

II BOLOGNA EXPERT ROUNDTABLE

**LOCAL AND REGIONAL GOVERNMENTS IN THE
UNIVERSAL PERIODIC REVIEW
DATA, DIGITAL TOOLS, AND MULTI-LEVEL GOVERNANCE**

SUMMARY AND GUIDANCE NOTE

Local and Regional Governments in the Universal Periodic Review

Data, Digital Tools and Multi-Level Governance

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Introduction

This Summary and Guidance Note originates from the II Bologna Expert Roundtable on Local and Regional Governments in the Universal Periodic Review, held on the 23 of April 2026, and organised by the University of Bologna Department of Legal Studies and the Geneva Human Rights Hub (GHRH), together with the Italian Interministerial Committee for Human Rights (CIDU) and the Unit for Analysis, Programming, Statistical and Historic Documentation of the Ministry of Foreign Affairs and International Cooperation of Italy.

The second Bologna Expert Roundtable built on a trajectory opened in 2024. ‘Bologna I’ served as a pillar: it established a constructive dialogue between national mechanisms for

implementation, reporting and follow-up (NMIRFs) and local and regional governments (LRGs), highlighting that effective human rights implementation increasingly depends on robust, coordinated data systems. Bologna I placed the planning and collection of data at the centre, as instruments for a truly effective implementation of international human rights obligations. ‘Bologna II’ represented a natural step further, consolidating that trajectory by turning to the role of local and regional governments in the implementation of human rights recommendations.

This consolidation did not come in a vacuum. To the contrary, it found its premises in Human Rights Council resolutions 51/33 and 57/12, which reinforced the mandate of NMIRFs, and in parallel opened a new space for the formal recognition of LRGs as central actors in the implementation of human rights standards.

LRGs are at the front line of human rights and Sustainable Development Goals implementation, and yet, their systemic involvement in international monitoring mechanisms, including the Universal Periodic Review (UPR) – the principal peer-review mechanism of the Human Rights Council – is still in its early stages.

The premise upon which Bologna II built is that the engagement of local and regional governments in the international human rights monitoring system is a condition for the effectiveness of the system itself. It constitutes a further step in the broader, ongoing process at the international level of incorporating relevant human rights domestic actors in the system. In this sense, local and regional governments are not considered mere executors of national directives. They are actors with their own political identity and legislative and administrative competences in an array of fields – from education to housing, from health to social protection, from the environment to the care of persons with disabilities – that directly affect the realisation of rights on the ground. They are, as well, bearers of irreplaceable institutional knowledge; holders of disaggregated data that illuminate inequalities often concealed within national averages. In short, their incorporation as structural components of the human rights monitoring system is necessary as local input is required for the accuracy of the review, and local ownership for its effectiveness.

In addition to the consideration of how LRGs role in the UPR can be strengthened through a multi-level model of governance, the Roundtable took into account the digital transformation that is reshaping governance practices and monitoring *per se*. Digital human rights tracking tools, digital dashboards and data management platforms can enhance the capacity to collect, manage and process data. And while it is understood that digital tools are not alone sufficient to compensate for other barriers that hinder LRGs' engagement – including institutional, methodological, political and financial ones – the digital dimension cannot be disregarded when the objective is to provide operational solutions for the facilitation of LRGs participation in the UPR cycle.

One concrete project idea subsequently developed from these discussions is an integrated tracking and data system for LRGs, designed around local planning and delivery needs and able to connect, where useful, with national and international frameworks. Its potentially transformative feature is the change in workflow it would enable. Instead of reconstructing local evidence at the end of each review cycle, an LRG could maintain a continuously updated record of actions, responsibilities, progress and supporting evidence. The same record could support day-to-day management and, through clearly defined mappings, feed engagement with NMIRFs, the UPR and other UN human rights mechanisms, as well as Voluntary Local Review and Voluntary National Review processes. Reporting would become an output of implementation rather than a separate exercise. The full concept note, developed following the Roundtable, is reproduced in Annex I.

With the participation of national authorities, NMIRFs, representatives from local and regional governments, international organizations and academic experts, the Second Bologna Expert Roundtable was concerned with addressing the question of how can Local and Regional Governments be systematically integrated into the UPR cycle through localized data, digital tools and structured multi-level governance models.¹ The present

¹ Participants to the II Bologna Expert Roundtable: Moujahid Abaddi, Ministry of Justice of the Kingdom of Morocco; Ciro Bonajuto, Regione Campania; Ashley Bowe, SPC – Pacific Community; Federico Casolari, University of Bologna; Ludovica Chiussi Curzi, University of Bologna; Martha Davis, Northeastern University; Alexandra Devoy, Scottish Government; Martina Di Piazza, Avvocatura Udine; Adrià Duarte, UCLG; Anh-Thu Duong, Global Cities Hub; Timo Franz, IMPACT OSS; Giovanni Battista Iannuzzi, Interministerial Committee for Human Rights – Ministry of Foreign Affairs and International Cooperation of Italy; Artur Iatsevykh, OHCHR; Jongjin Kim, Permanent Mission of the Republic of Korea

document aims at synthesising the main insights from the Roundtable, including practical approaches to strengthening the engagement of LRGs in UPR implementation, reporting and follow-up.

The summary's structure reflects the subdivision of the event's sessions. The guidance note elaborates in the form of recommendations the main insights emerging from the discussions held.

Summary

1. The UPR Cycle and the Role of LRGs

Throughout the cycle of the Universal Periodic Review, local and regional governments can play a relevant role in different phases. Those where they are considered to be able to add the greatest value to the process are the preparation of the national report and the implementation of, and follow-up to, UPR recommendations.

As anticipated above, LRGs are the level of government closest to the people, with relevant powers for the realisation of human rights on the ground. This also makes them the level of government with more direct access to disaggregated human rights data, on which monitoring processes should unfold, but that State-centered reporting might not as easily capture. Thus, their engagement supplies an invaluable source of accuracy in the assessment of the impact of human rights policies on the ground underlying the preparation of the national report.

Moreover, LRGs are indispensable partners in translating recommendations into concrete policies and measurable outcomes. While the powers they are recognised vary across the different constitutional settings, as a result of decentralisation trends it is recognised that

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implementation of a vast part of human rights recommendation intersects LRGs' sphere of authority.

Relevant practice is emerging on ways through which LRGs engagement within the UPR process can take place, and a prominent role is played in these regards by NMIRFs. As the mechanism that coordinate domestic efforts with respect to the monitoring system, NMIRFs are in a particularly well-suited position to facilitate the structural involvement of LRGs in the UPR and ensure multi-level cooperation among relevant domestic actors. Just with regards to what emerged at the Roundtable, LRGs are included in the composition of the Italian Interministerial Committee for Human Rights; they participate in the NMIRF of Morocco; and they have recently become observers in the NMIRF of Portugal.

More in particular from the experience of Morocco and its NMIRF, LRGs are asked to contribute to the national report by submitting their data and are consulted in the drafting phase, with an effort to value the data that they already collect in the exercise of their mandates to avoid overburden through the creation of parallel reporting procedures. In the implementation and follow-up phase, the NMIRF undertakes a significant role in filtering recommendations and information coming from the review, so that local authorities are not merely informed of the recommendations that concern them, but are actively associated with their implementation, with particular attention paid to breaking recommendations down into terms and indicators that are actionable and comprehensible at the local level, and to framing requests for information in a way that helps local actors understand what is being asked and how their work contributes to implementation. Importantly, the NMIRF cooperates in its work with central authorities that already supervise or work with local authorities, and in coordination with the national bodies competent with SDGs reporting to link UPR follow-up with existing public policies, local development plans and SDG monitoring system. Additional practical measures through which the NMIRF facilitates engagement of LRGs are the creation of simplified reporting templates and toolkits for local actors, the integration of local indicators into national monitoring systems, and the organisation of regular awareness-raising and capacity-building activities.

In Portugal, since early 2025 LRGs engagement with the NMIRF has been formalized by recognising the National Assemble of Portuguese Municipalities ('ANMP') the observer status, along with the national parliament, the Attorneys General Office, and the Ombudsperson. This important institutional step forward testimonies Portugal's commitment to adopt a whole of society and whole of government approach to monitoring. ANMP represents all 308 Portuguese municipalities and plays a central role in promoting and defending local government interests, both nationally and internationally. Although observers do not have voting rights, they participate in plenary meetings, they contribute to discussions, and they are evolving in equal footing in the exchange of information.

Different challenges, however, emerge as well and need to be addressed. In some States, there is lack of interest in the involvement of LRGs in the phases of the UPR, whether for political reasons or merely for a general indifference towards these levels of government and the contribution they would make to the process: human rights tend to be perceived as primarily a national government or civil society concern rather than a whole-of-government priority, so that local governments receive no top-down mandate or incentive to engage. This lack of interest is often not unilateral: LRGs themselves are not always convinced of the value of engaging with a mechanism that can appear distant, technical, and disconnected from local priorities; elected local officials are often required to prioritise measures that most directly secure public support, which can limit the appeal to dedicate resources for the engagement in international monitoring processes whose benefits are not always immediately visible. More fundamentally, LRGs often lack awareness and knowledge of human rights. All this points to the continued need for advocacy addressed both at national governments and at LRGs, to frame engagement in the UPR as an opportunity to secure support in discharging their functions, rather than as an additional burden.

Even where political will exists, structural and administrative constraints remain. The exclusion of LRGs in State monitoring structures and non-inclusive institutional design preclude a meaningful and systematic engagement of local and regional authorities in upstream monitoring processes, which in turns results into an unstable and discontinuous flow of information and in wider human rights data fragmentation. Furthermore, even when LRGs are provided a mandate and are formally included in States' monitoring structures, engagement in the process requires relevant arrangements also at a more

operative level. LRGs often lack actionable guidance as to relevant human rights data they are expected to feed into the process and as to the concrete tasks associated with the implementation of specific recommendations: without indicators and assessment tools that translate international recommendations into terms that are meaningful at the local level, LRGs may simply not know what is being asked of them.

Cutting across all these challenges, LRGs very often lack institutions, personnel and resources to fulfil meaningfully their mandate, and moreover there may be important differences in institutional and financial capacities across LRGs in the same State. The lack of financial resources is an impediment to continuous and sustained dialogue in all the phases of the monitoring process and across cycles. In addition, changes in local political leadership can disrupt the continuity of representation and engagement over time.

Facing these challenges, reflection on how digital tools and models of multi-level governance can support LRGs' engagement in the UPR becomes all the more necessary.

2. Localised Data as a Resource for Strengthening UPR Monitoring

The premise that LRGs hold disaggregated human rights data by virtue of their proximity to communities needs to be qualified by a realistic assessment of what kind of local data can sustainably feed into the UPR process. An important point emerging from the Roundtable is that the recurring claim that relevant data is simply unavailable does not withstand closer scrutiny: examined from an administrative rather than a human rights perspective, such data very often already exists, but it is organised according to a different logic and it is rarely framed in a human rights language.

Information relevant to human rights tends to surface when an issue is approached horizontally, across policy domains, rather than within the sectoral silos in which it was originally compiled. This is the strength of a human rights-based approach – placing the person, rather than the administration, at the centre of data collection – and it points to a persistent challenge of communication between existing systems and professional cultures.

There exist valuable instances at regional and local level on monitoring of projects and programmes that have relevance for human rights monitoring purposes. For instance,

regional cooperation projects of the Region Emilia-Romagna – managed through a dedicated software platform within the regional institutional setting – already generate disaggregated data on human rights education, gender equality, access to health and education, environmental sustainability and governance strengthening in partner countries. The data, however, remains framed in SDGs language and stored in a system designed for financial and operational tracking rather than human rights reporting, producing both a framing and operability gap.

In Gwangju, where local human rights indicators have been developed since 2012, a comparable pattern emerges. The city's indicators undoubtedly constitute valuable instruments of local accountability and political durability; nonetheless, they miss a formal linkage to UPR recommendations.

Furthermore, the establishment of programme-monitoring structures and systems may also be mandated under international human rights treaties, as is the case for the Charter of Fundamental Rights of the European Union, or the United Nation Convention on Rights of Persons with Disability. Where such systems and structures are there at the regional and local level, this reinforces the idea that large quantities of disaggregated data are already produced as a by-product of ordinary programme monitoring duties, without any need to build dedicated new data systems.

A key question is therefore how to link what LRGs are already doing to what feeds in UPR monitoring, all without making sub-national authorities' engagement in monitoring excessively burdensome.

The practical shift is therefore not from 'no data' to 'more data', but from disconnected data to reusable implementation information. A measure undertaken for local purposes could be recorded once against the relevant municipal or regional plan and then mapped, through transparent and human-validated links, to recommendations from the UPR, treaty bodies and Special Procedures, as well as to national commitments and SDG targets. This would preserve the local context in which the information was produced while allowing the same evidence to support internal coordination, national follow-up and international reporting. Interoperability should serve local priorities and should connect with, rather than displace, existing local tools.

Some practice is emerging showcasing a relevant ‘bridging’ capacity. In Sweden, for instance, a nation-wide network of human rights experts at local level has been in place for the past 7-8 years, and today it is coordinated by the Swedish national human rights institution. National Human Rights Institutions can play a valuable role in this regard, acting as brokers between the various actors involved, as well as collecting and structuring data for use across the different mechanisms. Another practical solution could be the adoption of interoperability protocols that allow national tracking systems to ingest structure inputs from sub-national sources without requiring to adopt entirely new digital systems or tools. Furthermore, National Statistical Offices can play an important role in constructing information and data flows with local authorities and partners, so as to enhance human rights data collection at the regional and local level.

Most importantly, human rights recommendations should be taken into consideration from the design stage of data collection onward, within a cycle in which statistical data, policy design and policy evaluation continuously feed into one another. Operationalising this cycle calls for a clear architecture across levels and alignment of top-down and bottom-up processes.

Collaboration and coordination among different levels of government is necessary in the elaboration of a system of reporting where all actors speak the same language and elaborate and test its tools together. A participatory approach to data collection that enables consultations with local and regional authorities, the respective communities and civil society organisations is also deemed fundamental to frame human rights indicators which are relevant in the local, national and international dimensions, which are used for the monitoring process at the international level while also being able to go into local situations and to integrate local contributions.

3. Digital Tools and Interoperability: Exploring Practical Solutions

Digital tools – tracking tools, databases and measurement projects and gateways – can help structure and sustain human rights monitoring among different levels of governance. Thus, when addressing the question of facilitating LRGs engagement with the UPR, their potential cannot be disregarded.

In fact, a number of concrete functions performed by digital tools can be identified. Digital tools can operate as repositories of human rights recommendations and as a form of institutional memory, keeping information accessible to officials over time and across changes in personnel, and thereby reducing the burden associated with retrieving and reconstructing past information for reporting purposes. By translating recommendations and technical requests into plain language, they can also render the demands of international monitoring more intelligible to local actors, who might otherwise struggle to understand what is expected of them and how their day-to-day work relates to specific recommendations. Where recommendations are systematically logged and tracked, digital tools further allow follow-up to become a continuous exercise in government coordination rather than an isolated, periodic one: institutions are able to maintain a record of the recommendations received, identify responsible actors, document measures adopted, and build an evidentiary basis for the preparation of subsequent reports – a function that, over time, fosters institutional ownership of the recommendations themselves. More broadly, digital tools can help bridge horizontal and vertical gaps in the flow of information, connecting sectoral policy areas that would otherwise remain siloed, linking local, regional and national levels of governance, and supporting transparency and continuity in policy implementation over time. Where systems are designed to map existing planning and reporting instruments directly onto human rights and SDG frameworks, they can additionally allow local and national authorities to draw on data they are already required to collect for other purposes, generating human rights relevance as a by-product of existing obligations rather than through additional reporting effort, with tangible gains in efficiency and timeliness.

An integrated LRG tracking system would bring these functions into a single local implementation infrastructure. Departments could maintain a shared overview of what is being done, by whom and with what evidence, while reminders and progress updates would support follow-up. Once the information is structured, it could be reused across NMIRF processes, UPR and treaty body reporting, follow-up to Special Procedures recommendations and SDG, VLR and VNR workflows. If successfully tested, this could be a game-changing shift for LRG human rights work: local delivery data would no longer be assembled ad hoc at reporting deadlines, but maintained as a continuous evidence base connecting everyday governance with international implementation and follow-up.

There is growing momentum for making use of digital tools in human rights monitoring efforts, as demonstrated by the number of tools that have emerged and are being developed at present by different States and the UN, often in collaboration. The following provides insights from the use or establishment of NRTA, Simore Plus and Impact OSS in Bosnia-Herzegovina, Paraguay, Samoa, and Scotland.

The National Recommendations Tracking Application (NRTA) is the tool developed by the OHCHR to support States and their NMIRFs in tracking human rights recommendations and their implementation, also in connection to the SDGs. NRTA serves as a repository of human rights recommendations, as data storage accessible to officials to get relevant information on human rights issues, as well as a repository of institutional memory. The undergoing development of the Application in Bosnia-Herzegovina can be taken as an illustrative perspective on how an NRTA can be used in practice in highly decentralised countries. In Bosnia-Herzegovina there are 14 levels of governance, and they contribute to national reporting efforts in cooperation with the Ministry for Human Rights and Refugees. The architecture of multi-level governance is therefore in place, but the process can be burdensome and sometimes delays in the flow of information can impede meaningful contribution from the local levels. The establishment of NRTA seeks to rationalize this architecture and provide concrete support in reporting and coordination. The Application was elaborated after consultation with different levels of governance to understand their working processes and methodologies in order to improve them with a digital structure where recommendations are translated in ‘plain’ language, clear guidance and tools are provided and the overall collection of relevant data is facilitated. While the operationalization of the Application has not started yet, its development underscored on the one hand that the contribution of LRGs is critical for the system’s comprehensiveness and relevance, on the other, that State level is also indispensable to ensure good coordination, quality check, meaningful involvement and consultation among all stakeholders.

Another relevant tool is the System for Recommendations Monitoring (Simore Plus) of Paraguay, which emerged as a concrete response to a need identified within the UPR framework, initially as a recommendation search platform developed for systematisation purposes, before its functionalities were strengthened and its scope expanded in 2014 and 2017. Beyond this technological evolution, however, Simore Plus is best understood not

merely as a digital platform or database, but as a national mechanism for implementation, reporting and follow-up, formally consolidated in 2015 through a presidential decree establishing its regulations and working methods. As such, it rests on two complementary components: a technological one, which facilitates the organisation and management of information, and a human one, which constitutes its central element. This human component consists of a network of focal points, jointly coordinated by the Ministry of Foreign Affairs and the Ministry of Justice, comprising officials from approximately 65 public institutions across the three branches of government as well as extra-governmental bodies; it is this network that enables UPR follow-up to translate into concrete institutional work, with focal points responsible for identifying measures adopted, reporting on progress, highlighting obstacles, and contributing to the validation of information. Thanks to Simore Plus, Paraguay is able to maintain an institutional record of the recommendations received, identify the institutions responsible for each case, document measures taken, and rely on an objective basis for the preparation of national reports. In this way, one of the mechanism's main contributions has been to transform recommendation follow-up into a continuous exercise in government coordination rather than an isolated activity, strengthening the State's preparation for the UPR and fostering institutional ownership of the recommendations.

Samoa's experience with Impact OSS (Integrated Management of Planning of Actions Open Source Software) offers a further illustration of the practical support digital tools can provide. Having initially adopted a digital system designed specifically to track human rights recommendations, Samoa encountered difficulties in gathering the necessary data on a consistent basis, and accordingly shifted to employing Impact OSS to track its national development and strategic plan instead. The software automatically maps the plan's indicators and actions against human rights recommendations and the SDGs, such that human rights and SDG mapping is generated as a by-product of information ministries are already required to submit as part of their ordinary mandate, rather than through dedicated reporting effort. The practical impact was significant: building on data already mapped against the SDGs, Samoa was able to complete its Voluntary National Review a full year ahead of schedule, in parallel with its UPR reporting. This experience has since informed related work in Vanuatu, where the approach is being extended to the community and local government level: a community

governance structure has developed its own strategic plan, which Impact OSS will track locally, with the resulting data feeding upward into the national-level system so as to establish a continuous, connected record from the community to the national level.

This is an example of a centralised architecture, where LRGs have their own portal access, information is easily transferred across levels, and infrastructure maintenance is shared with the central State. There can also be more distributed architectures, where LRGs can use their own software and potentially later add to a central platform for aggregating information.

Another relevant project for the establishment of a national tracking systems can be found in the devolved government of Scotland, where an Impact OSS-based tracking tool has been very recently developed following the Scottish Parliament Equalities Committee's report, 'Getting Rights Right'², which identified the need for a publicly accessible international treaty monitoring database system for Scotland, to allow stakeholders to scrutinise the Scottish Government's performance in respecting, protecting and fulfilling its human rights. The aim behind the establishment of Scotland's human rights tracker was to strengthen the follow-up stage to treaty body and UPR recommendations, in line with OHCHR guidance on NMIRFs, which underscores the importance of a tool that tracks recommendations and is periodically updated with implementation information, so as to reinforce the State's accountability and the transparency of its follow-up efforts. The tracker is also considered instrumental in streamlining continuity between reporting cycles and strengthening policy coherence across policy areas. Designed in a collaborative way with various stakeholders, it is expected to strengthen Scotland's capacity to pursue a collaborative, whole-of-society approach to human rights implementation.

Importantly, while the potential of digital tools in improving implementation capacity and sustaining a workable architecture linking national and local efforts is hardly deniable, it must be also acknowledged that political and administrative support are necessary for digital tools to function properly. In this respect, it is essential that national governments recognise the importance of enabling local and regional governments to collect relevant

² Equalities and Human Rights Committee, *Getting Rights Right: Human Rights and the Scottish Parliament*, 6th Report, 2018 (Session 5).

data, and of providing the support needed for implementation and follow-up. Such support not only facilitates international reporting, but, more fundamentally, contributes to improving conditions on the ground. Furthermore, while it is true that digital tools can be established even without a previously existent digital architecture, access to internet is an essential condition which should not be taken for granted, especially when considering rural areas.

4. Multi-Level Governance Models for Sustainable Engagement

Sustained multi-level governance is a precondition for the effectiveness of local and regional governments' engagement in the UPR cycle: without adequate coordination mechanisms and institutional arrangements, the recognition of LRGs' role risks remaining declaratory.

Many elements demand consideration when addressing the question of how, concretely, the UPR system can reflect or adapt to the multi-level governance of human rights, as a framework where LRGs are valued for their role as data partners and implementers, but also recognised for being co-creators of human rights on the ground. As a premise, it must be underscored once again that since the engagement of LRGs in the UPR is at its earliest stages, there are many different possibilities emerging or worthy of attention, rather than single or consolidated solutions. This follows, also, from the fact that each situation is specific to its own institutional and political context, so that solutions suited to one setting may not be fitting for another: addressing the question calls for an approach that eschews one-size-fits-all solutions.

As observed *supra*, NMIRFs can play a key role in allowing the meaningful engagement of LRGs in the UPR, in coordination with the State and other relevant domestic stakeholders. Recognising LRGs' potential should come with a clear institutional mandate in the national mechanisms, preferring structured coordination, standardised reporting templates, toolkits, predictable exchanges and clear guidance to ad hoc consultation.

Next to this, further institutional arrangements can support LRGs' engagement in the UPR in the various phases of the cycle. Concerning the review taking place in Geneva, some States have included LRGs' representatives in the delegation participating at the UPR

Working Group session. Furthermore, voluntary mid-term reports are recognised as valuable instruments for the inclusion of LRGs' input in the process, feeding the mechanism with local updates on implementation. Illustrative in this case is the example of the voluntary mid-term report of Italy to the third UPR cycle, containing an Annex dedicated to implementation measures by Italian Regions. Voluntary mid-term reports have the advantage of being rather flexible in content and are not subject to the word limits that constrain national reports – where the inclusion of an in-depth, locally relevant perspective is thereby technically hampered.

More generally, States could promote a whole-of-government, whole-of-society approach in the recommendations they make to States, advocating for stronger LRGs engagement directly in the process of review. Other instruments or mechanisms created to support States in the implementation of their recommendations can be adapted to facilitate engagement of the local and regional level. For instance, LRGs can be encouraged to approach implementation through the development of Local Human Rights Action Plan, that ideally build on the national one. Furthermore, voluntary Funds that offer States technical assistance in implementation could also be used for the benefit of LRGs in their implementation efforts.

These arrangements are not mutually exclusive: they may be adopted jointly or introduced progressively, in the awareness that one route of engagement can prepare the ground for more systematic participation over time. Structural presence within the NMIRF, for instance, may in itself open the way to representation within the national delegation. The most desirable configuration remains one grounded in State-level coordination, quality assurance and meaningful consultation with all relevant stakeholders – one in which the local perspective is brought to bear meaningfully and not in isolation, as part of the broader effort of all domestic actors engaged in the process.

However, in the current multilateralism's crisis, it is also opportune to reflect on less ideal scenarios, and different perspectives emerge in relation to the spaces and opportunities for direct participation of LRGs in the UPR, without the mediation of the State. On the one hand, it must be acknowledged that using national participation in international monitoring as a gateway for LRGs' engagement can be inadequate when the national government in the first place shows resistance towards international monitoring processes.

In this sense, providing for LRGs a seat at the table, with formal opportunities to participate directly in the UPR ensures that their voices are heard regardless of the national government's approach. On the other hand, it is also true that the UPR is centred on the State under review, and its inter-governmental character establishes a structural ceiling on the formal participation of LRGs. Their position is also distinctive: LRGs are themselves governmental actors, which not only makes the question of their direct participation a politically sensitive one, but also the enormous variation in their engagement with human rights impedes generalisations on their reliability as human rights interlocutors, and risks of manipulation of the system cannot be disregarded. Nevertheless, it must be also acknowledged that the stakeholder architecture of the international human rights monitoring has evolved in time and remains responsive to sustained advocacy – the inclusion of Indigenous Peoples in the Human Rights Council is indicative in this respect.

In the absence of formal procedural changes, a de facto pathway may lie in well-structured and interoperable decentralised data system that reviewers, who express interest in local information but lack the time to seek it out, can readily access. Moreover, voluntary mid-term reports incorporating local input offer a low-threshold entry point: given the absence of strict rules governing them, they could be useful for those LRGs who wished to engage directly in the UPR.

If governed well, such a system could materially change the terms of LRG engagement with UN human rights mechanisms. It would neither confer formal standing on LRGs nor bypass the State-centred character of the UPR. It could, however, provide national authorities, NHRIs and, where appropriate, UN mechanisms with a consistent and traceable source of local implementation information between review cycles. Local contributions could enter national reports, voluntary mid-term reports and follow-up processes earlier and more systematically. Where national channels remain limited, locally controlled and appropriately accessible data could also give reviewers a clearer evidence base. Its significance would therefore be practical rather than procedural: it could make sustained local participation possible without creating a separate reporting mechanism.

Further innovative approaches could be identified in the future to structure the UPR as a joined-up system, incorporating a local dimension into its functioning. This avenue was generally regarded as preferable to creating parallel reporting and monitoring mechanisms for the local and regional level.

Finally, it is also important to reflect on further incentives that can support sustained LRGs' engagement in the UPR over time. The narrative concerning what LRGs stand to gain in reporting remains underdeveloped. Discussed drivers include visibility and recognition at the national level, the strengthening of relations with central administration, and access to funding and to technical assistance also from international organisations. Participation in monitoring can be also viewed as a means of getting backing and support from international mechanisms for changes that are often not understood or ignored at the national level or running counter to national policies. The experience of Voluntary Local Reviews is instructive: cities embraced the Sustainable Development Goals because doing so advanced their own objectives, an investment logic that the human rights field has not yet replicated. The most operational lever is to concentrate on recommendations that fall within local and regional competences and require local involvement, since these can in turn open channels of financial support. Not to be forgotten, however, is that LRGs are State organs and their conduct is susceptible to engage the international responsibility of the State – which makes their engagement in the UPR not only an opportunity, but also a matter of duties.

5. From the Bologna II Discussions to a Pilot Initiative

The Bologna II discussions point towards a practical next step: a pilot with a small and diverse group of LRGs to test the integrated approach in practice. A first, light-touch phase would map each participant's existing plans, datasets, tools, relevant review cycles, institutional capacity and relationships with national actors. It would identify where integration could add value and assess the governance model best suited to each context. A smaller group would then proceed to co-design and implementation, applying the approach to existing plans and linking them to relevant human rights recommendations, national priorities and SDG targets. IMPACT OSS is proposed as the open-source

technical basis for this test, without excluding other interoperable solutions where they are better suited to the context.

The pilot would test the institutional model as much as the software: whether it improves LRGs' day-to-day coordination, makes local implementation systematically visible within national and international processes, and reduces duplication and recurrent reporting burdens. It would produce working local implementations, an assessment of usability and integration, and guidance for replication or scaling. The same structured evidence could also support funding applications, partnerships, domestic resource allocation and, where appropriate, public transparency and community engagement. These benefits would depend on accurate, accessible and contestable information rather than publication alone.

Guidance Note – Recommendations

1. LRGs should not be viewed as peripheral implementers of national directives but as structural components of the human rights system. Recognising LRGs' potential in the UPR monitoring process should come with inclusive institutional design of State's monitoring structures where LRGs' mandate is formalised. In NMIRFs, States should formalise LRGs engagement through full membership or observer status.
2. The formal inclusion of LRGs in States' monitoring structures should be complemented with arrangements that facilitate LRGs engagement with the process at the operational level, including the creation of simplified reporting templates and toolkits for local actors, the integration of local indicators into national monitoring systems, clear guidance in relation to specific recommendations, and the organisation of regular awareness-raising and capacity-building activities.
3. Sustained financial resources should be secured to enable continuous dialogue across all phases of the monitoring process and across review cycles, and account should be taken for the significant differences in institutional and financial capacity across LRGs within the same State.
4. Existing sources of disaggregated data at the local and regional level – generated through ordinary programme monitoring, locally developed indicators, or obligations stemming from international human rights instruments – should be identified and formally linked to UPR monitoring processes, addressing the framing and interoperability gaps that currently keep them disconnected from human rights reporting, rather than requiring the establishment of new dedicated data systems.
5. National Human Rights Institutions should be leveraged in their role as intermediaries between the different actors involved in the monitoring process, as

well as in the collection and structuring of data for use across the various mechanisms.

6. National Statistical Offices should be involved in constructing information and data flows with local authorities and territorial partners. A participatory approach to data collection should be adopted, involving local and regional authorities, communities and civil society organisations, to define indicators that are relevant at the local, national and international level.
7. Many of the challenges LRGs face in engaging with monitoring processes can be addressed with the development of digital tools. Digital tools should be developed to serve as repositories of human rights recommendations and institutional memory, to bridge horizontal and vertical gaps in the flow of information across sectoral policy areas and levels of governance, to translate recommendations and technical requests into plain language for local actors, and to enable systematic logging and tracking of recommendations so that follow-up becomes a continuous exercise in government coordination.
8. The different approaches available for the development of digital tools should be taken into account accordingly with the context of their operationalisation: architectures may be centralised, offering shared infrastructure but requiring sustained central commitment, or distributed, preserving local autonomy with subsequent opportunities of aggregation.
9. Digital tools should be developed through consultation and collaboration with the different levels of governance and relevant stakeholders concerned – including LRGs, NHRIs, civil society and public bodies – to understand their working methods and needs and to strengthen a whole-of-government and whole-of-society approach to their design and use.
10. Digital tools should be considered for their capacity to improve a multi-level system of governance in human rights monitoring, but they cannot substitute for

one, nor can they resolve what is, more often than not, a problem of institutional design. Political and administrative support from the national government should be recognised as a precondition for digital tools to function properly.

11. Various non-mutually exclusive and potentially progressive institutional arrangements could be further taken by States to sustain the engagement of LRGs in the UPR, including considering the inclusion of LRGs representatives in the national delegation participating in the UPR Working Group session in Geneva, and using voluntary mid-term reports as instruments for incorporating LRG input, given their flexibility and their exemption from the word limits that constrain national reports.
12. Innovative approaches should continue to be explored to structure the UPR as a joined-up system incorporating a local dimension, in preference to creating parallel reporting and monitoring mechanisms for the local and regional level.
13. States could further support LRGs' engagement through additional measures, such as promoting a whole-of-government, whole-of-society approach in the recommendations addressed to States, encouraging LRGs to develop Local Human Rights Action Plans building on national ones, and extending voluntary Funds for technical assistance in implementation to benefit LRGs' efforts.
14. De-facto and low-threshold pathways to allow LRGs' direct engagement in the UPR could be recognised in well-structured, interoperable and decentralised data systems communicating with the international one and voluntary mid-term reports, given the absence of strict rules governing their content.
15. A clearer narrative on what LRGs stand to gain from UPR engagement should be developed – drawing on the investment logic that has driven cities' embrace of the SDGs – addressing drivers such as visibility and recognition, strengthened relations with central administration, and access to funding and technical assistance. Advocacy should be directed at both national governments and LRGs,

to frame UPR engagement as an opportunity to support LRGs in discharging their functions, rather than as an additional burden. At the same time, LRGs' engagement should also be framed as a matter of duty, given their status as State organs.

16. Interested LRGs and partners should consider piloting local-first integrated tracking and data systems that build on existing plans, tools and evidence rather than creating parallel reporting processes. Adapted to the local institutional context, such pilots could test whether information generated through implementation can support local oversight and coordination with NMIRFs, while making evidence more traceable and reusable for the UPR, other UN human rights mechanisms and relevant SDG processes. Pilots should also assess whether the approach reduces reporting burdens and preserves local ownership, with appropriate safeguards for validation, privacy, security and human oversight.

Annex I

Concept Note: Integrated Tracking and Data Systems for Local and Regional Governments - Strengthening Delivery and Local–National Coordination

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A. The Strategic Context

The implementation coordination challenge

Local and regional governments are responsible for delivering a significant proportion of public services and local development activities, and are increasingly also recognised as duty-bearers with a role in realising rights across all areas of local policy. They generate substantial and rich information through planning processes, infrastructure delivery, community engagement, budgeting, and service provision.

However, this information is often fragmented across departments, held in different systems, and not easily connected to broader and national frameworks or reporting processes. Plans for housing, health, education, climate adaptation and social inclusion may be managed separately, with limited visibility across departments or toward residents and communities. This makes it difficult for LRGs to maintain a coherent overview of their own activities, identify gaps and duplication, communicate their achievements to stakeholders, and build the evidence base needed for funding, partnerships and strategic engagement.

This internal fragmentation also limits coordination with national governments. National frameworks may not fully reflect local realities, while local contributions and achievements often remain insufficiently visible within national systems. The result is a disconnect that affects resource allocation, policy coherence, and the ability of governments at different levels to work from a shared understanding of priorities, activities and outcomes.

This challenge is not only technical. In many contexts, LRGs lack formal channels into national reporting and follow-up processes, and their role as implementation partners is not fully recognised within national frameworks. Capacities also vary significantly - both

between LRGs and between national and local levels - which further limits the ability to coordinate effectively.

These challenges, like fragmentation itself, are structural features of how government works rather than failings of any particular LRG. The aim is therefore not to remove them but to connect across them.

Emerging tools and approaches

At the same time, there has been significant evolution internationally in how governments organise and track commitments and implementation efforts. Within the human rights sector, many governments have established National Mechanisms for Implementation, Reporting and Follow-up to improve coordination around international commitments, and digital tools such as the National Recommendations Tracking Database (NRTD), SIMORE+ and IMPACT OSS have emerged to help governments organise, track and report on recommendations and implementation progress. Over time, these systems have evolved beyond purely reporting functions, with growing interest in more flexible platforms capable of linking activities, plans and commitments across multiple frameworks simultaneously, including the SDGs.

In parallel, the Voluntary Local Review (VLR) movement has shown how LRGs can use global frameworks not as an external reporting obligation but as internal governance tools — organising existing action, exposing gaps, and communicating more effectively with national and international processes. As of 2024, hundreds of VLR-related submissions are listed on the UN DESA platform. The opportunity is not to add a new reporting layer, but to help LRGs use human rights and SDG frameworks to structure and strengthen what they are already doing. However, VLRs remain largely periodic exercises, and the lack of tools for continuous implementation tracking limits their potential as a sustained governance instrument.

These developments are taking place within a broader and growing ecosystem of actors working on localisation, multi-level governance and the role of LRGs in human rights and sustainable development. This includes the work of UCLG, the Global Taskforce of Local and Regional Governments, UN-Habitat, the Global Cities Hub, the Human Rights in Practice (HRIP) cooperation platform, human rights cities networks, and others. Recent

resolutions of the United Nations Human Rights Council have increasingly encouraged stronger engagement of LRGs within human rights implementation and follow-up processes, reflecting the reality that many human rights outcomes are delivered locally.

An opportunity to bridge the gaps

This creates a strategic opportunity. Advances in digital tracking systems now make it possible to address the implementation coordination challenge in a more integrated and practical way - starting from the needs of LRGs themselves, while enabling interoperability with national and international frameworks where this adds value.

The approach proposed here is grounded in a local-first principle: local priorities, service delivery needs and governance realities should shape how information systems are organised. Interoperability toward national and international frameworks is designed to support and strengthen (rather than drive) local implementation.

B. Strategic Opportunity for Local and Regional Governments

Strengthening Local Implementation and Coordination

The primary strategic opportunity for LRGs lies in improving how local activities, priorities and delivery efforts are organised, tracked and coordinated.

By using an integrated tracking platform, LRGs can organise existing plans, activities, projects and commitments within a single system, creating a coherent overview across departments and service areas. This enables clearer visibility of what is being done, by whom, and how different activities relate to one another.

In practice, this could mean tracking implementation of a local inclusion strategy across multiple departments, organising housing or accessibility actions alongside health and education commitments, or mapping local climate policies against both municipal targets and national plans, all within a single system rather than across disconnected processes.

This approach supports:

- improved visibility of local activities and priorities, both internally across departments and externally toward residents, communities and civil society;

- more structured follow-up on implementation efforts, including automated reminders and progress tracking;
- identification of gaps, duplication and underserved communities;
- better coordination across departments and levels of government;
- a stronger and continuously updated evidence base for planning, engagement and communication.

Rather than creating parallel reporting systems, the approach focuses on improving the usability and connectivity of information that LRGs are already generating through their existing functions. Features such as automated reminders, progress tracking, centralised activity management and real-time updates help maintain oversight of implementation without adding administrative burden.

Linking Local Action to National and International Frameworks

Once local activities and plans are organised within an integrated system, an important secondary opportunity emerges.

Because tools such as IMPACT OSS allow activities to be mapped across multiple frameworks simultaneously, LRGs can connect their existing work to national development priorities, human rights commitments and SDG targets without creating entirely separate reporting processes or creating significant additional administrative burdens. This is particularly important because much of the work already undertaken by LRGs directly contributes to the implementation of human rights obligations and the SDGs, even where this contribution is not currently visible or systematically recognised.

This enables LRGs to:

- strengthen engagement with national coordination mechanisms such as NMIRFs;
- identify gaps and underserved communities;
- Understand and communicate the value of their efforts towards the realisation of human rights;
- support more coherent SDG localisation efforts;
- contribute more effectively to national reporting and follow-up processes, including VLRs and Voluntary National Reviews (VNRs).

National governments also benefit directly, as their international reporting (UPR, treaty bodies, SDG reviews) is expected to cover the whole country, including subnational implementation. LRG tracking data can help fill what is often a blind spot in national reports.

The same continuously maintained implementation data can also support VLR processes. Rather than assembling evidence ad hoc before each review cycle, LRGs would have an organised and up-to-date evidence base that can feed VLRs, VNRs, NMIRFs and human rights reporting processes simultaneously.

Strengthening Funding, Partnerships and External Engagement

These framework linkages also have strategic value. Many funding streams increasingly require measurable outcomes, equity dimensions and localisation evidence. As international attention on the role of LRGs in human rights and SDG implementation grows, so too do opportunities for technical cooperation, peer-to-peer learning, partnerships and funding linked to implementation and good governance. A structured evidence base that connects local activities to recognised frameworks strengthens the LRG's position in grant applications, donor engagement and partnership negotiations. At the domestic level, the ability to demonstrate how local activities contribute to national priorities can also strengthen the LRG's position in national resource allocation and budget processes.

Community Engagement, Transparency and Accountability

If the platform makes local priorities, activities and progress publicly available, it can also serve as an outward-facing transparency tool, enabling residents, civil society organisations, NHRIs and other local stakeholders to access and engage with structured information on local implementation.

This can help improve accountability and trust between local governments and communities, while supporting more informed public engagement in local governance. From a human rights perspective, transparency and participation are not only governance benefits – they are human rights principles. A publicly accessible implementation platform helps embed these principles practically within local governance.

Peer Learning and Shared Resources

Where multiple LRGs adopt compatible approaches, opportunities emerge for peer learning and comparison. LRGs facing similar challenges can learn from each other's actions and implementation strategies. Where open source tools are used, LRGs can also share and build on each other's technical investments, reducing cost and duplication of effort.

C. The Role of Data and Digital Tools

Open Source, Open Data and Interoperability

The choice of technology and data principles has significant implications for how tracking systems can be adopted, sustained and integrated across institutions.

Open source software allows any LRG or organisation to freely adopt, adapt and build on a platform without licensing costs or vendor dependencies. This matters particularly in contexts where procurement budgets are limited, data sovereignty is important, or where multiple jurisdictions need the flexibility to configure the same tool for different local contexts.

Open data principles – publishing implementation data openly and exposing it via APIs – enable data sharing between jurisdictions and organisations, including civil society and researchers, while enhancing transparency. APIs also open the door to interoperability: consuming data from external sources and sharing local data with national platforms or aggregation layers.

In a landscape where LRGs already use a range of tools for action planning, project management and reporting, interoperability is essential. A tracking system should not replace these existing tools but connect with them, reducing duplication while making the same information usable across multiple purposes – from internal coordination to national reporting. Relevant integration points include:

- existing local action planning, project management and reporting tools already in use by LRGs;
- international databases for human rights recommendations and outcomes, such as the OHCHR Universal Human Rights Index (UHRI) and the UPR Info database;
- indicator databases such as Eurostat, World Bank, national and regional statistics offices, and SDG data portals;

- national tracking systems and NMIRFs where these exist.

The use of open source software, open data and APIs also effectively safeguards against shifts in political or institutional commitment: should a coordinating entity withdraw or a system be discontinued, other actors – such as an NHRI, LRG association, or individual LRGs – can re-establish it with limited effort.

Governance Models and Deployment Options

Implementation tracking systems can be deployed under different governance models, depending on the institutional context.

In a distributed model, a single LRG deploys its own instance of the platform, retaining full autonomy over configuration, data structures and priorities. This is the lowest-barrier entry point and the most pragmatic starting point where national coordination is not yet available. Scotland's Human Rights Tracker is an example of this model. Where multiple LRGs operate independent instances, data can be shared via APIs with a national or regional aggregation platform, preserving local autonomy while enabling a broader picture. This requires either agreed data standards or the development of mapping layers on the consuming end.

In a central multi-jurisdiction model, multiple jurisdictions share a single platform with dedicated portals, hosted by a coordinating entity such as a national government, NMIRF, NHRI, or LRG association. This enables shared infrastructure, cross-jurisdiction analysis and comparison, and a direct link to aggregated reporting. It requires sustained commitment from a coordinating entity and agreement among participating jurisdictions on shared data structures.

The governance model chosen will depend on institutional relationships, political context, available resources and the level of coordination that is feasible and desirable. These are not only technical architecture choices – they reflect different conditions for adoption, and a key question is under which conditions each model works best, and how LRGs can start pragmatically while keeping the door open for greater integration over time. The use of open source software, open data and APIs also ensures that starting with one model does not preclude evolving toward another.

IMPACT OSS

IMPACT OSS (“Integrated Management and Planning of ACTions — Open Source Software”) is built on these principles. It is fully open source, designed with open data and API access as core features, and structured to support integration with external systems.

The platform enables LRGs to organise and track their existing plans and actions within a single system, link them to objectives from multiple frameworks – such as human rights recommendations, SDG targets and national or local policy commitments – and monitor implementation progress over time. It supports follow-up through scheduled progress reports and can facilitate civil society input by allowing external users to submit progress updates for consideration and review by designated officials.

While IMPACT OSS currently only supports the distributed model, initial development work toward a multi-jurisdiction architecture has been started, including early work on a shared regional platform for member states of the Pacific Community (SPC) in the Pacific.

IMPACT OSS was originally developed with national governments and NHRIs in mind and is currently deployed in Samoa, New Zealand and Scotland. It is maintained by the Impact Open Source Software Trust, a charitable trust established in New Zealand in 2018 to maintain, promote and develop open source technologies for advancing human rights and sustainable development.

D. Pilot Initiative

A pilot would test this approach in practice, with the aim of producing both practical value for participating LRGs and transferable lessons for wider adoption. To lower the barrier to participation and allow the initiative to grow organically, it would be structured in two phases.

Scope and Approach

Phase 1: Ecosystem Mapping and Requirements Analysis

The first phase involves a low level of commitment from participating LRGs, requiring only input on their context, priorities and expectations. This keeps the barrier to entry low and could attract a larger and more varied group of cities and regions.

For each participating LRG, Phase 1 would map existing local plans, relevant review cycles (UPR, SDG, VLR), national frameworks, available datasets, and stakeholder relationships. It would also include a lightweight assessment of each LRG's existing tools, data, staff capacity and political context. Where relevant, it would consider how rights and commitments are currently understood and translated into local policy and programmes. This ensures any subsequent implementation builds on existing systems rather than duplicating them.

Ideally, participating LRGs would represent different contexts – for example, an LRG that has already undertaken a VLR and one that has not – to capture a range of use cases.

At the conclusion of the first phase, each participating LRG would receive a short report mapping their context against the different governance models and identifying where the approach could add value for them specifically. This gives LRGs something tangible in return for their input and helps them decide whether to continue to Phase 2.

Phase 2: Implementation and Roll-out

A smaller, more committed group of LRGs from Phase 1 would move to implementation: applying the approach to existing plans or strategies, mapping these against national priorities, human rights recommendations and SDG targets using IMPACT OSS, and assessing how this supports planning, coordination and engagement.

This phase would include a capacity building and co-design component, working with LRG officials to embed the approach within existing institutional workflows and strengthen local ownership.

What the Pilot Would Serve As

The pilot is designed to serve a dual purpose:

- as a template for distributed adoption, producing a working LRG implementation that can be readily adopted by other individual LRGs; and
- as a foundation for a multi-jurisdiction model, where a single-LRG pilot provides the basis for a shared platform if multiple LRGs participate or join later.

This means the investment is not limited to a single experiment. The same work can scale in either direction depending on what emerges.

Assessment

The pilot would assess:

- whether the approach improves the LRG's own planning, oversight and coordination across departments;
- whether it helps the LRG communicate its work and achievements to residents, communities and civil society;
- whether organising and linking local information improves coordination between local and national levels;
- whether linking local activities to human rights and SDG frameworks provides additional practical value, including for VLR processes;
- whether it strengthens the LRG's position in funding, partnership and external engagement;
- how effectively the approach integrates with existing systems and reporting processes;
- and whether it reduces duplication and reporting burdens while strengthening the overall quality and accessibility of information.

Outputs

Expected outputs include:

Phase 1

- Context reports for each participating LRG
- A cross-LRG synthesis of needs, readiness and priorities

Phase 2

- A working local implementation linking existing plans, actions and frameworks for each participating LRG
- A usability and integration assessment
- Guidance on which governance model suits which institutional context
- Documented lessons learned and recommendations for scaling

Resources and Participation

Participation in Phase 1 requires only that LRGs share information about their context, priorities and existing systems. LRGs continuing to Phase 2 would need to bring existing plans or strategies, identify a coordinating contact, and engage relevant departments.

The technical platform, customisation, training and support would be provided through the Impact OSS Trust, with costs depending on scope, hosting arrangements and level of customisation required.

E. Conclusion

The fragmentation of local information across departments limits the ability of LRGs to maintain oversight of their own implementation efforts, communicate their achievements, and engage effectively with partners and stakeholders. This also contributes to a longstanding disconnect between national frameworks and local delivery that affects coordination, planning, resource allocation and policy effectiveness across sectors.

By enabling LRGs to organise, track and connect their existing activities and data – first for their own planning and coordination purposes, and then to broader national and international frameworks – tools such as IMPACT OSS provide a practical mechanism for strengthening local governance while also supporting human rights, SDG and VLR reporting processes.

The proposed pilot provides an opportunity to test how this approach can deliver practical value for local and regional governments, while producing transferable lessons and reusable infrastructure for wider adoption. Its two-phase design keeps the barrier to entry low – beginning with a light-touch mapping of each LRG's context and needs before any commitment to implementation – making it accessible to a wide range of local and regional governments regardless of their starting point.

Beyond improving internal coordination and reducing reporting burdens, the approach offers LRGs a way to make their role in delivering on national and international commitments – across human rights, the SDGs and broader development agendas – systematically visible. The opportunity is not only to track implementation more effectively, but to ensure that local contributions are recognised and reflected within the systems that shape policy, resources and accountability at every level.