

Ethical Advocacy in International Human Rights Litigation: Navigating Integrity Across Legal Systems

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ABSTRACT

Legal advocacy demands a delicate balance between zealous representation and ethical responsibility—a challenge that becomes even more complex in international human rights litigation. Human rights lawyers operate in high-stakes legal environments, from the International Criminal Court (ICC) to the European Court of Human Rights (ECHR), where they must uphold fair trial rights, client confidentiality, and professional integrity while navigating politically charged cases and systemic injustices. This article examines the ethical

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dilemmas faced by human rights lawyers in cross-border litigation, addressing key questions: Can a lawyer defend an alleged war criminal while still advocating for victims' rights? Should confidentiality be upheld even when disclosure could expose crimes against humanity? How do ethical obligations shift when practicing across multiple legal systems? By analyzing landmark cases, comparative legal ethics, and practical advocacy strategies, this paper provides a framework for lawyers to navigate these ethical gray areas while remaining steadfast in their commitment to justice. It explores ethical conflicts in international tribunals, focusing on the balance between due process, client loyalty, and human rights protection. It further contrasts ethical obligations across legal systems, particularly differences between the United States, the United Kingdom, civil law, and international standards, revealing inconsistencies in professional conduct requirements. As global legal frameworks evolve, the ethical responsibilities of human rights lawyers will be more crucial than ever in shaping the future of justice.

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I. INTRODUCTION

In 2006, Thomas Lubanga Dyilo became the first individual tried before the International Criminal Court (ICC).¹ A warlord accused of conscripting child soldiers in the Democratic Republic of the Congo, his case symbolized a milestone for international justice.² Yet, behind the courtroom drama lay a fundamental ethical dilemma—one that continues to haunt international human rights lawyers today. The prosecution sought robust victim participation, arguing that those

1. See, e.g., Louise Chappell, *The Gender Injustice Cascade: 'Transformative' Reparations for Victims of Sexual and Gender-Based Crimes in the Lubanga Case at the International Criminal Court*, 21 INT'L J. HUM. RTS. 1223 (2017) ("In March 2012, Thomas Lubanga Dyilo from the Democratic Republic of the Congo (DRC) was the first person to be tried and convicted by the International Criminal Court (ICC).").

2. See, e.g., Sara Anoushirvani, *The Future of the International Criminal Court: The Long Road to Legitimacy Begins with the Trial of Thomas Lubanga Dyilo*, 22 PACE INT'L L. REV. 213 (2010) (discussing how the ICC's treatment of the Lubanga case and upholding the defendant's right to a fair trial represents a step forward towards the ICC being recognized as a legitimate judicial institutions with the global order).

affected by Lubanga's crimes deserved a voice in the proceedings.³ Lubanga's defense counsel, however, insisted that expanding victims' rights risked undermining due process and the accused's right to a fair trial.⁴

This trial did not just decide the fate of Lubanga; it exposed the tensions that define human rights advocacy: justice for victims versus fairness for the accused,⁵ public accountability versus professional responsibility,⁶ and zealous advocacy versus ethical constraints.⁷ Across international courts—from the ICC to the European Court of Human Rights (ECHR)—human rights lawyers face unparalleled ethical dilemmas.⁸ Unlike domestic attorneys, who operate within clearly defined national legal frameworks, international human rights lawyers must navigate overlapping jurisdictions,⁹ inconsistent ethical standards,¹⁰ and politically sensitive cases.¹¹ Their clients range from victims of state-sponsored violence to government officials accused of war crimes—each with competing legal and moral considerations.

3. Djurdja Lazić, *Introductory Note to the International Criminal Court: Prosecutor v. Thomas Lubanga* (Appeals Chamber, Decision on Victim Participation), 47 AM. SOC'Y INT'L L. 968, 968 (2008).

4. Status Conference, *Prosecutor v. Lubanga*, ICC-01/04-01/06-T-75-ENG ET WT, 8–9 (Feb. 13, 2008), <https://www.icc-cpi.int/court-record/icc-01/04-01/06-t-75-eng>.

5. Lazić, *supra* note 3, at 968.

6. See Carla Ferstman, *Limited Charges and Limited Judgments by the International Criminal Court – Who Bears the Greatest Responsibility?*, 16 INT'L J. HUM. RTS. 796 (2012) (noting the failure to prosecute sexual violence in the *Lubanga* case raises concerns on fairness and miscarriage of justice, further underscoring the need for better public accountability while balancing professional obligations).

7. See Benjamin Schiff, *The ICC's Potential for Doing Bad When Pursuing Good* (2012) (discussing ways that the ICC navigates ethical challenges to maintain its legitimacy, including failing to address victim expectation of justice).

8. NIGEL BIGGAR, *WHAT'S WRONG WITH RIGHTS?* 323 (1st ed. 2020) (critiquing how human rights lawyers navigate ethical dilemmas, such as how most rights are not absolute and courts make imperfect compromises when balancing other legal, political, and/or social obligations).

9. See Morial Shah, *Ethical Standards for International Human Rights Lawyers*, 32 GEO. J. LEGAL ETHICS 213, 217–18 (2019) (identifying four roles through Barrish's framework that human rights lawyers operate across different jurisdictions: as domestic litigators, as regional lawyers, as international litigators, and as advocates working outside the formal court system who uses his or her understanding of the system).

10. *Id.* at 231–32 (discussing the value of multicultural perspectives to ethical standards in human rights advocacy but underlines the need for basic universal human rights principles to shape the professional duties of advocates).

11. Scholars have documented how human rights advocacy carries the risk of increased victimization, though unintentionally. See, e.g., Shah, *supra* note 9, at 230. See also Barbora Bukovská, *Perpetuating Good: Unintended Consequences of International Human Rights Advocacy*, 9 SUR INT'L J. HUM. RTS. 7, 10–12 (2008).

These lawyers must ask themselves: Can one defend an alleged war criminal while still advocating for human rights? Should confidentiality be preserved when disclosure might expose crimes against humanity? How do ethical obligations shift when practicing across multiple legal systems?

This Article argues that the most effective human rights lawyers are those who can balance zealous advocacy with ethical responsibility, ensuring that justice is pursued without compromising legal integrity. The tension between defending clients and upholding broader human rights principles is a defining challenge in international legal practice.¹²

II. THE ETHICAL CHALLENGES OF HUMAN RIGHTS ADVOCACY IN INTERNATIONAL COURTS

International human rights lawyers are often caught in an ethical paradox. On one hand, they serve as advocates for justice, representing victims of state violence, political persecution, and mass atrocities.¹³ On the other, they are bound by professional duties to uphold due process and ensure a fair trial for all individuals, including those accused of human rights violations.¹⁴ This tension is particularly pronounced in international tribunals, where human rights lawyers must navigate politically sensitive cases, overlapping legal frameworks, and conflicting ethical obligations.¹⁵

Unlike domestic attorneys, who operate within a single legal system, international human rights lawyers frequently practice before institutions such as the International Criminal Court (ICC), where they may represent either victims or defendants accused of war crimes and genocide; the European Court of Human Rights (ECHR), where they challenge state actions that violate fundamental rights; the International Court of Justice (ICJ), where they argue cases of state responsibility for human rights abuses; and UN human rights bodies, where they engage

12. Shah, *supra* note 9, at 221–22 (discussing the tension that exists for human rights practitioners between local codes and those of the tribunal).

13. Shannon M. Roesler, *The Ethics of Global Justice Lawyering*, 13 YALE HUM. RTS. & DEV. L.J. 185, 205–06 (2010).

14. Mbuayang explores the right to a fair trial through the lens of human rights, offering a perspective balancing the minimum requirement to a fair trial while providing its application in international criminal law. See COLLINS MBUAYANG, *THE RIGHT TO A FAIR TRIAL IN INTERNATIONAL CRIMINAL PROCEEDINGS* (1st ed. 2018).

15. Nell Moley, *Confronting the Challenges of Ethical Accountability in International Human Rights Lawyering*, 50 STAN. J. INT'L L. 359, 381 (2014).

in strategic litigation, diplomatic advocacy, and treaty enforcement mechanisms.¹⁶

Each of these institutions follows different procedural and ethical standards, forcing lawyers to adapt to inconsistent rules governing client representation, confidentiality, and advocacy tactics.¹⁷ The result is an ethical gray zone in which lawyers must balance fierce advocacy with professional integrity—a challenge best illustrated by real-world cases.

A. Case Studies: Ethics in Action

The first-ever trial before the ICC, *Prosecutor v. Thomas Lubanga Dyilo*, exposed a fundamental ethical dilemma in international criminal justice. Lubanga, a former rebel leader, stood accused of conscripting child soldiers in the Democratic Republic of the Congo. The prosecution sought broad victim participation, arguing that those harmed by Lubanga's crimes deserved a voice in the proceedings.¹⁸ Defense attorneys, however, insisted that an expansive role for victims could compromise the defendant's right to a fair trial by introducing prejudicial narratives before the court had assessed the evidence.¹⁹ This case raises key ethical questions about how international tribunals should balance victim participation with the rights of the accused, whether human rights lawyers can advocate for victims' voices in court without undermining procedural fairness, and when public calls for justice cross into prejudicial advocacy.²⁰

The ICC's decision to limit victim participation to certain procedural aspects reflected an attempt to strike a balance between fairness and accountability.²¹ However, the controversy revealed the ethical tightrope that human rights lawyers must walk, ensuring justice for victims while upholding the fundamental principles of due process.

16. See CHRISTOPHER GANE & MARK MACKAREL, HUMAN RIGHTS AND THE ADMINISTRATION OF JUSTICE: INTERNATIONAL INSTRUMENTS (1st ed. 1997) (This book, edited by Christopher Gane and Mark Mackarel, explores international human rights and justice through a comprehensive examination of international instruments.).

17. Moley, *supra* note 15, at 380.

18. Lazić, *supra* note 3, at 969.

19. Sabine Swoboda, *The ICC Disclosure Regime – A Defence Perspective*, 19 CRIM. L.F. 449, 458–62 (2008).

20. *Id.* at 461.

21. See Judgment, *Prosecutor v. Lubanga Dyilo*, ICC-01/04-01/06-3466-Red, ¶ 3 (July 18, 2019); Separate Opinion of Judge Eboe-Osuji, *Prosecutor v. Lubanga Dyilo*, ICC-01/04-01/06-3466-Anxl, ¶ 12 (July 18, 2019).

B. *The Public Interest vs. Individual Client's Interests*

A defining challenge for human rights lawyers is the conflict between representing an individual client and advancing broader public interest goals. Many human rights cases involve systemic injustices, meaning that legal decisions affect not just the individual client but entire communities and global human rights standards.²²

A particularly difficult ethical question arises in the defense of individuals accused of war crimes and crimes against humanity. Defending a government official accused of ordering mass executions, for example, may appear to contradict the fundamental mission of human rights advocacy. Yet due process requires that even those accused of the worst crimes receive competent legal representation.²³ If a defense lawyer secures an acquittal for an alleged human rights violator, does it harm the legitimacy of international justice, or does it reinforce the principle of fair trials?

A controversial example is the defense of Slobodan Milošević before the International Criminal Tribunal for the Former Yugoslavia (ICTY). Milošević, accused of orchestrating genocide and ethnic cleansing, was represented by lawyers who faced harsh criticism from human rights organizations.²⁴ They argued, however, that denying a defendant proper legal representation would undermine the very foundations of human rights law.²⁵ This paradox forces human rights lawyers to confront a difficult reality: is it possible to defend human rights while also defending those accused of violating them?

C. *The Inescapable Ethical Dilemmas of International Human*

22. Beth Van Schaack, *With All Deliberate Speed: Civil Human Rights Litigation as a Tool for Social Change*, 57 VAND. L. REV. 2305, 2324–25 (2004) (noting how civil human rights litigation serves a representation function by providing public accountability and recognition of wrongdoings that address broader patterns of injustices affecting communities associated in an individual plaintiff's case).

23. Mikhail Wladimiroff, *Defending Individuals Accused of Genocide*, 40 CASE W. RES. J. INT'L L. 271, 273–77 (2008).

24. See *Weighing the Evidence: Lessons from the Slobodan Milošević Trial*, HUMAN RIGHTS WATCH (Dec. 14, 2006), <https://www.refworld.org/reference/countryrep/hrw/2006/en/39368>; see also Hiram Abtahi & Grant Dawson, *The Anatomy of the Milošević Trial (2001-2006)*, J. OF INT'L HUMANITARIAN ACTION, 4–5 (2016).

25. Milan Markovic, *In the Interests of Justice: A Critique of the ICTY Trial Court's Decision to Assign Counsel to Slobodan Milosevic*, 18 GEO. J. LEGAL ETHICS 947, 950–957 (2005).

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Unlike in domestic litigation, where ethical guidelines are well-established, international human rights law presents a fragmented and evolving legal landscape. Lawyers must navigate inconsistent procedural rules, conflicting ethical duties, and politically sensitive cases, all while striving to uphold justice and fairness in global legal proceedings.²⁶

As this section has demonstrated, the ethical dilemmas in human rights advocacy are unavoidable. Lawyers must often choose between zealous advocacy and procedural fairness.²⁷ They must determine whether protecting individual clients is more important than advancing broader public interest goals. They must balance client confidentiality with the duty to prevent harm and expose human rights abuses.²⁸ There are no simple answers—only difficult trade-offs.²⁹ What remains clear, however, is that international human rights lawyers play an essential role in shaping the evolution of global justice. The next section will explore how lawyers can balance these competing ethical demands, focusing on comparative perspectives across different legal systems and the challenges of cross-border legal ethics.

III. BALANCING ZEALOUS REPRESENTATION AND ETHICAL BOUNDARIES

A. The Duty of Candor vs. The Duty to Clients

At the heart of international human rights litigation lies a fundamental tension between a lawyer's duty of candor to the court and their obligation to provide zealous representation for their client. Domestic legal systems provide clear ethical guidelines regarding honesty and disclosure,³⁰ yet these principles become more difficult to navigate in cross-border human rights cases.³¹ Lawyers working before international tribunals frequently encounter situations where

26. Shah, *supra* note 9, at 218–20.

27. David Weissbrodt, *Ethical Problems of an International Human Rights Law Practice*, 7 MICH. J. INT'L L. 217, 219 (1985) (discussing how international human rights lawyers balance zealous advocacy with legal boundaries when it comes to handling confidential information, especially where the use of confidential information is unclear).

28. Shah, *supra* note 9, at 222.

29. Biggar, *supra* note 8, at 323.

30. Shah, *supra* note 9, at 218.

31. *Id.* at 220–23.

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maintaining client loyalty may come at the expense of full transparency, raising ethical questions about the limits of advocacy.³²

One of the most contentious dilemmas arises in asylum and refugee cases, where lawyers represent individuals fleeing persecution. In many instances, clients may exaggerate threats to their safety in order to strengthen their claims for asylum.³³ A lawyer who suspects that their client has misrepresented facts faces a difficult decision: to correct the record, potentially weakening the client's case and increasing their risk of deportation, or to remain silent, prioritizing the client's safety over strict adherence to legal truthfulness.³⁴

This dilemma highlights the competing ethical duties of human rights lawyers. While the obligation to provide competent representation requires an attorney to advocate zealously for their client's best interests, the duty of candor prohibits lawyers from knowingly misleading legal authorities.³⁵ However, in politically charged asylum cases, evidence of persecution is often difficult to obtain, and the burden of proof may fall unfairly on the applicant.³⁶ The question then becomes: does adherence to formal legal ethics outweigh the moral duty to protect a client from persecution? This issue is particularly relevant in cases where human rights lawyers represent dissidents fleeing authoritarian regimes. In many jurisdictions, courts demand specific evidence to grant asylum, even when the applicant has fled under urgent and dangerous circumstances.³⁷ Should a lawyer

32. *Id.* at 219.

33. See Nathan P. Jones & Howard Campbell, *Dilemmas of Immigrant Asylum Claims for Expert Witnesses*, 46 ANNALS ANTHROPOLOGICAL PRAC. 99, 100–01 (2022) (noting a case study of the U.S. asylum claims system and the ethical dilemma it invites by participating in a flawed legal system while balancing an obligation to help legal clients receive relief); see also Hilary Evans Cameron, *Risk and the Reasonable Refugee: Exploring a Key Credibility Inference in Canadian Refugee Status Rejections*, 35 INT'L J. REFUGEE L. 10 (2023).

34. *Immigration Work – Warning Notice*, SOLIC. REGUL. AUTH. (Sept. 27, 2023), <https://www.sra.org.uk/solicitors/guidance/immigration-work/>.

35. Frances C. DeLaurentis, *When Ethical Worlds Collide: Teaching Novice Legal Writers to Balance the Duties of Zealous Advocacy and Candor to the Tribunal*, 7 DREXEL L. REV. 1, 31 (2014) (“The instruction and examples set out in the text are intended to demonstrate the different stance, purpose, and audience of persuasive documents, not to encourage writers to misstate the law.”).

36. Christian Cameron, *Why Do You Persecute Me? Proving the Nexus Requirement for Asylum*, 18 U. MIA. INT'L & COMP. L. REV. 233, 235 (2011).

37. Susan K. Kerns, *Country Conditions Documentation in U.S. Asylum Cases: Leveling the Evidentiary Playing Field*, 8 IND. J. GLOB. LEGAL STUD. 187, 201–04 (2000) (“Evidence of generally oppressive conditions in the country of origin is by itself insufficient to show that the individual applicant is at particular risk on account of a protected characteristic

present the strongest possible case for the client, even if doing so involves selective omissions or strategically framed narratives? Or should they uphold absolute truthfulness, even if it results in their client being forcibly returned to persecution? These questions expose the inescapable conflict between ethical legal practice and moral obligations in human rights advocacy.

B. Conflicts of Interest in International Advocacy

Human rights lawyers frequently work across multiple jurisdictions,³⁸ engaging in litigation, advocacy, and advisory roles that can create significant conflicts of interest. Unlike domestic lawyers, whose ethical obligations are governed by national bar associations, international human rights practitioners often operate in fragmented legal systems, where ethical rules may conflict with one another.³⁹ A particularly complex scenario arises when lawyers represent multiple victims of state-sponsored violence while simultaneously working with international bodies investigating those same states.⁴⁰ The case of *Bosnia v. Serbia* before the International Court of Justice (ICJ) exemplifies this challenge.⁴¹ The case, which determined whether Serbia bore responsibility for genocide in Bosnia, required legal teams to balance diplomatic pressure with strict ethical obligations. Lawyers advocating for Bosnia's claims of genocide also had to navigate interactions with international institutions conducting war crimes investigations, raising questions about whether their dual roles compromised their impartiality.⁴²

The issue of conflict of interest is further complicated when human rights lawyers work in advisory capacities for both governments and international organizations. For example, a lawyer representing Rohingya genocide victims in proceedings before the International

or belief. Country conditions documentation nonetheless helps applicants establish that certain protected characteristics or beliefs are targeted by a persecutor.”).

38. Shah, *supra* note 9, at 217–18.

39. *Id.* at 231.

40. *Id.* at 228.

41. See *Bosnia and Herzegovina v. Serbia and Montenegro*, ICJ GL No 91, ICGJ 70 (ICJ 2007).

42. Rebecca Hamilton & Richard J. Goldstone, *Bosnia v. Serbia: Lessons from the Encounter of the International Court of Justice with the International Criminal Tribunal for the Former Yugoslavia*, 21 LEIDEN J. INT'L L. 95, 111 (2008) (“As the case load of the ICC grows, one can predict the question of the circumstances under which it is appropriate for one international body to adopt the factual findings of another international body will become a significant issue for those interested in international criminal cases.”).

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Criminal Court (ICC) may also be advising the United Nations on Myanmar's accountability mechanisms. If the legal strategy pursued in one forum differs from the policy recommendations made in another, does this constitute a breach of ethical obligations? The challenge lies in ensuring that human rights lawyers maintain professional independence while working within overlapping legal and political systems.⁴³

Another ethical dilemma arises in transitional justice mechanisms, where lawyers may be engaged in both litigation and negotiations for post-conflict resolution. In countries emerging from mass atrocities, international human rights lawyers may work simultaneously to prosecute perpetrators while advising truth and reconciliation commissions that promote restorative justice.⁴⁴ The potential for conflicting obligations is significant: should a lawyer prioritize accountability through legal punishment, or should they support negotiated settlements that may involve amnesties for certain perpetrators? These conflicts force human rights advocates to confront difficult questions about their role in global justice.

C. The Limits of Advocacy in Authoritarian Regimes

Human rights lawyers practicing in authoritarian states face unique ethical challenges that often extend beyond traditional legal considerations. In many cases, these lawyers must weigh the risks of public advocacy against the need for discreet legal representation. Representing dissidents, refugees, or political prisoners in hostile legal environments often places lawyers themselves in danger,⁴⁵ raising ethical questions about how far they should go in challenging oppressive regimes.⁴⁶

One of the most striking examples of this dilemma is the legal defense of Russian opposition leader Alexei Navalny. His legal team was caught between two conflicting duties: representing him in Russian courts under a legal system widely regarded as politically compromised,

43. Shah, *supra* note 9, at 217–18.

44. Jennifer J. Llewellyn & Robert Howse, *Institutions for Restorative Justice: The South African Truth and Reconciliation Commission*, 49 U. TORONTO L.J. 355, 356 (1999).

45. See *UN Rights Expert Calls for End to Russia's Crackdown on Lawyers*, UN NEWS (Jan. 21, 2025), <https://news.un.org/en/story/2025/01/1159221>.

46. Kieran McEvoy et al., *Lawyers in Conflict and Transition*, THE PRACTICE (July/Aug. 2022), <https://clp.law.harvard.edu/knowledge-hub/magazine/issues/lawyers-during-conflict/lawyers-in-conflict-and-transition/> (“First, even in the least hopeful environments, courts can serve as sites of instrumental resistance to authoritarian impulses.”).

and engaging in international advocacy to expose the lack of judicial independence in Russia.⁴⁷ While publicly denouncing the Russian judicial process might have strengthened international efforts to pressure the government, it also risked undermining their ability to represent Navalny within the legal system.⁴⁸ His lawyers had to decide whether to prioritize their client's immediate legal defense or use their platform to call for broader systemic change, knowing that doing so could invite personal retaliation.

The ethical constraints of advocacy in authoritarian regimes are further illustrated by the experience of Chinese human rights lawyers who have faced government persecution for defending political activists. In China, lawyers who take on cases involving free speech, religious freedom, or political dissent are often subject to harassment, disbarment, or imprisonment.⁴⁹ When legal representation itself becomes a target of state repression, human rights lawyers must consider whether they can effectively serve their clients while also protecting their own ability to continue practicing law.

Another dilemma arises in cases where international human rights lawyers are called upon to represent individuals in politically sensitive trials in foreign jurisdictions.⁵⁰ A Western human rights lawyer representing a detained journalist in Turkey,⁵¹ for example, may face pressure from international organizations to use the case to highlight broader concerns about press freedom. However, taking an overtly political stance may harm the client's case if it antagonizes the local judiciary.⁵² The challenge lies in determining whether lawyers should

47. Elena Macomber, "[W]e Have Had Enough Revolutions": *International Advocacy Strategies Through the Lens of Russian Political Prisoners*, 33 MINN. J. INT'L L. 237, 252-54 (2024).

48. *Prison Terms for Navalny's Russian Defense Lawyers*, HUMAN RIGHTS WATCH (Jan. 22, 2025, 10:08 AM), <https://www.hrw.org/news/2025/01/22/prison-terms-navalnys-russian-defense-lawyers>.

49. See *Third Anniversary of the Lawyers Crackdown in China: Where Are the Human Rights Lawyers?*, AMNESTY INT'L (July 9, 2018), <https://www.amnesty.org/en/latest/campaigns/2018/07/china-human-rights-lawyers-crackdown-third-anniversary/>; see also EVA PILS, CHINA'S HUM. RIGHTS LAW.: ADVOCACY AND RESISTANCE 105 (1st ed. 2015) ("[Rights lawyers'] experiences can help us to understand some of the techniques used to scare off, keep out, shout down, or more permanently professionally silence lawyers who try to engage in authentic courtroom advocacy.").

50. Shah, *supra* note 9, at 222-23.

51. *World Report 2023: Turkey*, HUM. RTS. WATCH, <https://www.hrw.org/world-report/2023/country-chapters/turkey> (last visited Mar. 14, 2025, 7:20 PM).

52. Shah, *supra* note 9, at 231.

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act as neutral advocates within the legal system or as political actors seeking systemic change.

D. Navigating the Ethical Boundaries of Human Rights Law

International human rights law is fraught with ethical dilemmas that test the limits of legal advocacy. Lawyers working in this field must constantly weigh competing obligations—whether to prioritize candor or client protection, whether to navigate conflicts of interest in multi-jurisdictional cases, and whether to engage in public advocacy when operating in authoritarian regimes. Unlike in domestic legal practice, where ethical standards are more clearly defined, human rights lawyers often find themselves working in gray areas where professional guidelines offer little clarity.

While these challenges may never be fully resolved, they underscore the importance of ethical decision-making in human rights advocacy. The question is not whether human rights lawyers will continue to face these dilemmas, but how they can develop strategies to navigate them without compromising either their professional integrity or their commitment to justice.

IV. COMPARATIVE PERSPECTIVES ON LEGAL ETHICS

A. Different Ethical Standards in Different Legal Systems

Legal ethics in human rights advocacy are shaped by the jurisdiction in which a lawyer operates. While the fundamental principles of legal practice—confidentiality, duty of loyalty, and duty of candor—are widely recognized,⁵³ their application varies significantly across different legal systems.⁵⁴ This divergence creates challenges for international human rights lawyers, who frequently operate in multiple jurisdictions and must navigate conflicting ethical standards.⁵⁵

53. L. Ray Patterson, *Legal Ethics and the Lawyer's Duty of Loyalty*, 29 EMORY L.J. 909, 914–15 (1980) (“Given the new nineteenth-century notion of loyalty to the client, the recognition of the duty of confidentiality as an ethical duty was almost inevitable . . .”).

54. See Richard Wai-Sang Wu et al., *Legal Professionalism and the Ethical Challenge for Legal Education: Insights from a Comparative Study of Future Lawyers in Greater China*, 244 CHINA Q. 1118, 1119 (2020) (“Our study is based on the conceptual framework that future lawyers trained and shaped by different legal education systems are likely to adopt different values which, in turn, will influence their career orientations.”).

55. Shah, *supra* note 9, at 217.

One of the most striking differences exists between common law and civil law systems. In common law jurisdictions, such as the United States and the United Kingdom, the adversarial system governs legal practice. Lawyers are expected to advocate zealously for their clients, even when doing so may involve strategic omissions or aggressive courtroom tactics.⁵⁶ The American Bar Association's (ABA) Model Rules of Professional Conduct, for instance, emphasize the lawyer's duty to their client, often placing it above broader societal concerns.⁵⁷ In contrast, civil law jurisdictions, such as France and Germany, follow an inquisitorial system in which lawyers are expected to collaborate with the court in seeking the truth.⁵⁸ In these systems, ethical obligations require lawyers to act as "officers of justice" rather than as partisan advocates where candor to the tribunal may take precedence over client loyalty.

These differing ethical frameworks become particularly relevant in cases involving state security and international human rights. In the United Kingdom, laws governing national security impose stricter obligations on lawyers to disclose information that may be linked to terrorism or threats to public safety.⁵⁹ The United Kingdom's Solicitors Regulation Authority Code of Conduct requires lawyers to prioritize legal and ethical obligations to the public interest, even if it means

56. Murray L. Schwartz, *The Zeal of the Civil Advocate*, 8 AM. B. FOUND. RSCH. J. 543, 547 (1983) ("That is, each representative—as each party—will attempt to prosecute and present all the evidence and argument thought to support the particular claim and to rebut that which is prosecuted and presented by the other party or its representative. This does not of course say anything about *how* that prosecution and presentation is to take place, that is, the procedural and evidentiary rules.").

57. Neil W. Hamilton & Louise D. Bilionis, *Revised ABA Standards 303(b) and (c) and the Formation of a Lawyer's Professional Identity, Part 1: Understanding the New Requirements*, NALP (July 2022), <https://www.nalp.org/revised-aba-standards-part-1>.

58. Amalia D. Kessler, *Toward an Account of the Nineteenth-Century Emergence of the Comparative Accusatorial/Inquisitorial Divide*, 71 AM. J. COMP. L. 296, 296–97 (2023) (discussing the history of the inquisitorial and adversarial divide between civil and common law through the framing of the political and legal implications of the Napoleonic conquest.).

59. *See For Information Note: Operating Within Counter-Terrorism Legislation, Counter-Terrorism Sanctions and Export Control*, Gov.UK (Apr. 13, 2023), <https://www.gov.uk/government/publications/operating-within-counter-terrorism-legislation/for-information-note-operating-within-counter-terrorism-legislation> (Section 19 of the Terrorism Act 2000 requires individuals in certain roles to disclose information that may be relevant to preventing terrorism or securing the apprehension of a terrorist offender.).

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breaching client confidentiality.⁶⁰ By contrast, the ABA Model Rules in the United States offer a narrower exception to confidentiality, allowing disclosure only in cases where serious bodily harm is imminent.⁶¹ This distinction is particularly relevant in asylum and political refugee cases, where lawyers representing clients fleeing authoritarian regimes may struggle with how much confidential information to reveal in court while ensuring their client's safety.⁶²

B. International Human Rights Lawyers: Who Sets the Rules?

Unlike national legal systems, which are governed by specific ethical codes enforced by bar associations, international human rights litigation lacks a universal framework for legal ethics. Lawyers who practice before international courts such as the International Criminal Court (ICC), the International Court of Justice (ICJ), and regional human rights tribunals must navigate a complex landscape of overlapping and, at times, contradictory ethical rules. This absence of a unified ethical code creates inconsistencies in how lawyers approach advocacy, confidentiality, and conflicts of interest.⁶³

At the ICC, for example, legal professionals are bound by the ICC's Code of Professional Conduct, which establishes basic ethical principles.⁶⁴ However, lawyers practicing before the ICC must also adhere to the rules of their home jurisdiction, creating situations where national ethical obligations may conflict with international tribunal standards. A lawyer admitted to practice in the United States may be accustomed to the principle of zealous advocacy, while an attorney trained in a civil law jurisdiction may be expected to act with greater neutrality. This discrepancy has led to disputes over courtroom conduct, evidentiary disclosures, and the role of victim participation in trials.

60. *Solicitors Regulation Authority, SRA Code of Conduct for Solicitors, RELs and RFLs, SOLIC. REGUL. AUTH.*, <https://www.sra.org.uk/solicitors/standards-regulations/code-conduct-solicitors/>.

61. See AMERICAN BAR ASSOCIATION, MODEL R. OF PRO. CONDUCT 1.6 (1983), https://www.americanbar.org/groups/professional_responsibility/publications/model_rules_of_professional_conduct/rule_1_6_confidentiality_of_information/.

62. See Gregory Howard Siskind, *Ethical Obligations of the Lawyer-Client Relationship in Immigration Law*, *GPSOLO MAG.* (Aug. 12, 2024), <https://www.americanbar.org/groups/gpsolo/resources/magazine/2024-july-august/ethical-obligations-lawyer-client-relationship-immigration-law/>.

63. Shah, *supra* note 9, at 217-18.

64. INT'L CRIM. CT., CODE OF PRO. CONDUCT FOR COUNS., art. 1 (2005) [hereinafter CODE OF PRO. CONDUCT FOR COUNS.], <https://www.icc-cpi.int/sites/default/files/COPCEng.pdf>.

The lack of a universal ethical code is further complicated by the increasing role of non-governmental organizations (NGOs) and human rights advocacy groups in international litigation. Many human rights lawyers operate within a hybrid framework, acting both as legal representatives and as public advocates. This dual role raises ethical questions about impartiality and professional independence. Should a lawyer representing a victim before the European Court of Human Rights be actively engaged in advocacy efforts calling for sanctions against the government being sued? Does this create a conflict of interest, or does it simply reflect the evolving role of human rights lawyers as both litigators and change agents?

C. The Need for a Global Code of Legal Ethics

Given these challenges, some legal scholars argue for the creation of a universal ethical framework for international human rights lawyers.⁶⁵ A standardized code, endorsed by the United Nations⁶⁶ or the ICC,⁶⁷ could help harmonize ethical obligations across jurisdictions and ensure that lawyers practicing in multiple legal systems have a consistent set of professional guidelines. Such a code could address the following three key ethical concerns.

First, confidentiality and disclosure obligations should be clarified to establish a common standard for handling sensitive client information, particularly in cases involving refugees, war crimes, and crimes against humanity. Many lawyers representing victims of state-sponsored violence face dilemmas about whether disclosing client details to international bodies might place those clients at risk.⁶⁸ A global ethical code could provide clearer guidance on when disclosure is warranted and how to protect vulnerable clients.⁶⁹

Second, conflicts of interest need clearer definitions in international litigation. Human rights lawyers frequently represent multiple victims in the same case or work with international bodies investigating the same violations. A standardized set of rules could

65. Shah, *supra* note 9, at 232–33.

66. See *Basic Principles on the Role of Lawyers*, OFF. OF THE HIGH COMM’R FOR HUM. RTS., <https://www.ohchr.org/en/instruments-mechanisms/instruments/basic-principles-role-lawyers> (adopted Sept. 7, 1990).

67. CODE OF PROF. CONDUCT FOR COUNS., *supra* note 64.

68. See Shah, *supra* note 9, at 227–28.

69. *Id.* at 222–23.

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establish protocols for disclosing potential conflicts and creating safeguards to ensure impartial representation.

Third, courtroom conduct at international tribunals must be standardized. The ICC, ICJ, and regional human rights courts each have different procedural traditions, reflecting the legal systems of the judges who preside over them. As a result, legal advocacy at these tribunals is inconsistent, with some lawyers engaging in adversarial advocacy while others follow a more neutral, inquiry-driven approach. A global code of legal ethics could create a baseline for professional conduct in these forums, ensuring that all lawyers—regardless of their legal background—are held to the same ethical standards.

However, opponents of a universal ethical framework argue that imposing a single code on all legal practitioners could erode the diversity of legal traditions that currently shape international human rights litigation.⁷⁰ Legal systems are deeply rooted in cultural and historical contexts, and an overly rigid ethical code might fail to account for the nuances of different legal traditions. Critics also warn that such a code could be manipulated by powerful states or international institutions to control how human rights lawyers operate, potentially limiting the ability of legal advocates to challenge state abuses effectively.⁷¹

D. Conclusion: The Ethical Crossroads of International Human Rights Law

The challenges of legal ethics in international human rights advocacy underscore the need for greater clarity and consistency in professional obligations. As lawyers continue to operate in a fragmented system, they must navigate conflicting ethical rules while ensuring that their advocacy remains principled and effective. While a global code of conduct could provide much-needed standardization, it also raises

70. See Alexandra Xanthaki, *Multiculturalism and International Law: Discussing Universal Standards*, 32 *HUM. RTS. Q.* 21, 38–43 (2010); See also Jessica M. Almqvist, *The Impact of Cultural Diversity on International Criminal Proceedings*, 4 *J. INT'L CRIM. JUST.* 745 (2006).

71. Lauri Mälksoo, *Civilizational Diversity as a Challenge to the (False) Universality of International Law*, 9 *ASIAN J. INT'L L.* 155, 163 (2019) (examining how international law is rooted in Western and colonial modes of governance with a false sense of universality, and that international law scholars who take this framing more seriously in their scholarship).

questions about whether a universal approach to legal ethics can accommodate the diversity of legal traditions worldwide.

As human rights law evolves, so too must the ethical frameworks that guide its practitioners. The need for a balanced approach—one that respects both international legal norms and national legal traditions—will be critical in shaping the future of ethical advocacy in human rights litigation. The next section will explore practical solutions for addressing these ethical challenges, offering recommendations for reform, model ethical guidelines, and best practices for human rights lawyers working across multiple jurisdictions.

V. SOLUTIONS AND BEST PRACTICES FOR ETHICAL HUMAN RIGHTS ADVOCACY

The ethical dilemmas facing human rights lawyers are not abstract theoretical concerns; they shape the very fabric of global justice. As the landscape of human rights litigation continues to evolve, legal practitioners must develop concrete strategies for navigating ethical conflicts while remaining committed to both their clients and the rule of law. While no single framework can eliminate the challenges inherent in international advocacy, a set of best practices can provide guidance for ensuring ethical integrity without compromising zealous representation. This section outlines key strategies for resolving ethical conflicts, proposes reforms to strengthen ethical guidelines in international human rights law, and offers a roadmap for practitioners, scholars, and policymakers to reinforce professional responsibility in global legal advocacy.

A. Informed Consent: Ensuring Clients Understand Legal Risks and Broader Human Rights Consequences

One of the most fundamental ethical obligations of human rights lawyers is ensuring that their clients understand the full scope of the legal, political, and personal risks associated with their cases. In high-stakes international litigation, a client's decision to proceed with a case can have implications far beyond the courtroom. Human rights lawyers must provide clients with comprehensive guidance about not only their legal rights but also the broader consequences of litigation.

For example, asylum seekers who testify against repressive regimes in international courts may inadvertently put their families at risk. Similarly, victims of war crimes who participate in ICC proceedings may face retaliation from state actors or non-state militias. Lawyers

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have a duty to ensure that clients make informed decisions based on a clear understanding of the potential dangers.⁷² This requires lawyers to go beyond standard legal disclosures and engage in risk assessment, advising clients not only on the likelihood of legal success but also on the practical realities of their participation in litigation.

A best practice for human rights lawyers is to establish comprehensive informed consent protocols that incorporate both legal and extralegal considerations. This could involve collaboration with security experts, human rights organizations, and trauma specialists to provide clients with a full picture of the risks they face.⁷³ By integrating a holistic approach to client counseling, human rights lawyers can ensure that their advocacy does not inadvertently cause harm to those they seek to protect.

B. Ethical Guidelines for Cross-Border Cases: Developing a Model Framework for Multi-Jurisdictional Practice

Given the fragmented nature of international human rights law, developing a standardized set of ethical principles for lawyers practicing in multiple legal systems is essential. A model framework for cross-border legal ethics would establish consistent guidelines for handling key issues such as confidentiality, conflicts of interest, and advocacy strategies in politically sensitive cases.

One of the primary challenges in multi-jurisdictional practice is the variance in confidentiality rules.⁷⁴ A lawyer representing a political prisoner before the European Court of Human Rights may be bound by strict confidentiality obligations under European legal ethics rules, while simultaneously practicing in a jurisdiction where disclosure of certain information is mandatory. This creates a conflict where a lawyer

72. See INT'L CRIM. CT., R. OF PROC. AND EVIDENCE 50 (2002), <https://www.icc-cpi.int/sites/default/files/RulesProcedureEvidenceEng.pdf>; see also Paulina Vega González, *The Role of Victims in International Criminal Court Proceedings*, 5 SUR - INT'L J. ON HUM. RTS. 19, 28 (2006).

73. For example, European Human Rights Advocacy Centre offers a guide for trauma-informed advocacy, including the lawyer-client relationship and navigating international legal processes. Chapter 4 & 5 are particularly informative in this regard. See *Guidelines for Trauma Informed Legal Practice for Lawyers Working with Adult Survivors of Human Rights Violations*, EUROPEAN HUM. RTS. ADVOC. CTR. (Mar. 2022), <http://ehrac.org.uk/wp-content/uploads/2022/03/Trauma-Informed-Legal-Practice-Toolkit-2022.pdf>.

74. Refer to INT'L BAR ASS'N, INT'L PRIN. ON CONDUCT FOR THE LEGAL PRO. § 4 (adopted May 2011), https://www.icj.org/wp-content/uploads/2014/10/IBA_International_Principles_on_Conduct_for_the_legal_prof.pdf.

must choose which ethical standard to prioritize. A model framework would provide guidance on how to navigate such conflicts while ensuring that the client's rights are not jeopardized.

A practical solution is the establishment of a "universal ethical baseline" that defines minimum professional standards applicable across international human rights tribunals. Such a framework could be developed through a collaboration between international bar associations, legal ethics scholars, and human rights institutions. By promoting consistent ethical guidelines, the international legal community can create greater transparency and accountability in human rights advocacy.

C. Law Reform Proposals: Strengthening Ethical Standards in ICC and UN Human Rights Legal Proceedings

The ICC and UN human rights bodies play a crucial role in international justice, yet their ethical guidelines for legal practitioners remain inconsistent and, at times, underdeveloped.⁷⁵ To strengthen ethical accountability, reforms should focus on three key areas.

First, international courts should implement clear protocols for addressing conflicts of interest in cases involving human rights violations. Many human rights lawyers simultaneously work with NGOs, international organizations, and advocacy groups, raising concerns about impartiality.⁷⁶ The ICC should adopt stricter disclosure requirements to ensure transparency regarding a lawyer's affiliations and potential biases.

Second, ethical training should be mandatory for all legal practitioners appearing before international tribunals. While domestic bar associations require continuing legal education, there is no equivalent system for human rights lawyers practicing in international courts.⁷⁷ Establishing ethics certification programs for lawyers working

75. See *Legal Traditions Debate: Has the ICC Under-Represented Non-Western Legal Traditions?*, INT'L CRIM. CT. F., <https://iccforum.com/legal-traditions> (last visited Mar. 27, 2025).

76. Press Release, General Assembly, Speakers Stress Need for Impartiality at International Criminal Court, as President Briefs General Assembly on Recent Milestones in Prosecuting Atrocity Crimes, U.N. Press Release GA/12381 (Nov. 10, 2021).

77. Chiara Giorgetti & Jeffrey L. Dunoff, *Introduction to the Symposium: A Focus on Ethics in International Courts and Tribunals*, 113 AM. J. INT'L L. 279, 280 (2019), <https://scholarship.richmond.edu/cgi/viewcontent.cgi?article=2580&context=law-faculty-publications> ("There is no international bar or professional responsibility exam that

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in human rights litigation would enhance professional standards and ensure that practitioners are well-equipped to handle complex ethical dilemmas.

Third, the UN should develop a specialized advisory body to provide ethical guidance for lawyers engaged in human rights cases. This body could issue advisory opinions on ethical disputes, helping lawyers navigate difficult decisions in real time. By creating a dedicated forum for ethical deliberation, international institutions can offer greater clarity on best practices for human rights advocacy

D. Call to Action for Legal Practitioners: Strengthening Ethical Safeguards While Promoting Human Rights

Ensuring ethical integrity in human rights litigation is not the sole responsibility of courts or policymakers. Legal practitioners, scholars, and advocacy groups must take proactive steps to refine ethical best practices and reinforce accountability in global legal advocacy.

Academics play a critical role in shaping ethical discourse by conducting research on evolving challenges in international legal ethics and developing case studies that provide guidance for practitioners.⁷⁸ Law schools should integrate ethics training into human rights law curricula, ensuring that future generations of lawyers are prepared to navigate the complexities of cross-border legal practice.

Practicing attorneys must prioritize self-regulation and transparency in their work. Establishing internal review mechanisms within law firms and human rights organizations can help prevent conflicts of interest and ensure that advocacy remains within ethical boundaries. Legal practitioners should also engage in ongoing ethical discussions with peers, fostering a culture of accountability within the human rights legal community.

Policymakers must work toward implementing structural reforms that enhance ethical safeguards while preserving the effectiveness of human rights advocacy. Governments should support international

attorneys must pass to participate in international litigation or arbitrations, and no single ethical code applies to all [international courts and tribunals].”).

78. See Gleider Hernández, *The Responsibility of the International Legal Academic: Situating the Grammarian Within the 'Invisible College,'* in *INTERNATIONAL LAW AS A PROFESSION* 160, 162 (Jean d'Aspremont et al. eds., 2017) (“As such, this chapter aims to situate the function of the international legal academic as an integral part of the wider international legal profession.”).

efforts to standardize ethical guidelines and strengthen enforcement mechanisms for legal ethics violations in international litigation. By collaborating with legal institutions and human rights organizations, policymakers can contribute to the development of a fair and transparent ethical framework for global human rights law.

E. Conclusion: Advancing Ethical Integrity in Human Rights Litigation

As international human rights law continues to evolve, the need for strong ethical guidelines becomes increasingly urgent. Lawyers practicing in this field must navigate conflicting obligations, political pressures, and legal uncertainties while upholding the fundamental principles of justice and accountability.⁷⁹ By implementing informed consent protocols, establishing a universal ethical framework, reforming legal ethics guidelines in international tribunals, and fostering a culture of ethical accountability, the legal community can ensure that human rights advocacy remains both effective and principled.

The ethical challenges faced by human rights lawyers will never be fully resolved, but through collective efforts, the international legal community can create a stronger foundation for ethical advocacy. The final section of this article will reaffirm the importance of balancing zealous representation with professional integrity, underscoring the crucial role of human rights lawyers in shaping the future of global justice.

VI. CONCLUSION: UPHOLDING ETHICAL INTEGRITY IN HUMAN RIGHTS ADVOCACY

The practice of human rights law is one of the most noble and challenging legal fields, requiring lawyers to navigate complex ethical dilemmas while ensuring that justice is pursued without compromising legal integrity. As this article has demonstrated, human rights lawyers face competing obligations to their clients, international legal institutions, and the broader principles of justice. Unlike in domestic legal systems, where ethical frameworks are well-established, the field

79. Weissbrodt, *supra* note 27, at 218–19.

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of international human rights litigation remains fragmented,⁸⁰ politically sensitive,⁸¹ and ethically uncertain.⁸²

The central challenge lies in balancing zealous representation with professional responsibility. On one hand, lawyers must advocate forcefully for their clients,⁸³ whether they are victims of human rights violations or individuals accused of international crimes. On the other, they must adhere to ethical constraints that preserve fairness, prevent conflicts of interest, and maintain the credibility of international justice systems.⁸⁴ This tension is not a flaw in the system but an inherent feature of legal advocacy in global human rights litigation.

A. Reaffirming the Key Ethical Challenges

This Article has outlined the key ethical dilemmas faced by human rights lawyers, highlighting the complexity of international legal practice. The first major challenge is the duty of candor versus the duty to clients. In cases involving asylum seekers, political prisoners, or alleged war criminals, lawyers must decide whether absolute truthfulness outweighs the moral duty to protect their clients from potential harm. In many instances, advocacy requires strategic decision-making about when to disclose information and when to safeguard confidentiality.

Another critical issue is conflicts of interest in multi-jurisdictional practice.⁸⁵ Human rights lawyers frequently operate across multiple legal systems and tribunals, often serving as legal representatives, policy advisors, and public advocates simultaneously. Without clear guidelines governing these dual roles, lawyers risk undermining their own credibility and the fairness of international proceedings.

The third major challenge is the ethical limits of advocacy in authoritarian regimes. Human rights lawyers working in politically repressive environments must constantly assess whether public advocacy helps or harms their clients.⁸⁶ The choice between challenging a corrupt judiciary and working within a flawed system is not always

80. Shah, *supra* note 9, at 217–18.

81. See, e.g., *Id.* at 230–31; see also Bukovská, *supra* note 11, at 10–11.

82. Shah, *supra* note 9, at 231–32.

83. Roesler, *supra* note 13, at 205–06.

84. See Mbuayang, *supra* note 14.

85. INT'L BAR ASS'N, *supra* note 74, at § 3.

86. McEvoy et al., *supra* note 46.

clear, yet it has direct implications for both the lawyer's effectiveness and their personal safety.

B. Advancing Ethical Solutions in Human Rights Law

Despite these challenges, solutions exist to strengthen ethical integrity in international human rights advocacy. This Article has proposed a set of best practices to guide lawyers in navigating these dilemmas. Ensuring comprehensive informed consent is crucial, as it allows clients to understand the broader implications of their legal cases, including potential risks of retaliation and the long-term impact on human rights policy.

The development of a universal ethical framework for international human rights lawyers is another necessary reform. The absence of a standardized code of conduct for lawyers practicing across multiple jurisdictions has created inconsistencies in how ethical dilemmas are resolved.⁸⁷ Establishing a global set of ethical guidelines, endorsed by institutions such as the United Nations⁸⁸ or the International Criminal Court,⁸⁹ would create more clarity for legal practitioners.

Furthermore, law reform at the ICC and UN human rights bodies is essential. International courts must implement stronger ethical oversight, clearer conflict-of-interest rules, and mandatory ethics training for lawyers appearing before international tribunals. The credibility of human rights law depends not only on legal arguments and judicial decisions but also on the integrity of the legal practitioners who shape these cases.

Finally, legal practitioners, scholars, and policymakers must collaborate to create a culture of ethical accountability in human rights litigation. Law schools should integrate human rights legal ethics into their curricula, ensuring that future lawyers are prepared for the complex moral dilemmas they will face. International bar associations and human rights organizations should provide continuing legal education on ethical advocacy to ensure that lawyers remain engaged in professional development and self-regulation.⁹⁰

87. Giorgetti & Dunoff, *supra* note 77, at 282.

88. *Basic Principles on the Role of Lawyers*, *supra* note 66.

89. CODE OF PROF. CONDUCT FOR COUNS., *supra* note 64, at art. 1.

90. Giorgetti & Dunoff, *supra* note 77, at 280.

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C. The Future of Ethical Human Rights Advocacy

As global legal frameworks evolve, human rights lawyers will continue to play a vital role in shaping international justice. However, their influence depends not only on their ability to win cases but also on their commitment to upholding the ethical foundations of the legal profession. The future of human rights law depends on lawyers who can defend the rule of law while maintaining professional responsibility, ensuring that justice is not only pursued but achieved with integrity. Human rights lawyers stand at the crossroads of advocacy and accountability, justice and fairness, strategy and morality. They are not just legal professionals but custodians of global justice, responsible for ensuring that the fight for human rights does not undermine the very principles upon which justice is built. The dilemmas they face are profound, but so too is their responsibility to meet these challenges with both courage and ethical clarity.

In a world increasingly defined by political instability, human rights violations, and judicial uncertainty, the role of human rights lawyers is more critical than ever. Their ability to navigate ethical dilemmas without sacrificing integrity will determine the credibility of international legal institutions and the future of global human rights advocacy. The ethical challenges in human rights litigation are not going away, but neither is the legal profession's duty to meet them head-on. The question remains: how will the next generation of human rights lawyers uphold the delicate balance between zealous advocacy and ethical responsibility?

The true test of a human rights lawyer is not just their ability to defend a client or argue a case but their commitment to ethical advocacy in the face of difficult moral choices. The future of international human rights law will be shaped not only by legal victories but by the ethical standards that guide those who fight for justice.