be of obvious relevance during the type of humanitarian crises in which UN peacekeeping missions often operate. Indeed it has been argued that ‘human rights protection cannot and must not be reduced to protection against violence and oppression, against death or torture, but always has to be protection against basic deprivation like hunger, sickness or lack of shelter’.<sup>20</sup> This poses the question as to whether a UN peacekeeping mission with a POC mandate should consider itself responsible for protecting the full spectrum of all the rights and freedoms contained in the corpus of international human rights law, or if a narrower set of ‘core’ obligations can be derived from the ‘purposes, functions and practices’ of the mission and an assessment of its ‘effective control’.

At the end of the 1990s, a series of workshops organized under the auspices of the International Committee of the Red Cross (ICRC) defined ‘protection’ as

all activities, aimed at obtaining full respect for the rights of the individual in accordance with the letter and the spirit of the relevant bodies of law (i.e. human rights, humanitarian and refugee law). Human rights and humanitarian actors shall conduct these activities impartially and not on the basis of race, national or ethnic origin, language or gender.<sup>21</sup>

The UN has developed a similar definition.<sup>22</sup> This is often referred to as humanitarian ‘rights-based’ protection. Its all-encompassing description

<sup>19</sup> *Vienna Declaration and Programme of Action*, Adopted by the World Conference on Human Rights in Vienna on 25 June 1993. See also *What Are Human Rights?*, OHCHR website, [www.ohchr.org/en/issues/pages/whatarehumanrights.aspx](http://www.ohchr.org/en/issues/pages/whatarehumanrights.aspx), accessed 27 October 2014.

<sup>20</sup> Sylvia Maus, ‘Human Rights in Peacekeeping Missions’, in Hans-Joachim Heintz and Andrej Zwitter (eds.), *International Law and Humanitarian Assistance*, Berlin: Springer, 2011, p. 112.

<sup>21</sup> ICRC *Strengthening Protection in War: A Search for Professional Standards*, Geneva: International Committee of the Red Cross, 2001.

<sup>22</sup> The UN Office for the Coordination of Humanitarian Affairs (OCHA) in its *Glossary of Humanitarian Terms: In Relation to the Protection of Civilians in Armed Conflict*, OCHA, December 2003, chapter 4: The Field. This defines protection as: ‘A concept that encompasses all activities aimed at obtaining full respect for the rights of the individual in accordance with the letter and spirit of human rights, refugee and international humanitarian law. Protection

is intended to emphasize that humanitarian actors have responsibilities to ensure that their work does not harm those they are trying to help. It clearly obliges humanitarian agencies to remain impartial and not to discriminate.<sup>23</sup> The wording, however, suggests an aspirational, rather than legal, commitment, and humanitarian agencies themselves appear to disagree about how it should be interpreted.

The term ‘protection’ is often also associated with the ‘responsibility to protect’ (R2P) although, as will be discussed in Chapter 1 of this book, this is a political rather than a legal concept. There are few references to POC in the existing academic literature and, where it is mentioned, it is often treated either as an ‘operationalization’ of R2P or else viewed through the humanitarian ‘rights-based’ lens.<sup>24</sup> This is partly because it is still a comparatively new concept and partly because POC mandates have mainly developed and adapted in the field ‘below the radar’ of much of the current legal and academic discourse.

#### PURPOSE AND STRUCTURE OF THIS BOOK

This book was written for those involved in the nexus between the development of UN peacekeeping and the protection of civilians under international law. It is intended to be accessible to non-lawyers working in the field who

involves creating an environment conducive to respect for human beings, preventing and/or alleviating the immediate effects of a specific pattern of abuse, and restoring dignified conditions of life through reparation, restitution and rehabilitation.’ See also 2015 *Strategic Response Plan, Syrian Arab Republic*, UN Country Team, December 2014, p. 3, which states that “‘protection” refers to the protection of all affected civilians including men, women, children, and other groups with specific needs from violence, exploitation, discrimination, abuse and neglect.’

<sup>23</sup> See ICRC, *Professional Standards for Protection Work Carried Out by Humanitarian and Human Rights Actors in Armed Conflict and Other Situations of Violence*, Geneva: International Committee of the Red Cross, October 2009; IASC, *Growing the Sheltering Tree, Protecting Rights through Humanitarian Action*, Geneva: Inter-Agency Standing Committee, 2002; GPC, *Handbook for the Protection of Internally Displaced Persons*, Global Protection Cluster Working Group, Geneva: December 2007; Sophia Swithern and Rachel Hastie, *Improving the Safety of Civilians: A Protection Training Pack*, Oxford: Oxfam, December 2008.

<sup>24</sup> The former is an underlying assumption of Siobhán Wills, *Protecting Civilians*, Oxford: Oxford University Press, 2009; Edward Luck, ‘The Responsibility to Protect: Growing Pains or Early Promise?’ *Ethics and International Affairs* Vol. 24 Issue 4, September 2010; and Nicholas Tsagourias, ‘Self-defence, protection and humanitarian values and the doctrine of impartiality and neutrality in enforcement mandates’, in Marc Weller (ed.), *The Oxford Handbook on the Use of Force in International Law*, Oxford: Oxford University Press, 2014. The latter view informs the treatment of the chapter on Protection of Civilians in Alex Bellamy and Paul Williams, *Understanding Peacekeeping*, Second Edition, Polity Press, 2011, pp. 337–58.



may need to know the applicable legal standards relating to issues such as the use of force and arrest and detention powers on the one hand and the delivery of life-saving assistance according to humanitarian principles on the other. It is hoped that it will also be of interest to scholars and students of peacekeeping, international law and international relations who may be less aware of some of the practical dilemmas facing those trying to operationalise the various conceptions of ‘protection’ during humanitarian crises in recent years. Finally, it is written for advocacy purposes, arguing that the positive obligations contained in international human rights law jurisprudence in relation to the right to life and protection against ill-treatment may provide appropriate interpretive guidance to UN peacekeeping missions with POC mandates.

The latter claim is controversial and could not have been credibly advanced at all until comparatively recently. This is testament to the growing influence of international human rights law in providing ‘protection’ to people in conflict zones, which has, in turn, touched on my own personal and professional life, spanning many of the legal developments discussed in this book. I grew up in an Irish family in Britain during what is often referred to as ‘the troubles’ in Northern Ireland. Several of my friends were killed during this, and it provided me with my first practical experience of what were to become landmark cases related to the rights to life, liberty and protection against torture at the European Court of Human Rights. I worked at Liberty, a British non-governmental organization (NGO), in the early 1990s and then moved to Amnesty International UK where I had responsibility for our Section’s work on combating impunity during the extradition case against August Pinochet, the former dictator of Chile. This coincided with the Kosovo crisis of 1999, and I first visited the province during the conflict to deliver training seminars on international human rights law in refugee camps on behalf of the Council of Europe. The following year I was seconded into the UN High Commissioner for Refugees (UNHCR) as a Protection Officer based in Pristina.

As discussed in Chapters 1 and 2 of this book, the North Atlantic Treaty Organization (NATO) took military action in Kosovo without explicit UN Security Council authority, and a UN mission was then established that exercised executive powers over the territory. Both of these decisions raised very obvious important issues related to legality and accountability for those of us working there at the time. I was in Kosovo on 11 September 2001, at the time of the terrorist attacks in the United States, and I subsequently went to Afghanistan where I spent a year and a half setting up and managing legal aid clinics for Afghan refugees and Internally Displaced Persons (IDPs) trying to return to their homes. Between 1999 and 2009 I worked in more than twenty-five conflict and post-conflict zones for a variety of UN and NGO

human rights and humanitarian organizations, mainly on issues related to legal reform, land rights and ‘protection’. My last mission was to Sri Lanka during the brutal closing months of the war that ended in May 2009 and in which tens of thousands of civilians are believed to have been killed. My son was born a few months after I left the country, and this marked the end of my time as a full-time humanitarian field worker.

As discussed further in Chapter 3 of this book, my decade in the field coincided with the emergence and development of POC as a new normative concept. To mark the tenth anniversary of the Security Council’s first POC mandate to the UN mission in Sierra Leone, the UN Department of Peacekeeping Operations (DPKO), together with its Office for the Coordination of Humanitarian Affairs (OCHA), commissioned an independent study on the drafting, interpretation and implementation of these mandates. *Protecting Civilians in the Context of UN Peacekeeping Operations* was a landmark study and contained a series of recommendations to increase the effectiveness of these missions.<sup>25</sup> One of these was for the development of a series of scenario-based exercises on POC to be undertaken by all mission staff prior to their deployment. I was contracted by DPKO to design the first set of exercises in 2010 and 2011, and the following year I was re-hired to prepare mission-specific material for the UN Organization Stabilization Mission in the Democratic Republic of the Congo (MONUSCO), the UN Organization in Cote d’Ivoire (UNOCI), the UN Mission South Sudan (UNMISS) and the UN/AU Mission in Darfur (UNAMID).

A draft of our first set of our exercises was discussed at a seminar held in the UN’s regional support Centre in Entebbe, Uganda, in March 2011, attended by representatives of all the UN and African Union (AU) peace operations in Africa. The seminar coincided with the UN Security Council meeting that authorized the use of force to protect civilians, under Chapter VII, in response to the humanitarian crisis in Libya. Representatives of UNOCI at the seminar also warned of the rapidly deteriorating situation that would lead to the UN also authorizing a forceful action in Côte d’Ivoire under its POC mandate a few weeks later. As discussed further in Chapter 1, the combined impact of these two operations led to considerable discussion regarding the *jus ad bellum* and *jus in bello* rules relating to the use of force and the relationship between peacekeeping and peace enforcement operations.

I spent much of 2012 working with the field and headquarters staff of MONUSCO, UNOCI, UNMISS and UNAMID. I was in Goma, in the

<sup>25</sup> Victoria Holt and Glynn Taylor *Protecting Civilians in the Context of UN Peacekeeping Operations*, DPKO and OCHA, 2009.