



gender action for peace and security

Assessing UK Government Action on Women, Peace and Security in 2019

March 2020

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About GAPS

Gender Action for Peace and Security (GAPS) is the UK’s Women, Peace and Security civil society network. We are a membership organisation of NGOs and experts in the fields of development, human rights, humanitarian assistance and peacebuilding. We were founded to promote and hold the UK Government to account on its international commitments to women and girls in conflict areas worldwide.

GAPS welcome its collaborative relationship with the UK Government as it develops, reviews and implements its WPS commitments. The dedication of the UK Government’s cross-Whitehall WPS group is clear and remains an important mechanism for the implementation of the fourth UK National Action Plan (NAP) on WPS.

This report builds on previous GAPS documents which include analysis of and recommendations for the UK Government’s work on WPS. These include our previous annual shadow reports¹.

This paper was written for publication in March 2020 therefore is correct as of then.

¹ Gender Action for Peace and Security (GAPS), [Assessing UK Government Action on Women, Peace and Security in 2018, January 2019. Gender Action for Peace and Security \(GAPS\).](#)

1. Introduction

At the global level, 2019 was another year of pushback against women and girls' rights with threats to hard won achievements at all levels. During the negotiations of Women, Peace and Security UN Security Council Resolutions (UNSCRs) 2467 (April) and 2493 (October), the positions of some Security Council permanent members threatened the consensus and progressive commitments, with protections for sexual and reproductive health and rights and for Women Human Rights Defenders (WHRDs) at risk. In March the US expanded its Mexico City Policy, also known as the 'global gag-rule' to cut funding to NGOs which fund or support other groups that provide or discuss abortion, in addition to those directly providing or advocating for abortion².

Women continued to be excluded from major peace processes in Afghanistan, South Sudan, Syria and Yemen. Threats and violence against WHRDs and their organisations escalated, as observed by the UN Special Rapporteur on Human Rights Defenders³. Amnesty International has documented almost 40 new laws around the world since 2017 that restrict the work of human rights defenders by limiting the right to association or otherwise restrict the work of civil society organisations⁴. In addition to restrictions on registration of NGOs, receipt of foreign funds and other operations, WHRDs face entrenched misogyny from the state, the media and their own families and communities. This climate has a chilling effect on WHRDs, their organisations and movements⁵.

In the UK, 2019 marked another year of uncertainty with Brexit dominating the political space culminating in a General Election in December 2019. Internationally the UK has pushed back against rollbacks on women and girls' rights, including through criticisms of UNSCRs 2467 and 2493, demonstrating their commitment to this agenda across lead departments. The UK Government has also supported the development and implementation of NAPs in Afghanistan, Azerbaijan, Egypt, Iraq, Jordan, Kenya, Lithuania and South Africa. Domestically, the UK underwent its 8th periodic review by the CEDAW Committee which highlighted some of the failures in policy coherence for the Women, Peace and Security agenda which continue to persist. It remains paramount that as we enter a key year for women and girls' rights the UK continues to work towards implementing all its Women, Peace and Security commitments both internationally and domestically.

2020 marks 20 years of landmark UNSCR on Women, Peace and Security and 25 years since the Beijing Platform for Action where enough has not been done to advance its objectives in fragile and conflict affected states (FCAS). On the anniversary of UNSCR 1325, the UK Government funded GAPS and our partners to undertake consultations with 252 individuals and organisations to outline recommendations from civil society in 11 countries. The report, [the 10 Steps: Turning Women, Peace and Security Commitments into Implementation](#) provides a clear body of evidence and recommendations for the international community to comprehensively implement its existing commitments⁶. GAPS look forward to working with the UK Government and other international and national actors to implement these recommendations.

Funding

The lack of detail on spend in the UK Government annual report demonstrates the need for: a dedicated NAP budget to meet internal-facing commitments (UK capacity) on training, process and monitoring; a Women, Peace and Security Fund for implementation of commitments in the strategic objectives; and open and transparent collection and publication of Women, Peace and Security spend. For example, the Conflict Stability and Security Fund (CSSF) supports some of the delivery of the 2018- 2022 UK National Action Plan

² Guardian, [Trump expands global gag rule that blocks US aid for abortion groups](#)

³ UN General Assembly, [Situation of women human rights defenders, Report of the Special Rapporteur on the situation of human rights defenders](#),

⁴ Amnesty International, [Laws designed to silence: The global crackdown on civil society organisations](#)

⁵ Womankind, [Breaking the Silence: Ending online violence and abuse against women's rights activists](#)

⁶ GAPS, [The 10 Steps: Turning Women, Peace and Security Commitments into Implementation](#)

for Women, Peace and Security⁷ but only where the NAP supports the UK's national security goals. However, it remains difficult to see the extent to which CSSF funds are in fact advancing NAP-specific commitments and objectives because there is not a dedicated Women, Peace and Security fund nor is the gender spend published publicly.

GAPS welcome the UK Government's continued funding for programmes to prevent violence against women and girls (VAWG) globally, including announcing £67.5m over seven years for Phase 2 of What Works to end VAWG⁸ as well as funding for women in mediation. This should be seen in comparison to the amount of overseas development assistance (ODA) provided by the UK Government in 2018 was £14,546 million⁹. However, there is no systematic tracking or reporting of ODA spend on women, peace and security across UK Government departments, so it is impossible to say what percentage of UK ODA is spent on Women, Peace and Security. AWID has estimated, using the latest figures available from the OECD, that globally only 1% of gender equality funding is going to women's organisations¹⁰. It is important that the UK upscales its funding to women-led and women rights organisations. More also needs to be done to ensure they are not adversely affected by counter-terrorism legislation. Evidence shows that the specific profile of women's rights organising and organisations has meant that they experience these rules in several gender-specific ways¹¹.

Recommendations

The UK Government should:

- Provide **dedicated, long-term, core, flexible funding for local women's rights organisations** for their **self-defined priorities**.
- Establish a **new, dedicated Women, Peace and Security fund** to support work on gender equality, women and girls' rights and to support NAP implementation **in addition to existing peace building resources**. This should **represent a minimum of 15% of all peacebuilding funds** (multilateral and bilateral) as called for by the UN Secretary General.
- **Track and publish all spend in FCAS** using the Gender Equality Marker (GEM) to have more effective, open and transparent reporting on WPS spend. For example, [Canada](#) has developed a new method to track Women, Peace and Security spending.

Monitoring Evaluation and Learning

GAPS welcome the UK Government's open engagement with civil society on the UK NAP process and initial process evaluation, due to be published in 2019 (now expected in 2020). The engagement included interviews with the GAPS secretariat and some GAPS member organisations to inform the report, and the opportunity to provide oral and written feedback on a draft report in October 2019. We look forward to seeing how GAPS's expertise is incorporated into the final report. As 2020 is the midline point of the NAP, GAPS remain concerned that the timeline for the initial evaluation has slipped into the third year of the current NAP. GAPS welcome the UK Government's recognition that improvements are required in the existing monitoring, evaluation and learning system. GAPS therefore expects that the UK Government has plans and funding for the midline and end line evaluation process, including how it will build on the findings of the initial process evaluation and hopes it plans to act on its recommendations in the implementation of

⁷ HM Government, [Conflict, Stability and Security Fund: Annual Report 2017/2018](#)

⁸ Guardian, [British government takes global lead on violence against women and girls](#)

⁹ DFID, [Statistics on International Development, Provisional UK Aid spend 2018](#)

¹⁰ AWID, [Towards a feminist funding ecosystem: a framework and practical guide](#), OECD, [Aid in support of Gender Equality and Women's empowerment](#)

¹¹ Duke Law, [Tightening the purse strings: What countering terrorism financing costs gender equality and security](#)

the NAP. In future NAPs, the MEL should be planned and budgeted for during NAP development rather than during NAP implementation.

GAPS stress the importance of consistently evaluating a NAP's impact as well as process. An impact evaluation would be more beneficial. The MEL would also be more effective if the UK Government developed a theory of change for its NAP. This in turn would strengthen monitoring, evaluation and learning (MEL) processes and would better highlight what change can be attributed to the UK Government's NAP and its implementation. This is particularly important considering the changes to and removal of indicators in the 2019 annual report. It is vital that all MEL processes are inclusive of national civil society organisations, whereby the UK Government consults with civil society to ensure their feedback is included in and on MEL processes. GAPS note that the UK Government's Annual Report has taken a new format and we appreciate the greater country focus. However, as GAPS has outlined before, the format for the UK Government Annual Report changes every year. This makes it almost impossible to track changes, challenges and progress in the implementation of the UK NAP over time.

Recommendations

The UK Government should:

- Develop a **timebound plan for implementing the recommendations from the initial process evaluation and shadow report**, including concrete actions to revise the implementation of the current NAP (not just to inform the development of future NAPs).
- Commit to an **impact evaluation in the midline and final evaluation in 2020**. This should be published publicly in line with previous commitments to transparency. **All evaluations should be based on meaningful consultation** with women's rights organisations and women-led civil society.
- **Standardise the annual reporting format**, allow space for reflections on how NAP implementation has changed based on learnings from previous Annual Reports and use consistent indicators.

Consultation and Meaningful Participation

In 2019, the UK Government funded GAPS and its partners¹² to conduct consultations in NAP focus countries ahead of the Preventing Sexual Violence in Conflict (PSVI) International Conference¹³ and the 20th anniversary of UNSCR 1325 in 2020. GAPS welcome the UK Government's continued investment in consultations with women and women rights organisations in fragile and conflict-affected states. This is the first set of Women, Peace and Security consultations funded by the UK Government outside of a NAP development process and demonstrates an important commitment to ensuring that Women, Peace and Security decision-making and activities are rooted in the rights, needs and experiences of women and girls affected by conflict. The findings provide evidence that the international community should move on from commitments and resolutions to concrete and resourced plans to implement the Women, Peace and Security agenda in full. As a result of the consultation, GAPS and its partners published [the 10 Steps: Turning Women, Peace and Security Commitments to Implementation](#) report, providing clear recommendations based on the consultations findings¹⁴.

The consultations that took place this year built upon the learning outcomes of the 2017 UK Government funded consultations for the development of the current UK NAP, how to ensure that women meaningfully engage with and influence decision-making processes. As a result, GAPS and several GAPS members¹⁵

¹² ASUDA; Afghan Women's Resource Centre; CARE International UK; Community Initiative for Development Organization (CIDO); Legal Action Worldwide; Together We Build It; UNFPA; Witness Somalia; Women's International League for Peace and Freedom (WILPF); Women for Women International UK; Women's Rights Advancement and Protection Alternative (WRAPA)

¹³ Due to be held in November 2019; since postponed.

¹⁴ GAPS (2019) [The 10 Steps: Turning Women, Peace and Security Commitments into Implementation](#)

¹⁵ Amnesty International UK; Saferworld; Womankind Worldwide; Women for Women International UK

launched the Beyond Consultations tool, a self-scoring resource for governments and organisations conducting consultations with women and women's organisations in FCAS to ensure that the process provides an opportunity for women to meaningfully engage. The UK Government endorsed the tool at the launch.

Recommendations

The UK Government should:

- Continue to **invest in consultations**, following up on and **implementing** the recommendations from **the 10 Steps Report: Turning Women, Peace and Security Commitments into Implementation**.
- **Embed the use of the Beyond Consultations tool into government policy and training** for conducting consultations in FCAS and should ensure that the **tool is disseminated and recommended** for use across the UK government, including posts, country offices and missions.
- **Create spaces for women's meaningful participation** at all levels of decision-making and in commitments and actions resulting from them, this **includes the PSVI International conference** and COP26.

CASE STUDY: Yemen in Focus.

Yemeni women played a central role in the Yemen uprisings in 2011. Since the war broke out in 2015, insecurity and displacement has risen as well as increasing patterns of gendered violence which has been inflicted upon them. Yemeni women have developed new forms of communal and inclusive resistance to tyranny and militarised environments. Yemeni women are at the forefront of the humanitarian response, they are active in local mediation efforts, creating peacebuilding initiatives and sustaining their communities and families. However, Yemeni women face systematic marginalisation by national and international actors from the formal peace process, and their initiatives and inputs remain invisible.

The current Special Envoy to Yemen Martin Griffiths, assumed his role in March 2018 and has since then attempted to convene pre-negotiation consultations that gather warring parties. One round of consultations was held in Geneva in September 2018 but eventually failed. The second round of consultations, which generated the Stockholm Agreement, was held in Sweden in December 2018. Women's participation was very limited to only one woman out of 20 delegates taking part in the official consultations. The Special Envoy's office has established the Women Technical Advisory Group (WTAG), which is composed of 8 Yemeni women leaders that advise the Special Envoy's team around key priority issues and seek to mainstream a gender perspective into these issues.

It is important that the UK Government upholds its commitments to women and girls' rights and their meaningful participation in Yemen as a penholder for Women Peace and Security in the Security Council. This can be done by adopting a holistic and participatory approach to support Yemeni women's participation in policy making processes, political transition and peace negotiations, from grassroots levels to international spaces. The UK Government should advocate for the inclusion of a 30% quota for Yemeni women in delegations of Track 1, 1.5 and 2 peacebuilding and peace talks. The UK should support the protection of Yemeni women civil society leaders and human rights defenders by opening borders and developing urgent protection programmes for WHRDs at risk and apply political pressure on other countries to do the same.

Conflict Prevention and Root Causes

GAPS welcome the UK Government's recognition that gender sensitive conflict analysis is needed to promote gender equality. GAPS also acknowledge that the Stabilisation Unit is updating the Guidance Note on Conflict

Analysis to ensure a stronger gender lens and hopes it will be published soon. Participatory gender-sensitive conflict analysis is central to conflict prevention and seeks to unveil the gendered drivers of conflict, harmful gender norms and power dynamics that enhance exclusion, while mapping out the actors that can fuel conflict and promote peace. Moreover, any joint analysis produced needs to be followed-up by sustained accompaniment, from staff at regional desks as well as gender experts and with women's civil society organisations in the specific context, to ensure it is meaningfully integrated into policy and programming design, implementation and monitoring, evaluation and learning. Adequate funding should be specifically allocated to posts, country offices and missions and civil society for this accompaniment and implementation.

The UK Government should prioritise addressing gender drivers of conflict as the basis of any policy and programmes in FCAS to enhance conflict prevention and strengthen the sustainability of any peacebuilding initiative, while tackling gender inequalities, preventing gender-based violence and promoting women's meaningful participation. GAPS reiterate its concern that the NAP has elevated Preventing/Countering Violent Extremism (P/CVE) to a strategic objective rather than looking holistically at conflict prevention. This risks instrumentalising women's rights organisation's and the Women, Peace and Security agenda as well as diverting limited resources. This is exemplified by the publishing of the only NAP Guidance Note to-date on P/VE. While it is necessary to analyse the root causes of P/CVE, it is limiting to reduce conflict prevention to P/CVE and not all forms of conflict.

Recommendations

The UK Government should:

- Prioritise **undertaking joint participatory gender and conflict analysis** in all conflict affected contexts with government officials, local government and civil society, including women led organisations and diverse actors who would otherwise be excluded, to inform their policies and programmes in order to prevent further conflict and facilitate a more sustainable and inclusive peace. This **analysis should form the foundation of country specific strategy development processes, programme and project development and national strategies and policies** such as the 2019 Strategic Defence and Security Reviews or aid strategies.
- Ensure that **all staff members are regularly trained in gender and conflict analysis**, including gender and conflict advisers, thematic experts and teams at regional desks and Posts, country offices and missions abroad. **Funds should cover the design of policies and programmes with a strong gender lens** based on the results of the gender-sensitive conflict analysis in collaboration with in-house gender experts and women led organisations in each context.
- **Provide adequate funding for local civil society participation and feedback** in the creation of analysis undertaken, recognising that safe and inclusive consultation of diverse actors in challenging contexts may require greater planning and resourcing.

Women's Rights Organisations and Women's Human Rights Defenders

GAPS welcome the publication of UK's guidelines in support of human rights defenders (HRDs)¹⁶ in September 2019, including the acknowledgement of the specific risks to WHRDs and reference to the NAP. This policy builds on the NAP's recognition that 'civil society remain key partners for the UK, particularly GAPS and our partners in-country, including women's rights organisations and WHRDs'¹⁷. To meet its commitments to women's rights organisations and WHRDs, the UK should move from pilot projects, for example its good work in Syria with WHRDs and go further to develop a human rights defenders strategy that addresses the cross-cutting issues facing women's rights organisations and WHRDs as well as human rights defenders more broadly. This should include tangible action that actively shares power with women's rights organisations and WHRDs as well as funding for individual projects.

¹⁶ FCO, [UK support for human rights defenders](#)

¹⁷ DFID, FCO, MOD, SU, [UK National Action Plan on Women, Peace & Security 2012/2022](#)

In the face of the global pushback on women and girls' rights, the UK should work with like-minded governments from the global North and South and civil society including international organisations and business to build more equitable partnerships that devolve Women, Peace and Security agenda-shaping to women's rights and women-led organisations in FCAS. This requires a political commitment to share power and space with women and girls leading human rights NGOs and defending human rights, beyond consultations to more meaningful dialogue and moving towards partnership. The UK has clear opportunities for gender-responsive localisation in and after major WPS 'moments' in 2020 and through its role at the UN Security Council and major global fora such as Generation Equality. These 'moments' include hosting COP26 and PSVI International Conference in the UK in 2020, supporting the Generation Equality Forum and Action Coalitions and the 20th anniversary of UNSCR 1325. It is essential that women's rights organisations and WHRDs can not only access these spaces but are also equally involved in implementation and monitoring of resulting commitments and actions.

Recommendations

The UK Government should:

- Embed a **commitment to partnership and meaningful consultation** in line with the recommendations in Beyond Consultations across HMG, requiring officials working in or on FCAS to work in partnership with WROs and WHRDs.
- **Facilitate partnerships that begin to remedy the power imbalances between the UK as a major world leader and local women's rights organisations and WHRDs.** This involves a range of actions from creating power-sharing policy spaces such as at the PSVI International Conference, to concrete support such as fast-tracking visas and providing accommodation, travel and logistical support to WROs and WHRDs participating in WPS, peacebuilding and conflict dialogues.
- **Support WROs and WHRD to participate in major 'Women, Peace and Security moments' throughout 2020** and beyond as well as the implementation and monitoring of the resulting commitments such as the Generation Equality Fora in May and July.
- Also see **recommendation 1 in funding.**

The Domestic Component: a missing piece

GAPS welcome references to some limited elements of Women, Peace and Security domestically in the Government's report. It is important that the Government's strengthens collaboration with domestic departments and ensures coherence with domestic-facing strategies tackling gender inequality. The relevance and application of UNSCR 1325 to domestic as well as international policy was emphasised in 2019 by the CEDAW Committee's Concluding Observations¹⁸. In their eighth periodic review of the UK Government, the CEDAW Committee welcomed the UK NAP as a framework for policy internationally but expressed its outstanding concern over a lack of implementation of UNSCR 1325 and its principles domestically, including in Northern Ireland¹⁹. The concluding observations also underline the need for effective access to justice, protection and adequate support for refugees, asylum seeking, migrant and trafficked women, who also are outside the scope of the current UK NAP. This contrasts with the new Ireland NAP which includes domestic commitments to support women and girls affected by the Northern Ireland conflict and the migrant population in Ireland from conflict-affected settings. The CEDAW Committee expressed concern in relation to difficulties refugees, asylum seeking, migrant and trafficked women and girls have in accessing housing and other essential services, which may put them at increased risk of violence and exploitation in the UK²⁰.

¹⁸ CEDAW (2019), [Concluding Observations on the eighth periodic report of the United Kingdom](#)

¹⁹ Government Equalities Office, [The CEDAW Committee's Observation and Recommendations](#)

²⁰ OHCHR, [Eight periodic report submitted by the UK and Northern Ireland under article 18 of the Convention, due in 2017](#)

In Northern Ireland, there is limited evidence of progress in strengthening women's participation in peacebuilding. Many women also continue to feel side-lined in their own families; paramilitary intimidation exacerbates this in some areas²¹. Public sector funding for women's organisations has been cut, and the future of the PEACE programme is uncertain. In addition, Brexit is creating uncertainty and concern across Northern Ireland, and women have emphasised the importance of the Good Friday Agreement to safeguard both the peace process and women's and girls' rights. It can also be noted that Ireland's third NAP, which was launched in June 2019 and includes Northern Ireland within its remit, includes refugees in Ireland in the NAP development consultation process, and sets out a series of actions, including funding for initiatives on women and gender²². Increasingly, donor states are domesticating their NAP, including Finland, the Netherlands, Canada and Ireland. If the UK is to comprehensively meet its Women, Peace and Security commitments, it is essential it does this too. GAPS is concerned that instead the UK is furthering the instrumentalisation of the Women, Peace and Security in service of the counter-terrorism agenda domestically as well as internationally.

Recommendations

The UK Government should:

- **Implement in full the recommendations in the CEDAW Concluding Observations and set out a clear delivery strategy by 2021**, this includes the application of the NAP to Northern Ireland and for refugees, asylum seeking, migrant and trafficked women and girls in the UK.
- **Address the lack of uniform protection and support** for women and girls who are asylum-seekers, refugees and with insecure immigration status from all forms of gender-based violence. This **includes establishing a firewall between reporting, public services and immigration enforcement and ensuring all women, including those with no "Recourse to Public Fund" status can access lifesaving refuges.**

Humanitarian Relief and Response

In 2019, the UK continued to engage in global spaces such as the Informal Friends of Gender group for the Grand Bargain, promoting gender mainstreaming within the humanitarian sector reform process. This international engagement should be matched with increased resourcing and policy coherence to ensure the UK is able to integrate gender equality into all their work in fragile conflicted afflicted states. Similarly, GAPS welcome the renewed engagement on the localisation agenda, including the appointment of a new localisation advisor in Department for International Development (DFID) and participation in the annual global localisation conference in Brussels. However, GAPS remain concerned that DFID grant policies, particularly linked to compliance and risk, put up barriers to effective local partnerships, and funding to women rights organisations and women-led organisations has not kept pace with the localisation rhetoric. GAPS welcomes the UK's funding commitments to prevent and respond to GBV in acute and protracted crises in 2019, including the £67.5 million for Phase 2 of What Works (see Section 1 on Funding), £20 million in multi-year funding for SRHR²³ and £7 million in additional funding to support UNFPA to tackle SGBV in Syria. The UK has not yet committed funding to local women-led humanitarian organisations. With less than 0.2 percent of humanitarian aid going to women-led local organisations²⁴, the UK needs to do more to ensure multi-year, flexible funding is reaching local women-led and women's rights organisations.

²¹ Northern Ireland Women's European Platform (2019), [Northern Ireland shadow report to CEDAW](#)

²² Irish Government (2019), [Ireland's Third National Action Plan on Women, Peace, and Security](#)

²³ DFID, [Healthcare for everyone must prioritise women's sexual and reproductive health rights](#)

²⁴ International Rescue Committee, [Where is the Money?](#)

Recommendations

The UK Government should:

- **Implement in full the recommendations in the CEDAW Concluding Observations and set out a clear delivery strategy by 2021**, this includes the application of the NAP to Northern Ireland and for refugees, asylum seeking, migrant and trafficked women and girls in the UK. **Address deeper issues of women and girls' rights, gender, power and accountability in the humanitarian system.** This could include **continued investment in the VAWG prevention agenda** as well as a **strong gender-sensitive approach at all stages** of the programming cycle including gender considerations in needs assessments, gender-equality based outcomes and indicators, gender and age **disaggregated data**, and **the meaningful participation of women and girls in planning and implementation** phases of humanitarian response
- **Endorse and implement the Grand Bargain's Localisation Workstream Guidance note** on Gender Responsive Localisation and **specifically commit resources and political support to women's leadership in humanitarian and protracted settings**, including exploring funding mechanisms that can reach women's rights organisations directly. This could include the specific commitment of resources and political support to women's leadership within the localisation work stream of the Grand Bargain as well as guaranteeing funding, human resources, capacity building and sharing of power such as by co-chairing humanitarian groups and interagency bodies and processes.
- Support the agency, rights and contributions of survivors of gender-based violence in humanitarian settings by **taking an inclusive, intersectional approach to engaging civil society in the Preventing Sexual Violence Initiative.**

Gender-Based Violence & Violence against Women and Girls

GAPS applaud the UK's leadership as co-chair for the States & Donor Group of the Call to Action over 2018-2019 and their role in the GBV Accountability Framework, created by the Real Time Accountability Partnership (RTAP). Going forward, the UK should work with likeminded actors to ensure that this platform is driving real change through RTAP to ensure new GBV minimum standards are implemented and linked to PSVI. The UK's commitment to action on gender-based violence is evidenced in number of focus countries reporting against this strategic objective (SO3), almost all reporting additional funding for GBV prevention and response²⁵.

The findings of the 2019 UK Government-funded GAPS consultations highlight an acute need to ensure access to justice and holistic support for women and girls²⁶. Participants were clear that access to justice requires a robust legislative framework that tackles all forms of violence against women and girls and addresses the gender inequalities that contribute to the prevalence of violence against women and girls. Survivors and victims of GBV are still routinely failed by processes at national and international level and run the risk of further violence or societal isolation when attempting to access justice. Approaches to justice must be part of broader strategies to address stigma and the gender inequality root causes of GBV. In 2019, the adoption of UNSCR 2467 emphasised the need for a survivor-centred approach to preventing and responding to sexual violence. The urgent need to address impunity for GBV and conflict related sexual violence makes the postponement of the 2019 PSVI International Conference particularly disappointing. However, the UK Government should take advantage of the delay to address concerns around meaningful participation in the conference, both in terms of access and visas and lack of participatory approach to the conference itself, as well as the need for outputs that ensure prevention is comprehensively addressed. The PSVI International conference and resulting commitments and actions must include a truly gender responsive approach to

²⁵ In this year's Annual Report, the UK Government reported its activity in 8 of 9 focus countries against Strategic Objective 3: Gender Based Violence, in addition to Yemen as 'spotlight' country. It did not report any specific UK actions in Nigeria under SO3.

²⁶ Gender Action for Peace and Security (GAPS), [The 10 Steps: Turning Women, Peace and Security Commitments into Implementation](#)

addressing conflict related sexual violence, which includes actively supporting local women leaders and survivors to lead the initiative as well as implement the recommendations in the ICAI report²⁷.

Recommendations

The UK Government should:

- **Ratify the Istanbul Convention**, without reservation, as well as **the Optional Protocol to the Convention on Elimination of All Forms of Discrimination Against Women**
- **Implement the ICAI recommendations in full.** It should ensure the **PSVI International Conference meets best practice in terms of meaningful participation** and has outputs focusing on prevention, as well as guarantees long term support for the strengthening of national justice systems in fragile conflicted affected states, which includes all justice actors, and ensures that survivors are central to the process.
- Continue to **work with governments, other donors and civil society to increase the political will** that is needed to deliver high quality funding for GBV prevention and response, including access to SRHR to counter-balance the impacts of the so-called global gag rule.

Effectiveness, Coordination and Process

GAPS is encouraged by the ongoing collaborative working relationship with the UK Government working group on Women, Peace and Security and the establishment of the Women, Peace and Security Steering Committee established in 2018. We welcome the input that GAPS has had on agenda setting, along with the opportunity to present initial findings from the 2019 global consultations at the most recent Steering Committee meeting as well as other international fora. GAPS look forward to continued participation in the Women, Peace and Security Steering Committee and urges the UK Government to make full use of all internal bodies designed to support internal capacity on Women, Peace and Security . Given the different structures and mechanisms for internal capacity building, it remains key that groups like the Women, Peace and Security Steering Committee have indicators for success as well as space for learning which is translated into change to programmes, policy and implementation.

It is important that all publications, strategies and guidance that support NAP implementation and gender equality in fragile conflict affected states are in the public domain to ensure transparency. GAPS welcome the publication of Guidance Notes 6 on P/CVE and notes that it was the first Guidance Note to be published. GAPS understand that Guidance Note 3 (VAWG) is expected to be published soon. Furthermore, GAPS understand the other Guidance Notes are at different stages of development and some not yet started. It is disappointing that these supporting documents, designed to aid NAP implementation are not all published and complete despite the NAP being in year three of implementation. As this is the third year of the current NAP, it is essential that all supporting documents necessary to deliver meaningfully on the NAP are produced, for example Guidance Notes on the strategic objectives are produced and published as soon as possible. A budget dedicated to NAP implementation would support the timely development of these supporting documents.

Country gender strategies should be developed in consultation with women rights organisations, the Beyond Consultations toolkit is a good resource for this²⁸. There are existing UK Government gender strategies for Afghanistan, Libya and Syria. The UK Government has a draft gender strategy for Nigeria which is in the process of being finalised, and the UK Government has a draft set of cross-mission gender objectives for its work in Iraq, along with a draft WPS strategy. Other country strategies should be developed to complement the implementation of the NAP. Gender strategies for Myanmar and South Sudan should be developed as a priority given the UK Government's plans to highlight work in Afghanistan, South Sudan and Yemen in 2020. These strategies should be published publicly to ensure transparency for the UK Government's partners and

²⁷ ICAI, [The UK's Preventing Sexual Violence in Conflict Initiative- Joint review Jan 2020](#)

²⁸ More information on the Beyond Consultations toolkit to be found here: www.beyondconsultations.org/.

international and national civil society. Gender should also be integrated fully into all conflict, peacebuilding and security policies, programmes and strategies, crucially this includes the current Integrated Review. GAPS hope to work with the UK Government on this. This would benefit from a mapping of upcoming strategy and policy development.

GAPS continue to welcome the Gender, Conflict and Stability training. Training on gender should be integrated into all UK Government conflict training and all staff working in or on fragile conflict affected states should undertake the GCS training. GAPS is pleased to have presented on the MOD Defence Human Security Advisor training and the Gender, Conflict and Stability training, and we are hopeful that this engagement continues. GAPS suggest that gender remains an explicit and core part of the newly named Ministry of Defence (MOD) Human Security Advisor training (previously Gender and Protection Advisor training). Additionally, GAPS welcome the opportunity to give feedback on a draft of the MOD's Joint Services Publication (JSP) 1325, launched in January 2019, and is pleased to be in a similar position for the refresh of the JSP.

Recommendations

The UK Government should:

- Ensure **continuous Gender, Conflict and Stability training** as well as the inclusion of gender in other-related training which all Government officials working in or on fragile conflict affected states and undertake the inclusion of WPS into all UK Government official job descriptions of staff working in or on fragile conflict affected states.
- **Include gender in all conflict, security and peacebuilding policies, programmes and strategies.** This would benefit from a mapping of upcoming country-specific and thematic policies and strategies to identify where gender expertise is required. Crucially, it is **essential that gender and women and girls' rights are included in the Integrated Review.**
- **Develop all future Guidance Notes and country gender strategies in collaboration with civil society organisations,** including from fragile conflict affected states and particularly women rights organisations. For **accountability and transparency, these documents should all be published and made available** on the gov.uk website per precedent set by the publication of Guidance Note 6.

The UK NAP and the Arms Trade Treaty

The Arms Trade Treaty (ATT) is the first legally binding international agreement which makes the connection between gender-based violence (GBV) and the arms trade. GAPS commend the UK for its role in the development and adoption of the ATT. However, GAPS have concerns about its implementation and recognises several areas in which the UK Government can take a stronger leadership role in setting an ATT-abiding international standard.

According to the Department for International Trade, the UK is the second-largest arms exporter in the world, with the government authorising arms export licenses worth a record £14 billion in 2018²⁹. It is however of enormous concern that the UK's largest customer for military equipment is the Kingdom of Saudi Arabia, and that through this relationship the UK has made a major contribution to the Saudi involvement in the conflict in Yemen. Since the conflict in Yemen began the UK has sold arms to the Kingdom of Saudi Arabia in excess of £4 billion³⁰ contributing to the escalation of hostilities and violence against women and girls. The Kingdom of Saudi Arabia has been accused by multiple credible sources of committing repeated serious violations of international law and potentially war crimes. If there is a clear risk that a possible arms export might be used to commit or facilitate a serious violation of international law, the UK government is required by national, EU and international law to prevent the transfer. Yet the UK continues to see arms sales to the Kingdom of Saudi

²⁹ Government of the UK, [UK defence and security export statistics for 2018](#)

³⁰ Amnesty International UK, [UK: arms to Saudi Arabia ruling welcomed as 'rare piece of good news for Yemen'](#)

Arabia as unproblematic, despite the June 2019 Court of Appeal ruling that the decision of the UK government to continue licensing exports of military equipment to the Kingdom of Saudi Arabia was unlawful.

The cost of the UK Government's position falls not just on Yemeni civilians. It also undermines the UK's international position as a voice for responsible arms transfer control and hinders meaningful implementation of the ATT more broadly. There is a desperate need for the UK to reverse its position on arms exports to the Kingdom of Saudi Arabia, followed by a public declaration that such a reversal has been found necessary for the sake of the UK's reputation as a responsible arms supplier and global leader in promoting faith in the ATT.

Recommendations

The UK Government should:

- **Regulate its sales of arms in strict compliance with all the provisions of the ATT**, which for example and inter alia involve a markedly different approach to the export of arms at risk of being used in the Yemen conflict. Until the Government can demonstrate it can successfully and consistently abide basic humanitarian and British law in its arms trade processes, it must scale back its involvement in the arms industry.
- **Continue its commitment** to work closely with the US to encourage responsible arms trade policies despite US withdrawal from the ATT.
- **Develop and conduct training on the relationship between GBV, arms and arms transfers for export licensing and diplomatic personnel** working on all disarmament issues, drawing on expertise from the non-governmental sector. It should **conduct effective and transparent gendered impact assessments of international arms transfers** and use findings to inform decisions as part of the arms export licensing process to ensure that UK-sourced arms are not used to commit or facilitate acts of GBV, in accordance with the obligations under Article 7.4 of the ATT. In addition, the UK Government should publish information on the number of occasions gender was a factor in a license refusal or was included as a cautionary factor in a licensing decision.

CASE STUDY: Peacekeeping.

Military

In July 2019, the UK convened the first meeting of the Women, Peace and Security Chiefs of Defence Network to discuss gender perspectives and promote the role of women in peacekeeping. The UK Government reaffirmed its commitment that women will make up 15% of UK personnel on UN peacekeeping missions by 2028. The UK currently has no female military observers, 5 female staff officers (16% of total UK contribution), and 47 female military officers (8.6% of total) in formed units within UN peacekeeping missions. The UK has continued to contribute to the capacity building of UN missions in DRC, Somalia and South Sudan on conflict-related gender-based violence. At the 2019 meeting between the British Secretary of State for Defence and UK-based civil society, attendees discussed the UK using its position in the Security Council, as penholder for Women Peace and Security, to advocate for greater participation of women in peacekeeping. In particular, more mixed patrols. The UK continues to fund the position of Force Gender and Protection Advisor to the UN Mission in the DRC. This has shown tangible improvements in progressing the WPS agenda within peacekeeping missions.

Policing

The representation of female police officers is critical to UN police across the full spectrum of United Nations policing activities. In the UK, the Stabilisation Unit works across various government ministries –

FCO, DFID and MOD – but misses out the Home Office and hence there is no vital input on UK police contribution to peacekeeping. Currently, no police personnel, male or female, from the UK are operating in the field in UN police peacekeeping. Further engagement on this is needed, especially since in 1999/2000 the UK was the 7th largest police contributing country for UN policing. As a comparison, France and Ghana contribute 62 and 357 UN police officers respectively, as of 31 October 2019; and the Republic of Ireland has 12 police officers deployed, with gender parity – 6 men, 6 women. UN Policing has a crucial role to play, and female officers are a vital part of this.

Response to UK Government Report

The UK Government's 2019 NAP annual report outlines that a wide range of Women, Peace and Security work continues to be undertaken across the three departments that implement the UK NAP. It is clear from the report that this work is both led by Government officials in London as well as posts, country offices and missions. GAPS welcome this as it is essential for NAP implementation that the NAP is led, owned and implemented by posts, country offices and missions as well as Headquarters. GAPS welcome the continued inclusion of a forward by the Secretaries of State for Foreign and Commonwealth Affairs, International Development, and Defence. This high-level support is essential for the Women, Peace and Security agenda, particularly as we enter the 20th anniversary of UNSCR 1325.

GAPS continue to welcome the commitment of the officials working on this agenda, particularly the cross-Whitehall Working Group on Women, Peace and Security, as well as the expansion of Gender Advisors in the Foreign and Commonwealth Office and Conflict Security and Stability Fund (CSSF). These dedicated gender experts are key to implementing Women, Peace and Security commitments. The collaborative nature of the way in which the Gender Advisors and Women, Peace and Security teams have approached their work is welcomed and GAPS looks forward to continuing to work with them.

The 2019 UK Government NAP report is structured by the focus countries. This has changed from the 2018 annual report which reported by the Strategic Outcomes. The NAP report structure changes annually. This annual change in reporting structures makes it difficult for year-on-year progress to be assessed. GAPS hope that going forward the same structure can be adhered to which should ensure consistency across annual reports which will assist Government and external organisations in assessing progress.

GAPS has stated previously that it is important for the UK Government to implement all strategic outcomes in all focus countries, unless there a specific reason not to. As the 2019 report is written by focus country, GAPS welcome the inclusion of reporting of each Strategic Outcome within the sections on each of focus country sections. However, this is not comprehensive as there are some focus country sections which do not include reporting on key Strategic Outcomes. For example, the section on Libya does not include any activities on Strategic Outcome 5 on Security and Justice. This is an evident gap in the UK Government's work and/or reporting, which we hope can be addressed in the following three years of NAP implementation. Furthermore, the focus country narrative sections focus heavily on the current status on women and girls' rights and gender equality in each country, rather than solely on the UK Government work. More details on the UK Government's work and less on the country context would be beneficial.

The UK Government annual report remains an activity narrative. There is little information on the impact of the activities, or how different activities and programmes cumulatively advance the Women, Peace and Security agenda and the NAP Strategic Outcomes. As a result, it is difficult to track year-on-year progress at impact level. Most UK Government funded programmes track impact. This information would benefit the annual report and allow for lesson learning for future years of NAP implementation. Such impact reporting would enable lessons learning and assessments of progress been made on Strategic Outcomes since the previous report.

GAPS has previously stated that the UK NAP does not comprehensively address the Women Peace and Security agenda, as a result there are gaps in what the annual report can include. For example, the report does not refer to the UK Government's work on conflict prevention outside of Preventing and Countering Violent Extremism. Furthermore, the sections on Iraq and DRC do not reference support to women's rights

organisations, which is either an omission in reporting, or a gap in implementation. Similarly, there is little reference to work on social norm change which is essential to gender equality. GAPS welcome references to domestic application of the NAP in the 2019 annual report and hopes that the UK Government will build on this and commit to full implementation of the Women, Peace and Security agenda domestically as other donor countries are increasingly doing.

The 2019 annual report is evidence that the UK Government would benefit from tracking its Women, Peace and Security spend, which other donor Governments such as Canada are doing. As a result, the reporting on spend is inconsistent throughout the report. In some cases, spend is outlined alongside activities, in others it is not outlined, and in some cases the specific spend on gender in a broader conflict or peacebuilding programme is referenced. As a result, it is difficult to track the totality of Women, Peace and Security funding which supports NAP activity implementation and impact.

GAPS note the changes to indicators in the NAP annual report. Some of the changes to these are welcome, as is the more comprehensive data reported on compared to the 2018 annual report. However, the indicators focus more on the status of women and girls' rights in the focus countries, rather than the impact of the UK Government's Women, Peace and Security programmes. GAPS welcome the UK Government's plans to re-evaluate its NAP monitoring evaluation and learning as this is required for a robust, transparent and accountable plan.

GAPS was pleased to work with the UK Government in 2019, particularly on the global consultations on Women, Peace and Security across 11 countries with over 250 organisations and individuals which GAPS led with partners and its members. GAPS look forward to working with the UK Government to continue to disseminate the findings of this important body of evidence and hopes the recommendations will be implemented in the UK and globally. GAPS is grateful for the ongoing partnership with the cross-Whitehall Working Group in disseminating and embedding the findings.

As 2020 marks such important women and girls' rights milestones, including the 20th anniversary of UNSCR 1325, GAPS look forward to building on our relationship with the UK Government as it increases its implementation of the NAP and the Women, Peace and Security agenda. This includes our positive working relationship on both international events as well as the development of the UK's own conflict and peacebuilding policies, programmes and strategies, such as the Integrated Review.



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