

# **Assessing UK Government Action on Women, Peace and Security in 2020**

April 2021

## Contents

1. Introduction	1
2. Response to 2020 UK Government Annual Report	1
3. Integrated Review and the new Foreign, Commonwealth and Development Office (FCDO)	3
4. COVID-19 and Women, Peace and Security	4
5. Funding	6
6. UK Capabilities: Monitoring, Evaluation and Learning	7
7. UK Capabilities: Consultation and Meaningful Participation	9
8. Conflict Prevention and Root Causes	10
9. Women's Rights Organisations, Networks, Peacebuilders and Human Rights Defenders	11
10. The Domestic Component: A Missing Piece	13
11. Humanitarian Relief and Response	14
12. Gender-Based Violence and Violence against Women and Girls	15
13. Effectiveness, Coordination and Process	17
14. The UK NAP and the Arms Trade Treaty	19
15. Conclusion	20

## About GAPS

Gender Action for Peace and Security (GAPS) is the UK's Women, Peace and Security (WPS) 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 welcomes 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 (including previous annual shadow reports) which include analysis of, and recommendations for, the UK Government's work on WPS.

## 1. Introduction

With hopes that 2020 would lead to progress in the implementation of the WPS agenda, through the anniversaries of the UN Security Council Resolution 1325 (UNSCR 1325) and the Beijing Platform for Action, a very different year emerged. The COVID-19 pandemic demonstrated national and global inequalities. Responses needed to assess the virus' disproportionate impact on people, communities and countries (inclusive of their intersecting identities such as gender, age, race, sexual orientation and gender identity, religious and ethnic minorities, with due regard to issues of socio-economic position, disability, and relationship status including widows).

Yet, the pandemic resulted in increases in Violence Against Women and Girls (VAWG) and demonstrated the fragility of women's informal employment as they experienced job losses connected to insecure employment status in the informal economy. Health and technology inequality was widespread. Access to personal protective equipment (PPE) and COVID-19 testing, as well as online services, internet access and technological devices, was based on economies rather than 'need'.<sup>1</sup>

In October 2020, the pushback against women's and girls' rights was witnessed at an international level when negotiations on a proposed new WPS UNSCR saw hard-won language at threat of being eroded. The year also saw attacks and threats on Women Human Rights Defenders (WHRDs) as well as the closure of civil society space as COVID-19 legislation was used to restrict civil society. Conflicts continued, as did the sale of arms. However, Women's Rights Organisations (WROs) continued to undertake their vital work. During COVID-19, their roles expanded to providing COVID-19 response services (especially where governments were not or could not) and advocating for more gendered local, national and international responses.

In the UK, whilst pandemic response dominated most of the public and media discussion, the UK began its Integrated Review of Security, Defence, Development and Foreign Policy, merged its foreign affairs and development departments, and cut Overseas Development Assistance (see Section 3). These decisions have the ability to make a significant impact on WPS and the UK's work in this area. Whilst officials working on WPS are dedicated to implementing the agenda, 2021 will provide an opportunity to assess how the changes in government policy and funding impact the UK's work in, and commitment to, the WPS agenda.

## 2. Response to 2020 UK Government Annual Report

GAPS welcomes the UK Government's 2020 annual report on its NAP on WPS. The written and oral annual reports provide important opportunities to assess progress, challenges and areas where commitment and implementation are still needed.

GAPS is pleased that the 2020 annual report has the same format as the 2019 report. This is the first time the annual report has had the same format for two consecutive years during the last two NAPs. Using the same format is essential for progress to be measured year-on-year. However, as a largely narrative annual report it is often difficult to assess progress and challenges. GAPS welcomes the sections on 'Responding to Feedback' and 'Looking Ahead' as these are both useful accountability mechanisms. GAPS is surprised, however, that the 'Looking Ahead' section does not reference the Integrated Review, merger of development and foreign affairs departments, or cuts to ODA. The annual report was an important opportunity to outline the UK's plans on WPS in light of these reviews and decisions.

---

<sup>1</sup> GAPS, [Now and the Future – Pandemics and Crisis: Gender Equality, Peace and Security in a COVID-19 World and Beyond](#)

GAPS has long advocated for the UK NAP to apply domestically as well as internationally. Whilst GAPS welcomes the inclusion of a section on the 'Domestic Application of the UK NAP', and the reference to increased work with the Home Office and Northern Ireland Office, more details on, and commitment to, this work would be beneficial and is needed for the comprehensive implementation of the WPS agenda. GAPS notes that the report is not intersectional in its approach and has limited details on work with the most marginalised women and girls. GAPS also notes that the report does not include any details on decolonisation and anti-racism.

GAPS has stated previously that it is important for the UK Government to implement all strategic outcomes in all focus countries, unless there is a specific reason not to. GAPS therefore welcomes the outline of the UK's work by country and strategic outcome. However, as with the 2019 report, this is not comprehensive as there are some focus country sections which do not include reporting on all strategic outcomes. There are also varying levels of detail of policy and programmatic work. For example, the Myanmar section, Strategic Outcome 5, includes description of security and justice in Myanmar, but only one example of the UK Government's work and funding in this area. Similarly, in the Afghanistan section there is only one example provided in both the Gender-Based Violence (GBV) and participation Strategic Outcomes. Across the report, there is very little information on support to WROs, despite their essential work.

GAPS welcomes the details on the gender strategy in Iraq and the inclusion of WPS in the UK Government's Iraq Country Business Plan. GAPS hopes that WPS will be included in all UK NAP Focus Country Business Plans by the end of 2021. GAPS welcomes the inclusion of Yemen in the annual report, and notes that the UK has a gender strategy for its work in Yemen which includes a commitment to women's and girls' safety being protected. In this context, it is important to note the role of the Kingdom of Saudi Arabia in the conflict in Yemen and that in the second half of 2020, the UK Government started issuing new arms licences to the Kingdom of Saudi Arabia.

In the 2019 shadow report, GAPS reported on the discrepancy in details of UK funding and spend on WPS, with some programme funding amounts being included and others omitted. In the 2020 report there is very little information on financing for the WPS agenda in the UK NAP Focus Countries. For example, there are no details of the specific amounts of funding for programmes in the Democratic Republic of the Congo (DRC) section. This makes assessing the UK's commitment in financial terms almost impossible to assess. GAPS again calls on the UK Government to track its WPS spend, as the Government of Canada does.

GAPS welcomes reporting on the Strategic Outcome of UK Capabilities. However, GAPS notes that the WPS Ministerial Steering Board has not met since May 2019 and hopes this will be resurrected. GAPS welcomes the publication of new Guidance Notes and the NAP baseline evaluation, however, there are significant delays in their development and publication. GAPS hopes that the next UK NAP will be a funded-NAP and therefore resources for the UK's capability to implement it will be available from inception. GAPS hopes that the remaining Guidance Notes will be published in 2021, rather than in the final year of the current NAP.

GAPS welcomes the continued inclusion of indicators in the annual report and believes that the NAP would benefit from a Theory of Change that links the commitments made in the WPS agenda to the UK's Strategic Outcomes, activities and indicators. GAPS therefore welcomes the commitment of the UK WPS officials to developing the NAP's monitoring, evaluation and learning (MEL). GAPS looks forward to continuing to work with the UK Government on this.

GAPS has appreciated working with the UK Government and UN Women on the ‘Now and the Future’ research<sup>2</sup> into the impact of COVID-19 on peace, security and gender equality. As 2021 will see the impacts of the pandemic in greater depth, GAPS looks forward to working with the UK Government to implement its WPS commitments. GAPS hopes that the UK’s upcoming Conflict and Development Strategies will: be developed in a consultative manner; meet the commitments the UK has made to WPS; and ensure a comprehensive approach to implementation.

### **3. Integrated Review and the new Foreign, Commonwealth and Development Office (FCDO)**

GAPS and its members noted with increasing concern the lack of public information that surrounded the recommencement of the Integrated Review in mid-2020, and the absence of formal channels for consultation and civil society engagement. Meaningful engagement (as defined by the Beyond Consultations tool) that is timely, inclusive, transparent and substantive, should be at the heart of both the Integrated Review process and the future foreign, security and development policies and programmes it shapes.<sup>3</sup>

The Integrated Review is an opportunity for the UK Government to reaffirm its commitments to gender equality, the WPS agenda, and the Sustainable Development Goals (SDGs).<sup>4</sup> GAPS welcomes the Minister of State, James Cleverly MP’s remarks at the APPG’s Oral Report to Parliament event in July 2020 on the UK NAP on WPS, that: ‘gender equality is an issue we seek to promote on the world stage...it is an integral part of security and development policy’.

The new FCDO has an opportunity to set an ambitious vision for the next five years. The WPS agenda is an integrated, holistic approach that brings together security, peacebuilding and development. It therefore cuts across all the work of the FCDO and should form the foundation of all the work the department does in FCAS. The new FCDO vision should be one that delivers on the promises of the NAP on WPS and the UK’s commitments to international aid under the International Development Act 2002 and the International Development (Gender Equality) Act 2014. The history of cross-departmental work on WPS shows what is possible. In order to deliver meaningful progress on women’s and girls’ rights, peace and security, the right combination of vision, policies, capabilities and funding is necessary.

---

<sup>2</sup> GAPS, [Now and the Future – Pandemics and Crisis: Gender Equality, Peace and Security in a COVID-19 World and Beyond](#)

<sup>3</sup> Launched in 2019, the [Beyond Consultations tool](#) is designed to support actors to move towards more meaningful engagement with women in fragile and conflict-affected states (FCAS). This is in response to feedback that many consultation exercises tend to be extractive, tokenistic and disempowering. It was created in partnership with over 225 women and WROs across 13 FCAS.

<sup>4</sup> GAPS, [Getting it Right: Putting Women, Peace and Security at the Centre of the Integrated Review](#)

## Recommendations

The UK Government should:

- Put women's and girls' human rights at the core of its new foreign, development and security strategy. The UK has cited itself as a global leader on the rights of women and girls globally, especially in FCAS. The Cross-Government NAP and Department for International Development's (DFID) Strategic Vision for Gender Equality outline the UK Government's commitments to gender equality in peace, security, sustainable development and humanitarian policy. The Integrated Review and the FCDO should commit to these strategies and policies that lead the Government's work in this area.
- Ensure that the Integrated Review builds on capabilities. It is an opportunity for the UK Government to further build on its own capabilities in order to deliver on its commitments to gender equality, peace and security and ensure departmental continuity and policy coherence. It is essential that expertise is maintained and expanded so that the new department is able to build upon good work in the future.
- Increase the proportion of the ODA spend that has gender equality as a main objective and ensure all ODA-funded programmes and projects meet the Organisation for Economic Co-operation and Development's (OECD's) Gender Equality Marker (GEM) 1 requirements. This will address, in some part, the call for 15 per cent of all peacebuilding funding to meet the GEM 2 requirements in having gender equality as the main objective.
- Re-commit to prioritising conflict prevention by: allocating 50 per cent of ODA to FCAS, including those facing protracted humanitarian crises; and increasing targeted funding in peacebuilding and conflict prevention with diplomatic, non-ODA and ODA activities.
- Ensure that the Integrated Review is a consultative process, including with civil society, and institutionalise a meaningful consultation across policy and practice while maintaining high levels of transparency and accountability. This consultation should be sufficiently resourced to ensure diverse civil society engagement with no barriers to participation.

### 4. COVID-19 and Women, Peace and Security

The outbreak of the global COVID-19 pandemic has highlighted the fragility of the health, education, economic, social and political systems.<sup>5</sup> The impact of COVID-19 is deeply gendered and has exacerbated pre-existing gender inequalities. To address the immediate and long-term impacts of COVID-19, a rights-based approach with an intersectional gendered conflict analysis must form any global response and recovery.

The WPS agenda provides an essential framework for analysing and responding to COVID-19 in this way. Through UNSCR 1325 and its associated resolutions, the UK Government has already committed to taking a gender-and-age-sensitive approach to conflict and crises. This also applies to COVID-19. Therefore, all responses should ensure the implementation of existing commitments on gender equality and women's and girls' rights that have been made. While each country, region, city, town and rural area will be impacted

---

<sup>5</sup> GAPS, [Call to Action: Now and the Future, COVID-19 and Gender Equality, Global Peace and Security](#)

differently, responses must acknowledge that no country is unaffected by the crisis and that it will have long-term impacts on communities, the socio-economic system and on conflict and peace dynamics.<sup>6</sup>

There are already worrying examples of unequal access to healthcare. For all solutions that emerge in the next 12-18 months, from reliable testing to vaccines, this unequal access must be rectified. With the current roll out of vaccination programmes, the select few wealthy countries have purchased up to 53 per cent of the vaccines so far and the failure to provide equitable access to the vaccine for all will have long-term consequences and prolong the pandemic.<sup>7</sup> 'No one is safe until everyone is' vaccine nationalism is short-sighted and should be prevented. GAPS welcomes the UK's commitment to the COVAX scheme but it should go beyond to ensure that no one is left behind.<sup>8</sup>

There is also evidence that inequality will reflect the impact of COVID-19 on women's and girls' rights, peace and security. UNSCR 2242 (2015) under its WPS agenda, recognises that 'the global nature of health pandemics' is an aspect of a 'changing global context of peace and security', warranting increased attention and thereby determining that WPS is a critical aspect of COVID-19 responses. The implementation of the UK NAP, therefore, must be central in COVID-19 responses to ensure that national interventions address the issues exacerbated by conflict.

## Recommendations

The UK Government should:

- Ensure rapid gender assessments are taking place in the short-term, and an intersectional gender-conflict analysis in the medium- to long-term, this will ensure that pandemic preparedness, response and recovery, and peacebuilding and security interventions, are adequately gender responsive. Such analysis will help to identify the different impact of COVID-19 on women, girls, men and boys, with close attention on differentials within and between countries, and gendered root causes of conflict.
- Ensure that data is disaggregated by, at least, sex, age, race and disability. Too often in crisis, disaggregated data on the gendered impact is collected long after the crisis begins. Such data on virus contraction, deaths, treatment and programme participants is crucial to understanding intersectional gender differences and the effectiveness of programming. It should be collected immediately and regularly as contexts change.
- Ensure that short- and long-term programming should account for the differential gendered impact of COVID-19 in each context as well as the need for tailored communications and messaging which accounts for country, region and intersectional identities. The use of social and mainstream media for public information messages should be monitored as levels of trust in media and government information varies, as does the misuse of media by authorities. Such monitoring should include any stigmatisation of specific intersectional identities.

---

<sup>6</sup> GAPS and GAPS partners have developed a body of evidence that will enable governments, the international community and civil society to better respond to COVID-19, future pandemics and crises, as well as deliver on their commitments to the WPS agenda. In this participatory research, over 200 organisations in [Afghanistan](#), [Colombia](#), [Iraq](#), [Lebanon](#), [Myanmar](#), [Nigeria](#), [Palestine](#), [Somalia](#), [Uganda](#) and [Ukraine](#) were consulted on the impact of COVID-19 on gender equality, peace and security.

<sup>7</sup> Global Citizen, [The UK Has Mobilised \\$1 Billion to Help Get the COVID-19 Vaccine to Low Income Countries](#)

<sup>8</sup> UK Government, [UK meets £250m match aid target into COVAX, the global vaccines facility](#)

- Ensure inclusive access to technologies. Access to, and use of, technologies should consider the security implications for women’s and girls’ participation and how online decision-making processes and consultations can exclude underrepresented groups. Consideration should be given to alternative ways in which to ensure that those who may be excluded are still heard.

## 5. Funding

The lack of detail on spend in the UK Government annual report continues to demonstrate the need for: a dedicated NAP budget to meet internal-facing commitments (UK capability) on training, process and monitoring; a WPS Fund for implementation of commitments in the Strategic Objectives; and open and transparent tracking and publication of WPS spend. For example, the Conflict Stability and Security Fund (CSSF) supports some of the delivery of the 2018-2022 UK NAP for WPS,<sup>9</sup> but only where the NAP supports the UK’s national security goals. The establishment of the Gender and Human Rights portfolio is welcome and necessary. However, it remains difficult to see the extent to which the fund is in fact advancing NAP-specific commitments and objectives across the remainder of the CSSF. This is because there is not a dedicated WPS fund nor is the gender spend published publicly.

GAPS welcomes the UK Government’s continued funding for programmes to prevent VAWG globally, including announcing funding of £67.5m over seven years for Phase 2 of ‘What Works to Prevent Violence against Women and Girls’, as well as funding for women in mediation. This should be seen in comparison to the amount of ODA provided by the UK Government in 2018, which was £14,546m.<sup>10</sup> However, there is no tracking or reporting of ODA spend on WPS across UK Government departments, so it is impossible to say what percentage of UK ODA is spent on WPS. The Association for Women’s Rights in Development (AWID) has estimated, using figures available from the OECD, that globally only one per cent of gender equality funding is going to women’s organisations.<sup>11</sup>

It is important that the UK upscales its non-project funding to women-and girl-led and women’s and girls’ rights organisations, and more needs to be done to ensure these groups are not adversely affected by counter-terrorism legislation. Evidence shows that the specific profile of women’s and girl’s rights organising and organisations has meant that they experience these requirements in several gender-specific ways.<sup>12</sup> Donor funding needs to work more closely in tune with WROs’ and youth- and girl-led groups’ methods, practices and objectives. WROs and youth- and girl-led groups that work on the intersections of gender, peace and security issues need long-term, core, flexible, transformative funding to bring about real change. It should be recognised that there is a continued need for flexible funding that enables women’s rights organisations, networks, defenders and peacebuilders to carry out their work in an ever-changing context within multiple layers of conflict.

---

<sup>9</sup> DFID, [Statistics on International Development, Provisional UK Aid Spend 2018](#)

<sup>10</sup> DFID, [Statistics on International Development: Provisional UK Aid Spend 2018](#)

<sup>11</sup> AWID, [Towards a feminist funding ecosystem: A framework and practical guide](#). OECD, [Aid in Support of Gender Equality and Women’s Empowerment](#)

<sup>12</sup> UK Government, [Conflict, Stability and Security Fund: Annual Report 2017/2018](#)

## Recommendations

The UK Government should:

- Ensure long-term, core, flexible and accessible funding for WROs, women's rights movements, youth- and girl-led groups, and other civil society organisations (CSOs). This funding should be for the organisations' own self-defined priorities, as well as for responding to opportunities and addressing emerging crises as they arise.
- Move away from short-term, project-based funding to more long-term and consistent funding mechanisms that can support women and girls' increased and sustained participation in peacebuilding at a strategic leadership level. This should be prioritised.
- Minimise reporting burdens on WROs and CSOs. It should also ensure reporting templates are as light touch as possible, simplified and have a standardised process to ensure that relevant information is collected (and made easier to do) with local contexts considered. Initiatives such as the Women Mediators Across the Commonwealth's Strategic Mediation Fund and the Feminist Movement for Change Fund are welcomed (although a longer timeframe would lead to greater access). Through a partner accompaniment approach, these funds offer more flexibility in reporting requirements and, to prevent overburdening, the reporting is in line with the proportion of funds requested.
- Establish a new, dedicated WPS Fund and standalone Funding Framework for WROs. These would support work on gender equality, women's and girls' rights and support NAP implementation, in addition to existing peacebuilding resources. The fund should represent a minimum of 15 per cent of all peacebuilding funds (multilateral and bilateral) as called for by the UN Secretary-General.
- Continue to encourage a holistic approach to the WPS agenda that is not seen in isolation. The outcomes of the Integrated Review (on issues such as global trade policy) should take into account the impact on funding for women's economic empowerment and the importance of this for enabling women engaged in mediation and peace processes to fully access leadership and decision-making roles. Any 'temporary' cuts to UK aid, if these go ahead, should take into consideration the indirect consequences for the UK NAP implementation and related WPS programming and initiatives. Funding related to UK NAP implementation should be protected as it is already very low. A gender-impact assessment should be carried out prior to any final decisions being made to ensure that budgets are gender-responsive and do not result in a negative impact for women's full participation.
- Track and publish all spend in FCAS using the GEM to have more effective, open and transparent reporting on WPS spend. For example, Canada has developed a new method to track WPS spending.

## 6. UK Capabilities: Monitoring, Evaluation and Learning

The baseline/midline process evaluation for the NAP was started in 2018 and due in 2020. GAPS remains concerned that the timeline for the initial evaluation and now the midline evaluation has slipped going into the fourth year of the current NAP. Delays in the evaluations planned for the current NAP have resulted in the planned numbers of evaluations being reduced. The lack of a baseline has made tracking progress on the NAP difficult. GAPS stresses the importance of consistently monitoring and evaluating a NAP's impact as well as its process for meaningful implementation. An impact evaluation would be more beneficial, and GAPS

called for this to take place in 2020 in the 2019 shadow report. It is acknowledged that, due to the various disruptions in 2020 (highlighted elsewhere in this report), this has been a challenging year. However, the UK Government should conduct an impact evaluation as a key priority during early 2021.

GAPS therefore expects the UK Government to have plans and funding for the midline and endline evaluation process, including how it will build on the findings of the initial process evaluation and how it plans to act on recommendations in the implementation of the NAP. For future NAPs, the MEL process should be planned and budgeted for during the NAP's development rather than during implementation.

GAPS welcomes the UK Government's recognition that improvements are required in the existing MEL system. GAPS therefore welcomes the UK Government's open engagement with civil society. This includes the invitation for GAPS to participate and present in a Community of Practice workshop that took place in January 2021. The workshop discussed MEL practices of NAPs globally in more detail, including with other governments such as Ireland and Norway. GAPS looks forward to seeing how its expertise is incorporated both into MEL processes going forward for the current NAP, as well as the MEL framework of the next NAP. It is vital that all MEL processes are inclusive of national CSOs, whereby the UK Government consults with civil society to ensure their feedback is included in and shapes MEL processes.

GAPS welcomes the 2020 annual report format being consistent with the previous year's report. This allows for consistency across annual reports which will assist government and external organisations in assessing progress.

While GAPS welcomes the consistency in the structure, unlike the 2019 annual report, there was no reporting of all key Strategic Outcomes for all of the focus countries in the 2020 annual report. GAPS has stated previously that it is important for the UK Government to implement and report on all Strategic Outcomes in all focus countries, unless there is a specific reason not to. This is an ongoing evidence gap in the UK Government's work and/or reporting. It is hoped that this can be addressed in the following two years of the NAP implementation, as well the new NAP.

Similar to the 2019 annual report, this year's report remains an activity narrative. There is little information on the impact of the activities, or how different activities and programmes cumulatively advance the WPS 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 lessons learning for future years of NAP implementation and processes. Such impact reporting would enable lessons learning and assessments of progress made on Strategic Outcomes since previous reports. The current activity narrative makes it almost impossible to track changes, challenges and progress in the implementation of the UK NAP over time, as well as the impact that can be attributed to the UK Government's NAP and implementation. A standardised, impact and evidence-based approach will help for better tracking of the UK's progress on its WPS activities.

## Recommendations

The UK Government should:

- Develop a comprehensive time-bound plan for implementing each recommendation from the initial process evaluation and latest shadow report, including concrete actions to revise the implementation of the current NAP (not just to inform the development of future NAPs) based on the recommendations.
- Commit to an impact evaluation in the final evaluation in 2021. This should be published publicly in line with previous commitments to transparency. All evaluations should be based on meaningful consultation with WROs, youth- and girl-led groups and women- and girl-led civil society.
- Standardise the annual reporting format, by keeping a consistent format for annual reporting to Parliament, and keep the same indicators throughout the NAP period. This will allow for better progress tracking and give space for reflections on NAP implementation.
- Ensure that future MEL plans for NAPs are costed and funded. This includes accounting for human resources to carry out MEL work.

## 7. UK Capabilities: Consultation and Meaningful Participation

GAPS welcomes that the UK Government has continued to invest in consultations with women in FCAS. This includes funding GAPS and GAPS members (through the UK CSSF) to conduct key projects based on principles of meaningful engagement and consultation, such as [‘The Key to Change’](#) and [‘Now and the Future – COVID-19, Pandemics and Crisis’](#). However, GAPS is concerned that forthcoming cuts to ODA may impact on the UK Government’s commitment to meaningful engagement and consultation. The UK Government should continue building on its commitment to consultations to date by institutionalising meaningful consultation across policy and practice. The current context of COVID-19 should also be considered (for example, restrictions to travel and the lack of access to the internet due to poor infrastructure) which has created additional barriers to meaningful consultation.

Meaningful consultation must be grounded in the practical application of gender-sensitive conflict analysis tools and methodologies. This requires the UK Government to provide practical tools, guidance and resources to its staff and implementing partners. This will support the cross-government use of gender-sensitive conflict analysis to prioritise the identification and transformation of gendered causes of conflict and violence. The analysis can strengthen UK Government and partner capacity to better target their WPS efforts and respond more flexibly to changes.

## Recommendations

The UK Government should:

- Continue to invest in consultations, following up on and implementing the recommendations from ['The 10 Steps: 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. 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 and girls' meaningful participation at all levels of decision-making and in commitments and actions resulting from them. This includes at key global fora throughout 2021 (such as Generation Equality Forums, G7 Summit and COP26) through collaborative partnership models, ensuring accessible information and providing funding to support participation.

## 8. Conflict Prevention and Root Causes

GAPS welcomes the UK Government's commitment to ensuring that gender-sensitive conflict analysis is needed to promote gender equality in FCAS. An example of this is the Stabilisation Unit, which has recently updated its internal guidance on applying a gender perspective to the Joint Analysis of Conflict and Stability (JACS).

GAPS continues to advocate for making gender-sensitive conflict analysis central to conflict prevention – as it not only identifies gendered drivers of conflict, harmful gender norms and power dynamics that enhance exclusion, but maps out the actors that can fuel conflict and promote peace. It can also help to prevent further conflict and leverage opportunities for sustainable and inclusive peacebuilding. This analysis should also be mandatory within the development and review processes of: all country business plan development processes; all JACS; and country strategies and policies (such as the Integrated Review or any new strategic framework for ODA). Gender-sensitive conflict analysis should take place at the start of any new policy or programming process and be regularly reviewed.

While conflict analysis, and in some cases gender analysis, is carried out to inform programme design and implementation, there continues to be a need to conduct integrated gender-sensitive conflict analyses systematically in UK policy and practice. The analysis is a starting point, and needs to be followed up by sustained accompaniment (from staff as well as gender advisers) to ensure it is meaningfully integrated into policy and programming design, implementation and MEL.

The increase in WPS spending announced by the Joint Funds Unit was welcome. Such increases and targets should be in place across ODA. Funds should be specifically allocated to include gender-sensitive conflict analysis in all programmes funded through this lift-up by posts, country offices and missions. This should ensure WROs are at the forefront of analysis development and programme implementation.

The UK Government should prioritise addressing gender drivers of conflict as the basis of any policy and programmes in FCAS. This would enhance conflict prevention and strengthen the sustainability of any peacebuilding initiative, while tackling gender inequalities, preventing gender-based violence and promoting women's and girls' meaningful participation. GAPS reiterates 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 WROs and the WPS agenda, as well as diverting limited

resources. 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:

- Require all implementing partners to conduct gender-sensitive conflict analysis within all programmes funded as part of the UK WPS spending increase, as well as broader programmes in all FCAS. These should be participatory and include diverse state and non-state actors (including civil society and women- and girl-led organisations who would otherwise be excluded) in order to inform policies and programmes.
- Ensure that all staff working on conflict are regularly trained in gender-sensitive conflict analysis (particularly gender and conflict advisers, thematic experts and teams at regional desks and posts, country offices and missions abroad). Funds should include gender-and-age-responsive policies and programmes that are designed based on the results of the gender-sensitive conflict analysis and in collaboration with in-house gender advisers and women- and girl-led organisations in each context.
- Provide adequate funding for local civil society and women's and girls' organisations to participate and feedback in the analysis processes – recognising that it may take greater planning and resourcing to ensure the safe and inclusive consultation of diverse actors in challenging contexts.

## 9. Women's Rights Organisations, Networks, Peacebuilders and Human Rights Defenders

GAPS welcomes the publication of the UK's guidelines in support of human rights defenders (HRDs) in September 2019, including the acknowledgement of the specific risks to WHRDs and reference to the NAP.<sup>13</sup> This guideline 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'.<sup>14</sup>

To meet its commitments to WROs and WHRDs, the UK Government should move from pilot projects (for example its work in Syria with WHRDs) to develop a HRDs strategy. This strategy should address the cross-cutting issues facing WROs and WHRDs, as well as HRDs more broadly. It should include tangible action that actively shares power with women's rights organisations, movements and WHRDs, as well as funding for individual projects.

There is a global pushback on women's and girls' rights. Therefore, the UK should work with like-minded governments from the 'global North and South' and civil society (including international organisations) to build more equitable and just partnerships that devolve WPS agenda-shaping to women's rights and women and girl-led organisations in FCAS. This will require a political commitment to share power and space with women and girls who are leading human rights NGOs and movements, and defending human rights – moving beyond consultations to more meaningful dialogues and ultimately partnerships.

---

<sup>13</sup> FCO, [UK support for human rights defenders](#)

<sup>14</sup> The Guardian, [British government takes global lead on violence against women and girls](#)

The UK has clear opportunities for gender-and-age-responsive localisation in and after major international moments during 2021. These include some events postponed from 2020, including the Generation Equality Forum (and the Action Coalition on Gender Based Violence, co-led by the UK) and COP26, as well as the upcoming UK-hosted G7 Summit. It is essential that WROs and WHRDs have access to these spaces and can meaningfully engage and influence the discussions. But they must also be equally involved in the implementation and monitoring of resulting commitments and actions.<sup>15</sup>

There is also little to no financial support to assist and strengthen WHRDs and WROs. This is a problem for the development of the sector, for human rights advocacy and for education. The international community has committed to supporting an independent and strong civil society. What has been demonstrated, however, is a clear lack of direct funding to WROs and CSOs which impacts their ability to undertake essential and transformational work. A properly funded civil society sector would be able to strengthen gender equality and human rights and bring about real change.

## Recommendations

The UK Government should:

- Commit to funding WROs and women's movements for their: provision of essential services; vital role in advocacy, transformational change and movement building; and their role in achieving women's and girls' rights. See recommendation 1 in funding.
- Lead by example and champion language on the protection of WHRDs domestically and internationally, as well as making way for an internationally recognised coordinated work that establishes a protection mechanism for HRDs.
- Ensure the safety and protection of WHRDs, calling for partner governments across the globe to put in place legislation that protects WHRDs from violence by state and non-state actors (as part of national and international anti-GBV policies and resourcing) with clear indicators to track violations and necessary protection.
- In line with the recommendations in Beyond Consultations, embed a commitment to meaningful participation and consultation across the UK Government, requiring officials working in or on FCAS to work in partnership with women's rights organisations and movements and WHRDs. The UK Government should also recognise that safe, inclusive, non-extractive consultation of women and girls in challenging contexts may require greater planning and resources.
- Support WROs, women's rights movements, WHRDs and adolescent girls to meaningfully participate in major 'WPS moments' throughout 2021 and beyond, as well as in the implementation and monitoring of the resulting commitments (such as the Generation Equality Fora in March and June).
- Facilitate and compensate for safe travel. If this requires obtaining a visa to the UK, the UK Government should facilitate entry clearance applications and fast-track visas. Providing safe travel and logistical support to WHRDs is crucial and represents a fundamental mode of practical assistance.

---

<sup>15</sup> DFID, FCO, MOD, SU, [UK National Action Plan on Women, Peace & Security 2018-2022](#)

There should also be cooperation between UK Government departments, especially the FCDO and Home Office/Entry Clearance Officers, so that invitations for WHRDs to the UK are not stymied.

## 10. The Domestic Component: A Missing Piece

GAPS welcomes the addition of the small section on ‘Domestic Application of the UK National Action Plan’ in the 2020 annual report. However, the annual report would have benefitted from actual evidence on the steps taken by the FCDO to strengthen collaboration with domestic departments, such as the Home Office. It is important that the NAP is coherent and complements domestic strategies tackling gender inequality, peace and security. The UK Government should also strengthen its collaboration with domestic departments, as other donor countries do (including Ireland, the Netherlands, Canada, Norway, Sweden and Germany).

The relevance and application of UNSCR 1325 to domestic as well as international policy was emphasised in 2019 by the Committee on the Elimination of Discrimination against Women’s (CEDAW’s) Concluding Observations.<sup>16</sup> This is particularly important in the context of recovery and rebuilding from COVID-19, as the crisis has had particularly significant impacts on the most marginalised groups (including refugee, migrant, asylum seeking and trafficked women and girls). Many women and girls in these groups do not have recourse to public funds, and the suspension of services during the pandemic has increased their exposure to destitution, violence and exploitation. In addition, focused action is required to ensure women and girls in these groups have effective access to justice, which although outside the scope of the current NAP could be taken forward within a wider WPS agenda. The limitations to judicial processes during the pandemic have reduced access for the most marginalised groups, thus increasing barriers that contribute to risks for women and girls.

In Northern Ireland, women continue to have a limited role in peacebuilding. The return of the Northern Ireland Assembly had little impact on peacebuilding initiatives. The ‘New Decade, New Approach’ agreement<sup>17</sup> secured the return of the Northern Ireland Assembly and Executive in January 2020. The only reference to women, girls and gender equality in the agreement is mention of a Gender Strategy as part of a suite of social inclusion strategies. Work on a new Gender Strategy was initiated in autumn 2020 and as a welcome step, involves a co-design process with civil society.<sup>18</sup>

The COVID-19 crisis has deepened the inequalities experienced by women in Northern Ireland, including increasing the unpaid work burden that limits women’s and girls’ ability to participate in public life and reducing opportunities to engage in it. Civil society<sup>19</sup> (as well as the Northern Ireland Assembly All Party Group on UNSCR 1325, Women, Peace and Security) has actively highlighted the lack of priority given to gender equality and women’s and girls’ needs in the Executive’s response. This response highlights the urgent need for strengthened gender competence among policy and decision-makers.

In addition, Brexit continues to create uncertainty and concern across Northern Ireland. The impact of the new relationship remains uncertain, and practical issues, from accessing goods to organising services and safeguarding frontline workers, have been initial priorities, in a context where the trade deal does not cover services. A dedicated mechanism for monitoring non-diminution of rights in line with the Northern Ireland

---

<sup>16</sup> CEDAW (March 2019) [Concluding Observations on the Eighth Periodic Report of the UK and NI](#)

<sup>17</sup> [New Decade, New Approach agreement](#) 8 January 2020

<sup>18</sup> Department for Communities, [Timetable for development of Social Inclusion Strategies](#)

<sup>19</sup> Women’s Policy Group NI (July 2020) [COVID-19 Feminist Recovery Plan](#)

protocol of the Withdrawal Agreement has been put in place through the Equality Commission for Northern Ireland and the Northern Ireland Human Rights Commission. There is significant interest in how this will work.

It is important that the UK Government's future initiatives are based on a comprehensive understanding of the impact on the WPS agenda of the COVID-19 crisis in Northern Ireland and the new relationship with the EU (including new immigration rules).

## Recommendations

The UK Government should:

- Undertake a comprehensive analysis of the impact of COVID-19 and the new post-Brexit-relationship with the EU on the domestic context for WPS and set out a clear response as a matter of urgency; this includes application of the NAP to Northern Ireland and for refugees and asylum-seeking, migrant and trafficked women and girls in the UK.
- In the recovery from COVID-19, address the lack of uniform protection and support for women and girls who are asylum-seekers, refugees and with insecure immigration status. This includes amending the Domestic Abuse Bill to establish a firewall between reporting, public services and immigration enforcement,<sup>20</sup> and ensuring all women, including those with no 'Recourse to Public Fund' status can access lifesaving refuges.
- In preparation for the next UK NAP, begin working with domestic UK departments who have an important role in the WPS agenda. This is to ensure that the UK is fully implementing its commitments and is in line with other donor country NAPs who have a domestic focus (including Ireland, the Netherlands, Canada, Norway, Sweden and Germany).

## 11. Humanitarian Relief and Response

During 2020 the COVID-19 pandemic exposed existing weaknesses in national and global systems, structures and leadership, with devastating impact for those already living in contexts of humanitarian need and at risk of crisis. The humanitarian system has, as such, been presented with new challenges of unprecedented scale and complexity. The UK provided important funding for COVID-19 global humanitarian response activities. However, the UK's civil society/INGOs space was largely critical of the UK's approach to disbursement – with only 10 per cent of this spend being channelled to INGOs and frontline delivery organisations (namely through the UK's Rapid Response Facility), and the majority of costs being directed to multilaterals.

This is despite evidence highlighting that local organisations – and specifically WROS – continue to be best placed in responding rapidly, and leading responses that meet the gendered and intersectional impacts of crises. This has been evidenced in relation to COVID-19 specifically, where women and girls have been hardest hit by the secondary impacts of the virus, including: its psychosocial effects; increased exposure to GBV; and food insecurity and economic insecurity due to a higher likelihood of their working in the informal

---

<sup>20</sup> The recommendation for a 'firewall' was endorsed by the Joint Committee on the Domestic Abuse Bill in 2019. In December 2020, a joint investigation by Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS), the College of Policing (CoP) and the Independent Office for Police Conduct (IOPC) as a result of a police super complaint submitted by Southall Black Sisters and Liberty found that the current arrangements in relation to information sharing were causing 'significant harm to the public interest' and recommended that the police immediately stops sharing status information of victims of domestic abuse with immigration enforcement.

sector. Of concern, from both a humanitarian and public health perspective, there has been a significant diversion of funds and political attention away from crucial – and lifesaving – health, sexual and reproductive health and rights (SRHR), and specialist protection services. While the UK has positively continued to highlight its rhetorical commitment to gender equality and SRHR in 2020, this has not translated into tangible or significant funding in these services and work.

Beyond COVID-19, the main (and already existing) drivers of humanitarian crises continue, including the impact of climate change and weather-related disasters, and ongoing conflict and violence. Women and girls continue to be disproportionately impacted in these contexts. While the UK continues to be one of the largest global humanitarian donors, it is essential that amid a context of UK Aid being under threat, the UK continues to protect and invest in principled and inclusive humanitarian action, alongside a more proactive response to avert humanitarian crises, including gendered early-warning analysis.

COVID-19 has highlighted the importance of the UK coherently connecting its work on humanitarian preparedness, response and recovery to related portfolios and investments in conflict and WPS. This should be supported by a coherent policy and programming approach that speaks to this triple nexus across the humanitarian, development and peacebuilding agendas. The approach should align humanitarian policy goals captured in the IASC, Grand Bargain, Charter 4 Change, Global Goals, SDGs and UN climate commitments, and connect in with the UK's global leadership role on WPS. WROs and feminist, youth, humanitarian and climate networks are already working in these ways, and the international and western humanitarian community must follow these organisations in terms of nexus-focused advocacy, policy and programming that also takes an intersectional feminist approach to humanitarian aid.

2021 remains a crucial year for the UK in terms of influencing humanitarian priorities and women's and girls' rights globally. The UK has a vital role and opportunity to showcase the UK's leadership and ramp up support for women's leadership and WROs – through its hosting of G7 and COP26, its leadership of the GBV Action Coalition, and as part of the WPS and Humanitarian Action Compact, and as the humanitarian community faces the official end of the Grand Bargain.

## Recommendations

The UK Government should:

- Prioritise multi-year recovery funding on the secondary impacts of COVID-19, with a focus on women's and girls' protection, participation and leadership.
- Invest in policy and programming approaches that cut across the humanitarian-development-peace nexus and address the underlying and interlinked drivers of conflict, crisis and gender inequality.
- Use its crucial influencing opportunity (within G7, COP26, the ending of the Grand Bargain and within the Generation Equality Forum) to drive measurable commitments for gender equality and women's and girls' rights in conflict affected states, and ramp up support for women's and girls' leadership, WROs and youth- and girl-led groups.

## 12. Gender-Based Violence and Violence Against Women and Girls

As Co-Chair of the GBV Action Coalition for the Generation Equality Forum, the UK has a unique opportunity in 2021 to scale up quality GBV prevention, protection and response services in conflict affected states. It can

achieve this by securing adequately funded, accountable commitments to roll out GBV minimum standards in all crisis responses.

The UK has a track record of donor leadership through the ‘Call to Action to End GBV in Emergencies’ and the ‘GBV Accountability Framework’, as well as funding improving data and evidence on GBV and conflict through the ‘What Works’ research programme. This already contains the blueprints for meaningful actions to prevent and respond to VAWG in conflict settings. Yet GBV remains severely underfunded, with less than 0.52 per cent of the overall Global Humanitarian Response Plan for COVID-19 being dedicated to it.

The UK’s commitment to action on GBV is evidenced in a number of focus countries reporting against this Strategic Objective (SO3). It is crucial that GBV remains a strategic priority across Ambassadors and High Commissioners leading new FCDO integrated strategies and business plans in conflict affected states, and that they continue to implement improved financial transparency and tracking to elucidate the percentage of UK ODA spent on GBV.

The findings of the 2019 UK Government-funded ‘10 Steps’ report highlight an acute need to ensure access to justice and holistic support for women and girls.<sup>21</sup> Participants were clear that access to justice requires a robust legislative framework that tackles all forms of VAWG and addresses the gender inequalities that contribute to its prevalence. 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. The UK could show real leadership by strengthening women’s and girls’ capacities to be effective humanitarian actors. It could also support and fund the inclusion of WROs and women- and girl-led groups working in their communities in the planning of the local crisis response and GBV prevention and response interventions.

Approaches to justice must be part of broader strategies to address stigma and the root causes of GBV that are a result of gender inequality. In 2019, the adoption of UNSCR 2467 emphasised the need for a survivor-centred approach to preventing and responding to sexual violence.

The UK Government should take advantage of the delay in the 2019-planned Preventing Sexual Violence in Conflict Initiative (PSVI) conference to address concerns around meaningful participation in the conference, both in terms of access and visas and lack of participatory approach, as well as the need for outputs that ensure prevention is comprehensively addressed.

The PSVI conference and resulting commitments and actions must include a truly gender-responsive approach to addressing conflict-related sexual violence. This includes actively supporting local women leaders and survivors to lead the initiative and implement the recommendations in the Independent Commission for Aid Impact (ICAI) report.<sup>22</sup>

---

<sup>21</sup> GAPS, [The 10 Steps: Turning Women, Peace and Security Commitments to Implementation](#)

<sup>22</sup> In this year’s annual report, the UK Government reported its activity in eight of nine focus countries against Strategic Objective 3: Gender Based Violence, in addition to Yemen as a ‘spotlight’ country. It did not report any specific UK actions in Nigeria under SO3.

## 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 on PSVI in full. It should ensure the PSVI international conference meets best practice in terms of meaningful participation of women and girls and has outputs focusing on prevention, as well as guarantees long-term support for the strengthening of national justice systems in FCAS, which includes all justice actors, and ensures that survivors are central to the process.
- Work with governments, other donors and civil society through the GBV Action Coalition for the Generation Equality Forum to secure accountable commitments to increase the amount of high quality funding for multi-sector and integrated GBV prevention and response interventions. These interventions should be accessible to, and inclusive of, women and girls and their organisations in FCAS, in all their diversity. Ensure synergies between the GBV Action Coalition and the WPS and Humanitarian Action Compact.
- Create and strengthen accountability to women and girls living and working in humanitarian emergencies, including as a means to counter sexual harassment, exploitation and abuse. Institutionalise safe, confidential and inclusive opportunities for women and girls to report violence, including sexual exploitation and abuse. Reporting mechanisms, safe spaces, case management and psychosocial support services should also be accessible to all girls, including adolescents.

### 13. Effectiveness, Coordination and Process

GAPS is encouraged by its ongoing collaborative working relationship with the UK Government's officials' in the Working Group on Women, Peace and Security. GAPS welcomes being able to input on agenda setting at meetings. However, GAPS notes that the Ministerial chaired WPS Steering Group has not met since May 2019, despite a commitment to it in the NAP. This is an important accountability mechanism, inclusive of senior officials and experts in civil society and academia, to progress the WPS agenda. Given the different structures and mechanisms for internal capacity building, it remains key that groups like the WPS Steering Group meet and have indicators for success, as well as the space for learning which can, in turn, improve programmes, policies and implementation.

Supporting documentation to enable the implementation of the NAP has been significantly delayed. The UK Government has entered the fourth year of its NAP without the tools to enable and facilitate effective implementation of the Strategic Outcomes. By the end of 2020, three years after the NAP was published, only one of the six Guidance Notes has been publicly published, meaning that external implementers have access to only one of six Guidance Notes. GAPS understands that only four Guidance Notes were available to government officials by the end of 2020.<sup>23</sup> Future NAPs and their success ride on supporting documents, such as Guidance Notes, being published with the NAP itself, so officials and implementers know how to translate the high-level Strategic Objectives into policy and practice. It is crucial that the Guidance Notes are

---

<sup>23</sup> Four guidance notes have been published publicly [here](#), since 10/02/21. The Guidance Notes on SO5 (S&J) and SO1 (Decision-making) are underway and being finalised respectively and will be published this year.

published as soon as possible. and that future NAPs are published with such supporting documents. This requires dedicated funding and human resources for the NAP, without which supporting documents that facilitate effective implementation will be as delayed as they have been in this NAP.

Country gender strategies exist for most NAP focus countries. They are critical to the implementation of the NAP and should be developed in consultation with WROs and the Beyond Consultations tool is a good resource for this.<sup>24</sup> Gender strategies for all NAP focus countries should be developed as a priority. Future NAPs should commit to UK gender strategies for all NAP focus countries within six months, and these strategies should be integrated within UK Government Country Business Plans. These strategies should be published publicly to ensure transparency for the UK Government's partners and 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 hopes to work with the UK Government on this.

COVID-19 has had a severe impact on UK Government WPS training. Whilst there is a WPS training online, the intensive Gender Conflict and Stability has not moved online. GAPS hopes that the Gender, Conflict and Stability training can restart as soon as possible, and that future NAPs commit to training all staff who work in, or on, FCAS. Training is essential for NAP implementation and should be provided systemically and comprehensively, including tailored training that is appropriate to roles and responsibilities, and contexts.

The UN Security Council passed Resolution 2538 in 2020 which explicitly addresses the role of women in peacekeeping and points to their indispensable role in increasing the overall performance and effectiveness of peace operations. In 2020, the UK Government also sent UK troops to the UN Mission in Mali as a demonstration of the UK's commitment to peacekeeping. UNSCR 2538 calls on the UK and all member states to strengthen their collective efforts to promote, publicly encourage and advocate for women's involvement. There is clear direction on how to increase the deployment of uniformed women in peacekeeping and a call for mixed engagement teams and women being included in all areas and at all levels of peacekeeping operations. GAPS will seek to monitor the UK Government's commitment to its NAP Strategy Objective on peacekeeping.

## Recommendations

The UK Government should:

- Ensure the Gender, Conflict and Stability training restarts as soon as possible and that gender is included in all other related training which all Government officials working in, or on, FCAS undertake. Ensure the inclusion of WPS into all UK Government official job descriptions of staff working in, or on, FCAS.
- Include gender in all conflict, security and peacebuilding policies, programmes and strategies, including the Integrated Review. 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's and girls' rights are included in the Integrated Review.
- Develop all future Guidance Notes and country gender strategies in collaboration with CSOs, including from FCAS and particularly WROs. Ensure that future NAPs are published with Guidance Notes and that gender strategies are developed within six months. For accountability and transparency, these

---

<sup>24</sup> GAPS, [Beyond Consultations tool](#)

documents should all be published publicly and made available on the gov.uk website per precedent set by the publication of Guidance Note 6.

## 14. 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 GBV and the arms trade. GAPS commends the UK for its role in the development and adoption of the ATT. However, GAPS has 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 latest UK defence statistics,<sup>25</sup> in 2019 the UK was still the second largest arms exporter in the world based on orders/contracts, though the value fell to £11 billion (still the second highest ever). Despite the fact that for the second half of 2019 and the first half of 2020 the government was not issuing new licences for exports to the Kingdom of Saudi Arabia, deliveries continued under extant licences. In the second half of 2020 the UK Government started issuing new licences again. It is 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 billion contributing to the escalation of hostilities and VAWG.<sup>26</sup> 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 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. In their latest report, the Group of Eminent Experts on Yemen stated that the conduct of all parties to the war in Yemen continued to be appalling.<sup>27</sup>

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.<sup>28</sup>

---

<sup>25</sup> UK Government, [Official Statistics UK defence and security export statistics for 2019](#)

<sup>26</sup> Murray, J. 2020. [UK faces new legal challenge over arms sales to Saudi Arabia](#)

<sup>27</sup> "Group of Eminent Experts reiterates its concern about third States transferring arms to parties to the conflict in Yemen in blatant disregard of the documented patterns of serious violations of international humanitarian law and human rights law in the conflict to date. The Group believes that they are failing in their responsibilities to ensure respect for international humanitarian law, and that some States may be violating their obligations under the Arms Trade Treaty. Furthermore, such support may amount to aiding and assisting internationally wrongful acts in contravention of international law." (Para. 102) in Human Rights Council (2020), Situation of human rights in Yemen, including violations and abuses since September 2014, September-October (<https://www.ohchr.org/Documents/HRBodies/HRCouncil/GEE-Yemen/2020-09-09-report.pdf>)

<sup>28</sup> UK Government, [UK defence and security export statistics for 2018](#). Amnesty International UK, [UK: arms to Saudi Arabia ruling welcomed as 'rare piece of good news for Yemen'](#)

## Recommendations

The UK Government should:

- Regulate its sales of arms in strict compliance with all the provisions of the ATT, regardless of the recipient or destination, as opposed to current practice which for example involves a markedly different approach to the export of arms at risk of being used in the Yemen conflict. Until the UK Government can demonstrate it can successfully and consistently abide basic humanitarian and UK law in its arms trade processes, it must scale back its involvement in the arms industry.
- Maintain a close relationship with EU Member States post-Brexit in terms of: operating within the same framework when making export licensing decisions; elaborating a more detailed approach to assessing risks that arms exported might be used to commit or facilitate GBV or serious acts of violence against women and children; and promoting the application of high standards by other countries and in other regions.
- 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.
- 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. This is 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.

## Conclusion

GAPS continues to welcome the collaboration between the officials in the cross-Whitehall Working Group on WPS and GAPS, and acknowledges the constraints that COVID-19 brought to NAP implementation in 2020. The lack of global implementation of the WPS agenda has impacted COVID-19 responses globally, notably with a lack of gender responsive emergency response plans and their resulting impact. Implementation of the WPS agenda requires change in systems, processes and the way in which people work.

Now the UK NAP is in its fourth year, it is essential that the foundations of the NAP are developed and published, including all six Guidance Notes and the process evaluations.

GAPS hopes that 2021 will mark an upscale in NAP implementation and looks forward to the full implementation of the WPS agenda, including the recommendations in this report. This will benefit from the resumption of the WPS Ministerial Steering Group, training, funding, and integrating gender equality into the UK-hosted global events in 2021. GAPS looks forward to continuing to work with the UK Government and hopes it can build on and significantly upscale work to date.

**gaps** [ ]  
uk  
gender action for peace and security  
[www.gaps-uk.org](http://www.gaps-uk.org)  
[info@gaps-uk.org](mailto:info@gaps-uk.org)