

Assessing UK Government Action on Women, Peace and Security in 2022

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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

2021 was the year to build upon reflections made in the 20th anniversary year of UN Security Council Resolution (UNSCR) 1325 and the opportunity for meaningful implementation of the Women, Peace and Security (WPS) agenda. However, this did not materialise in the lives of women and girls, and new and complex challenges arose.

For example, in Afghanistan the situation continues to be devastating for Afghan women and girls. We must reflect on and learn lessons from this situation going forward. Prior to the seizure of power, much progress had been made on WPS, due to the hard work of women's rights activists and civil society within the country. The UK had focused its efforts and support on Afghanistan and claimed that this work was a success under the WPS framework. However, this was quickly and disastrously undone by the Taliban in 2021. The UK Government and the international community must take this moment to pause and reflect on the failures of militarism and the UN Security Council's policies and inaction in Afghanistan, and ensure this does not happen again.

Despite the UN Secretary-General António Guterres highlighting the "direct link between increased investment in weapons and increased insecurity and inequalities affecting women"¹ in his opening speech to the Open Debate in 2021, the UK continued to deprioritise disarmament and ignored calls from women peacebuilders and civil society alike to comply with the Arms Trade Treaty (ATT). This is contrary to the lessons from Afghanistan and from other conflicts in 2021 such as Myanmar and Ethiopia. While the UK's WPS and foreign policies are incongruent, women and girls in these and other fragile and conflict-affected states continue to face violence, disenfranchisement, and violations of their rights. The representation of women in all levels of decision-making – from local councils to diplomatic delegations – should not be a photo opportunity or an appeal to an unevidenced more peaceful nature of women, but should instead be an appeal for women's voices not to be ignored and for women to not be side-lined in processes that affect them.

In the UK, despite the clear increase in the global need for transformative funding that responds to continuing emergencies, the government persisted with plans to cut Overseas Development Assistance (ODA) to 0.5% of GNI in 2021, which has had a devastating impact on global programming for women and girls. The Foreign Secretary has since announced a commitment to restoring the women and girls' development budget to what it was before ODA cuts, and announced a new fund to tackle sexual violence against women and girls in conflict. While we welcome this reinstatement of crucial funding, there also must be full reinstatement of the 0.7% target as this would positively impact all areas of development and humanitarian funding that supports women and girls. Funding for women and girls must be considered holistically and be wider than just the narrow focus of sexual violence in conflict.

While the UN Climate Change Conference (COP26) of the UN Framework Convention on Climate Change (UNFCCC), hosted by the UK Government in 2021, was also an opportunity to discuss how the climate crisis has a disproportionate impact on women and girls, women were not represented adequately, and civil society organisations (CSOs) were locked out of important discussions. The problem of increasing barriers to access for important actors in 2021, such as women's rights organisations (WROs) and CSOs, and the lack of effective and

¹ UN Security Council, [Meeting on Women, Peace and Security 2021](#)

meaningful consultations ahead of important events must be resolved to guarantee the rights of women and girls globally.

While this will not be GAPS's final shadow report on this National Action Plan (NAP), it remains a crucial report for the UK to listen to and to embed its recommendations into the next NAP during the development process this year. Lessons on Afghanistan, the arms trade, domestication, process, and funding must be taken seriously. As we expect the publication of a number of cross-government strategies on international development, security, and women and girls in the year ahead, the UK Government must use these recommendations to make real progress and prioritise WPS, and make good on the commitments made.

2. Response to the 2021 UK Government Annual Report

GAPS welcomes the UK Government's 2021 Annual Report on its progress on implementing the 2018–2022 NAP on WPS. It outlines a wide range of WPS work that continues to be undertaken across the two departments that implement the UK NAP. The written and oral annual reports provide important opportunities for both government and civil society to assess progress, challenges, and areas where commitment and implementation are still needed.

GAPS welcomes the format of the report being maintained for a third consecutive year. This has been crucial for consistent monitoring of progress, and allows GAPS and civil society to compare the government's work year-on-year. We are pleased with the addition of the 'Responding to Emerging Issues' section which not only highlights key issues, but also notes the Integrated Review and connects the UK's WPS work with other policy areas, such as climate change response. However, the report is made less effective by removing the previous 'Responding to Feedback' section which was present in the 2020 Annual Report. As these annual reports serve as a reflection of the UK's work and follow previous years of shadow reports, it would have provided the opportunity to not only recognise the recommendations from civil society but also to note where the UK has adapted its WPS work in response to feedback.

GAPS is very pleased to see the continued inclusion of a forward by the Secretaries of State for Foreign, Commonwealth and Development Affairs, and Defence. This high-level support is essential for the WPS agenda and demonstrates the importance that the UK Government places on this work. However, despite this obvious ambition towards WPS and the commitment to 'put women and girls at the heart of the UK's foreign and development policy', GAPS notes that the aid cuts in 2021 were undertaken despite warnings from impact assessments of the negative effect it would – and then did – have on the lives of women and girls, which contradicts this stated goal. The report was an opportunity for the Government to reflect on the impact of aid cuts on women- and girls-focused programming and report on any mitigation undertaken. GAPS would have found useful a breakdown of this for each focus country, and without this, it is difficult to measure the impact of cuts and understand the challenges going forward. The recent announcement of an uplift in funding for women and girls has been focused on conflict-related sexual violence and does not repair the cuts which affected wide-ranging development and humanitarian programming.

Furthermore, the 2021 Annual Report stated that tackling violence against women and girls (VAWG) was a particular focus, but GAPS questions the theory of change behind this. The four pillars of the WPS framework of participation, protection, prevention, and relief and recovery are all key to successfully implementing this agenda, and must all be recognised. On this point, the WPS Ministerial Steering Board has still not met (since May 2019, as GAPS flagged in our 2020 Shadow Report), but the Preventing Sexual Violence in Conflict Initiative (PSVI) Steering Board has continued to meet regularly. This exemplifies the broader concerns we have about the prioritisation of PSVI and conflict-related sexual violence, over a focus on the WPS agenda as a whole.

The ‘Focus Countries’ section of the report is a crucial aspect of the Annual Report and GAPS is pleased that this has continued for three consecutive years. However, each country section still does not report on all the seven Strategic Outcomes set by the UK Government for its WPS work. As focus countries, these should set the example for other country programmes to follow by demonstrating the UK’s holistic approach to WPS. Some of the descriptions are also particularly short and do not explain the work in reasonable detail; for example, the section on ‘SO1: Decision-making’ in the Democratic Republic of Congo. In the next report, GAPS hopes to see reporting on all Strategic Outcomes for each country, as we have stated previously. GAPS also welcomes the inclusion of Yemen as a spotlight country for the second year in a row, particularly as the humanitarian situation worsened in 2021. However, it is vital that within this there is recognition of the role of the Kingdom of Saudi Arabia in the conflict in Yemen, and how the UK Government has contributed to this by the continued issuing of arms export licences to Saudi Arabia.

As noted above, the description of the work undertaken within each focus country does not mention the cuts to ODA that affected most of these countries, especially as budgets are predicted to further decrease as figures from DevTracker show.² Many of the programme reports referred to technical, capacity, and financial support provided by the UK Government and as the financial support was reduced in 2021, GAPS had expected to see this reflected in the report.

GAPS welcomes the inclusion of the ‘Indicators’ section as it allows for annual tracking of the WPS situation in each country with figures. However, the indicators chosen are almost wholly about the status of women and girls’ rights in the focus countries, rather than the impact of the UK Government’s WPS programmes. This belies the purpose of a report on the UK’s progress on implementing its NAP and means that we are unable to confirm how the UK’s efforts and financial commitments contributed to any improvements or changes. The only exception is indicator 7.5 on ‘Training and capacity-building of UK Government staff to implement the WPS commitments’, although the data is not country-specific and is not linked to an outcome. Overall, the 2021 Annual Report continues to be mostly an ‘activity style’ narrative of the UK’s work and would benefit from focusing on the direct and measurable impact of the UK’s WPS programming. The next NAP should include a robust 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) and tracking of WPS spend.

GAPS also strongly welcomes the Conflict, Stability and Security Fund’s (CSSF) Gender, Peace and Security Portfolio and the initiatives funded through this new portfolio. GAPS has long advocated for flexible core funding to be

² DevTracker, [Aid by Location](#)

given directly to WROs working in fragile and conflict-affected states and incorporating inclusive and intersectional approaches to WPS programming. We look forward to seeing the outputs of this work, including the research and toolkits which we hope will benefit the WPS sector globally.

The 2021 Annual Report continues to include a section on ‘Domestic Application of the UK National Action Plan’, as GAPS has welcomed previously. However, this section provides limited information and while this reflects the level of domestic application of the NAP in 2021, GAPS would still encourage further information and hopes to see this as a significant feature in the new NAP. This section discusses peacebuilding in Northern Ireland but in the rest of the UK we see a focus again on VAWG above other areas of WPS. This focus is particularly around policing as a means to tackle VAWG, alongside strengthening justice and support systems. It is not clear how the Tackling VAWG Strategy in the UK is closely linked to the current NAP on WPS, the WPS framework, and other global work.

GAPS has appreciated working with the UK Government on the CSSF Women, Peace and Security Helpdesk which has continued in 2022 and which will provide high-quality evidence-informed analysis and expertise to staff across the UK Government. In this and as the UK develops its new NAP, GAPS looks forward to working with the UK Government to implement its WPS commitments.

3. Case Study: Afghanistan in Focus

Since the takeover of power by the Taliban in August 2021, Afghanistan has been experiencing a severe political and economic emergency, worsening and ongoing intersecting issues of poverty, COVID-19, climate change and instability, and the effects of years of conflict. Women in Afghanistan are facing the brunt of the current devastating crisis, with specific gendered impacts and increased misogynistic controls to their lives and work. Women activists, journalists, human rights defenders, humanitarians, civil society and women-led organisations in Afghanistan are now facing threats of violence and the removal of hard-won rights – to work, to assemble, to travel freely, and much more.³

Prior to the takeover, Afghanistan was the first country in the region to have a National Action Plan, despite little implementation at national and local levels. The women’s rights movement has called for the UK to engage with WROs, CSOs, and activists who are still in Afghanistan and with the diaspora to decide on the next steps in terms of WPS in Afghanistan, in order to sustain the work they advanced for years. The UK Government has a key role to continue to advocate for the application of WPS within Afghanistan and to carefully monitor the current situation. Alongside the diplomatic and political means available to the UK Government, humanitarian assistance must be continued and expanded to support Afghan people living in poverty, especially women and girls who have no access to their own finances or routes of income generation now that they have been excluded from the workforce. While we welcome the UK’s commitment to providing £286 million of UK Aid to Afghanistan via the Humanitarian Pledging Summit that took place in March 2022, there must be a clear plan to ensure that the proposed aid which is to focus on women and girls is reaching them directly through WROs, with no additional conditions or scrutiny.⁴

³ UN Women, [Women’s Rights in Afghanistan: Where are we now?](#)

⁴ UK Government, [UK co-hosts Afghanistan Pledging Conference 2022: Foreign Secretary’s speech](#)

Women must be allowed to participate in all areas of society, including in decision-making positions and political office. The Ministry of Women's Affairs was disbanded in the wake of the takeover and the UK Government should push for this to be reinstated. The UK Government should insist on the inclusion and representation of women in all delegation meetings, on all party sides, and in any future government of Afghanistan. The current structure has no women, while prior to August 2021 28% of the parliament and 29% of the civil service was made up of women.¹ While the UK Government attended talks with the Taliban in Oslo in January 2022, only a handful of Afghan women activists and WROs were able to attend, and many were locked out of these talks due to financial and physical constraints. It is vital that prior to attending any high-level talks, the UK Government consults with women and CSOs in Afghanistan, advocates for their attendance, and ensures their views are represented at all levels.

The UK Government should emphasise the role of Afghan women's organisations and aid workers as essential and non-negotiable in conducting needs assessments and providing humanitarian aid, as well as in peacebuilding efforts and efforts that enhance women's rights and gender equality. This will require the inclusion of women, in order to reach and provide the required support to women and girls in need within Afghanistan.⁵ Moreover, the UK Government should support the establishment of mechanisms to protect Afghan women from reprisals resulting from their activism. It should also actively leverage all multilateral avenues to safeguard Afghan women and girls and increase funding and support to peacebuilding, humanitarian, and longer-term development programmes, ensuring they are women-led, gender responsive and conflict sensitive. Funding must be flexible and long-term to respond to rapidly changing needs, including immediate humanitarian aid such as food, water and shelter, and lifesaving health and standalone GBV services including Women and Girls Safe Spaces, safe houses, and case management providing mental health and psychosocial support. A rapid response funding scheme could also be established to ensure funding arrives quickly and is not blocked by political decisions. Funding should be allocated especially for local and women's organisations to cover core costs and staff salaries, as well as security and relocations.

Despite the serious and imminent threat to their lives and safety, Afghan women continue to speak out against the injustices perpetrated by their de facto government.⁶ Those who are no longer safe to remain in Afghanistan must be supported to evacuate, if necessary, through safe and accessible routes to the UK, with assured eligibility for UK resettlement schemes including the right to work. Many other Afghan women's activists, peacebuilders and journalists who have worked to support human rights and stability in Afghanistan are unable to flee or have chosen to stay. The UK Government should do all it can to support local and women's organisations, activists and journalists through its aid portfolio and diplomatic action. The UK Government must listen to the experiences and recommendations of these women and to women that continue to work from within Afghanistan on women's rights as the pre-eminent experts in the context.

The UK Government has worked with women human rights defenders and activists in Afghanistan for many years to support their work and to help deliver the WPS agenda and other UK Government priorities. Some examples of women human rights defenders working with and supporting the UK Government's work on WPS include, but

⁵ Due to cultural norms, many male aid workers will not be able to speak with or interact with women as recipients of aid, and women are not generally permitted to participate in the community meetings where aid design and distribution is being organised.

⁶ Amnesty International, ["They are the Revolution", Afghan Women Fighting for their Future under the Taliban Rule](#)

are by no means limited to: UK-funded consultations to inform UK Government action on how to implement its existing commitments on WPS, and to assess the impact of COVID-19 on women and girls living in fragile and conflict-affected states (FCAS), including Afghanistan; multiple events related to the Preventing Sexual Violence Initiative (PSVI) in London and Kabul, including the main Global Summit in London and Kabul; and a workshop on the UK's NAP on WPS hosted at the British Embassy in Kabul. The work of women human rights defenders, organisations and networks made a material difference to both the UK's delivery of its mission and objectives in Afghanistan, and to also achieving gender equality and upholding women's rights in conflict on an international scale.

For many years, women and WROs in Afghanistan have highlighted the need to address the root causes and gendered drivers of insecurity and conflict through gender-conflict analysis and consultation⁷ in order to achieve any sustainable peace. The UK must honour this important contribution and support Afghan women in preserving the 20 years of hard-won achievements in gender equality. It is vital that the UK Government upholds its commitments to women and girls' rights and their meaningful participation in Afghanistan. Afghan women's rights must be explicitly recognised, respected and protected by its government and this should be a priority for engagement and expansion of aid by the UK Government.

⁷ GAPS, [The 10 Steps: Turning Women, Peace and Security Commitments to Implementation](#)

Recommendations

The UK Government should:

- **Increase flexible, core, and long-term funding and support to local and women’s organisations** in Afghanistan, and to humanitarian, peacebuilding, and longer-term development programmes to respond to the needs and rights of Afghan women and girls. The UK must also ensure that aid committed under the Humanitarian Pledging Summit directly reaches women and girls.
- **Design, undertake, and participate in meaningful consultations** with Afghan women in and outside of Afghanistan, and **ensure participation in decision making** and any dialogue on the future of the country for both women remaining in Afghanistan and those who have had to leave.
- **Ensure safe routes for individuals and their dependents** wanting to flee to reach safety and respond to the gender-specific needs of Afghan women, girls, and other minorities.
- **Expedite and grant immediate protection** to new and existing asylum claims and family reunification applications, and **widen access to family reunification** to include broader categories of family members and dependents, as they access the Afghan Citizens Resettlement Scheme, Afghan Relocations and Assistance Policy scheme, and asylum.
- **Repeal the Nationality and Borders Act 2022.** The inadmissibility rules introduced in January 2021 should also be suspended as a matter of urgency.

4. Funding

UK Aid Cuts

In 2021, for the first time since 2013, the UK did not meet its UN target of spending 0.7% of GNI on ODA. This decrease in allocation for ODA to 0.5%, which equates to around £4 billion in aid cuts, was attributed to the economic impact of the COVID-19 pandemic.

UK Aid cuts have had a severe and disproportionate impact on women and girls. The first round of aid cuts in 2020 saw an ODA reduction of £1.1 billion.⁸ According to analysis focusing on data from the International Aid Transparency Initiative, reductions to aid in 2020 included: 37% to family planning; 48% to reproductive healthcare; 10% to funding WROs; 40% to education; and 18% to humanitarian aid.⁹ The UN Population Fund, to

⁸ Development Initiatives, [Cuts to the UK 2020 Aid Budget: What IATI data tells us](#)

⁹ CARE International, [UK Government decisions to cut UK Aid are disproportionately falling on women and girls](#)

which the UK is the largest donor, reported an 85% reduction in funds, which is estimated to have had severe consequences for women and girls' ability to access contraceptives and reproductive health supplies. This funding would have helped prevent a quarter of a million child and maternal deaths, 14.6 million unintended pregnancies, and 4.3 million unsafe abortions.¹⁰

The Equalities Impact Assessment published in March 2022 recognised that the proposed reduction of ODA to 0.5% of GNI would lead to a significant reduction of funding to programmes aimed at reaching those 'furthest behind', including women and girls, and warned that the proposed reductions to specific gender interventions, including violence against women and girls and sexual and reproductive health and rights, would have a negative impact on wider efforts to advance gender equality.¹¹ Despite this, the UK Government went ahead with its plans, which saw a £4.6 billion cut to ODA in 2021. Analysis of estimated funding between 2019 and 2022, compared to 2015 to 2018, indicates that gender equality programming is being severely affected by these cuts, and women and girls will suffer the most from cuts to critical focus areas. As a result, an estimated 20 million women and girls will not be reached by programming, made up of:

- 700,000 fewer girls supported by girls' education programmes
- 2 million fewer women supported by humanitarian assistance
- 8 million fewer women and girls supported by nutrition interventions
- 9 million fewer women supported to access clean water and sanitation.¹²

The lack of consultations and impact assessments undertaken to determine how these cuts could pose long-term negative impacts on women and girls does not align with the government's Strategic Vision for Gender Equality, nor its NAP for WPS, which seeks to implement structural changes.

The 10% cut to WROs that address inequalities and provide support to marginalised women and girls has and will continue to greatly hinder those organisations' abilities to offer vital and life-changing services, and to bring about positive structural change in their efforts to achieve gender equality. WROs and programmes that work on advancing gender equality require sustainable and flexible funding. Such funding will enable them to plan strategically in the long-term, which will in turn provide the UK Government with an opportunity to continue to play a key role as a champion of gender equality and women's rights. There are currently no mechanisms in place to monitor the impact of UK Aid cuts on the WPS sphere, making it harder to assess the true long-term impact on the sector.

In line with UN targets, the UK should commit at least 15% of peacebuilding funds to projects whose principal objective is to address women's specific needs and advance gender equality. In light of the reduction in the international aid budget in 2021, this funding allocation is especially important. Without prioritisation of WPS funding within the remaining budget, the NAP cannot be meaningfully delivered.

¹⁰ UNFPA, [Statement on UK government funding cuts](#)

¹¹ UK Government, [Equalities Impact Assessment](#)

¹² CARE International, [UK Government decisions to cut UK Aid are disproportionately falling on women and girls](#)

Funding for Women, Peace and Security and Gender Equality

As we enter the final year of the current UK NAP on WPS, the UK Government is yet to set up a dedicated budget for the implementation of the NAP, which has been consistently advocated for by civil society. With no dedicated budget, UK capability on training, process, coordination, and monitoring cannot reach the level required for the successful implementation and delivery of this NAP. GAPS strongly welcomes the Gender, Peace and Security portfolio within the CSSF, which not only meets the recommendation for a dedicated WPS fund but is also a positive example of designing programmes with core and flexible WPS funds. We look forward to seeing how this complements the mainstreaming of WPS in all other portfolios and in country posts within the FCDO and the CSSF, and how it targets specific unmet needs.

GAPS welcomes the Foreign Secretary announcement of £22.4 million in new funding to help stop violence against women and girls in conflict globally, and the ambition that this indicates. However, this amount does not offset the substantial reduction in budget due to the aid cuts. Furthermore, the entirety of this funding was granted to large multilateral organisations, with only £3 million going to the UN Trust Fund to End Violence against Women and Girls, which funds small civil society and women-led organisations. The Association for Women's Rights in Development estimated that globally only 1% of gender equality funding goes to women's organisations directly.¹³ When WROs do receive funding, it is often restricted to donor priorities and agendas. GAPS has long advocated for long-term, core, flexible funding to enable WROs to undertake their vital work, and the UK Government should commit to ensuring this is available to local and grassroots WROs. This type of flexible funding enables WROs and women human rights defenders to carry out their work in ever-changing contexts within complex layers of conflict, which is essential to counter the gendered impacts of crises and emergencies. To ensure such funding can be delivered, consideration should also be given to reducing the application process and reporting burden. Simplifying grant proposal requirements and ensuring dynamic compliance and due diligence measures will recognise the often challenging and constantly changing context that WROs and CSOs work within, as well as their capacity and resources.¹⁴ Evidence has shown that this type of funding would support WROs' vital work in providing front-line services in FCAS, building peace, and promoting long-term development and change, as well as increasing and sustaining their participation in peacebuilding at a strategic leadership level. It will also allow for WROs to assess their own needs, decide on their own priorities, and deliver on the WPS agenda more effectively. Local WROs working in FCAS are the experts on WPS and are chronically under-resourced; the UK Government can make real change happen by offering long-term and core funding.¹⁵

To measure the impact of the UK NAP and WPS commitments, there is a need for improved monitoring and tracking systems within the UK Government. Without a dedicated WPS fund or publicly available records of gender programme spending by the CSSF, FCDO and the government as a whole, it is not possible to see how current funding has contributed to the delivery of the UK NAP. Similarly, as aid cuts continue to impact programming in focus countries, it is vital that clear monitoring and evaluation tools are needed so the overall impact on the

¹³ AWID, [Where is the new money for feminist organising? New analysis finds that the answer is alarming](#)

¹⁴ GAPS, [The Key to Change: Supporting Civil Society and Women's Rights Organisations in Fragile and Conflict Affected Contexts](#)

¹⁵ Ibid.

implementation of the NAP can be measured. This is a crucial aspect of implementation of the WPS agenda and without this it will not be possible to make a clear assessment of how the UK has delivered on the objectives of the 2018–2022 NAP. Systematic tracking and reporting across government departments must be a key feature of the next NAP and GAPS looks forward to supporting the UK Government to build this into the new NAP.

Recommendations

The UK Government should:

- **Restore the international aid budget to 0.7% of GNI.**
- **Establish a dedicated WPS fund** to support work on gender equality, women and girls' rights, and women's empowerment work and to 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.
- Take a **holistic, integrated, and context-specific approach** to WPS priorities, themes, and focus areas of funding to ensure donor funding works more closely with WRO methods, practices, and objectives. If donors are to continue project-based funding, WROs that work on the intersections of gender, peace, and security issues will also need long-term, core, flexible, and transformative funding in parallel to bring about real change.
- Ensure that data management systems are sufficient to **track, compile and publish all spending in FCAS using the Gender Equality Marker** to have more effective, open, and transparent reporting on WPS spending, as well as complementing the implementation of other UK commitments, including the Sustainable Development Goals.
- **Break with the presumption of an inherent risk in working with local organisations and peacebuilders** and endorse women peacebuilders' own assessments of risk and implement their mitigation measures as these are likely to be the most efficient solutions.

5. Monitoring, Evaluation, and Learning

The baseline/midline process evaluation of the NAP, which was due to be published in 2019 and then delayed to 2020, remains unpublished. GAPS is concerned, considering this now means that the initial as well as the midline evaluations have slipped into the NAP's fifth and final year, reducing the number of planned evaluations. This also represents a missed opportunity to adapt and refine the NAP to strengthen its effectiveness – in line with both UK commitments to evidence, learning, and accountability as well as international best practice. 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 beneficial, and GAPS called for this in the 2019 and 2020 Shadow

Reports. Such an evaluation – which is more beneficial than a process evaluation – remains undelivered by the UK Government. While GAPS acknowledges the challenges of 2021, the lack of an evaluation, in addition to the UK Aid cuts, makes assessing progress and impact of the NAP difficult.

Reiterating its expectations from the 2020 Shadow Report, GAPS asks that the UK Government puts plans and budgets in place to conduct an in-depth impact and end-line performance evaluation. Such a process should reflect on learnings and set out recommendations on how such learnings will be incorporated in the upcoming NAP. Furthermore, the UK Government should ensure a robust theory of change as well as funding for MEL processes in the development and implementation of the upcoming NAP. This could include the development of performance indicators and more systematic processes for collecting and reporting on contributions towards strategic outcomes across different government departments and funding instruments (such as through Annual Review processes).

As with the previous two years, the 2021 Annual Report does not reflect on the impact of activities or how the WPS agenda is advanced. The report acts as an activity narrative, which poses difficulties in tracking the impact, progress, and challenges in the implementation of the NAP from year to year. Thus, an impact evaluation is crucial to tracking the UK Government’s progress in its WPS activities as the NAP comes into its final implementation year.

GAPS welcomes the consistency in the format and structure of its 2021 Annual Report to the previous years’. The consistency ensures ease of assessing progress of activities across years. However, GAPS recognises that the Government has not reported on all Strategic Outcomes in all focus countries in their 2021 report, as GAPS recommended in their 2020 Shadow Report. It is important that the UK Government 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 Annual Reports for the new NAP.

MEL consultations conducted by the UK Government on the NAP were very limited in their scope and had limited involvement of local WROs and CSOs. GAPS reiterates the importance of MEL processes that are designed and built in a participatory manner that is community-led and inclusive of CSOs and WROs, and in which their feedback is included in and shapes the MEL processes for the upcoming NAP.

Recommendations

The UK Government should:

- **Ensure a robust theory of change in the new NAP** that will guide and frame the UK’s WPS efforts. This should explicitly outline the key challenges being addressed by the NAP, what needs to happen for commitments to be delivered, and key assumptions and risks associated with this. This will allow for a strategic and long-term view to reduce the drivers of gender inequality and to understand and

measure the extent to which the NAP is performing as expected. It will also strengthen the evidence base on 'what works' for promoting gender justice in FCAS.

- **Commit to an impact evaluation in the final evaluation of the NAP.** This should be reviewed by the FCDO's Evaluation Quality Assurance and Learning Service to ensure credibility and that it is published publicly in line with previous commitments to transparency. All evaluations and MEL processes should be inclusive of and based on meaningful consultations with WROs, groups led by young people and girls, and civil society led by women and girls.
- **Ensure that future MEL plans and processes for NAPs are costed and funded, and have set timelines** that the UK Government can deliver on. This includes developing a comprehensive time-bound plan for implementing each recommendation from the latest shadow report, including concrete actions to inform the development of the future NAP based on recommendations. The development of proxy indicators can provide a useful tool to measure progress towards overall outcomes on a regular basis, and to take corrective measures as required.
- **Create a standardised format for the annual reports** of the upcoming NAP which ensures consistency for annual reporting to Parliament and keeps the same indicators throughout the NAP period.

6. Consultation and Meaningful Participation

All women have a fundamental right to meaningfully participate in the decisions that frame and impact their lives, particularly in FCAS. Meaningful participation must ensure that women and WROs are fully engaged in decision-making processes as early as possible and that there is space for them. Participation must also be intersectional and ensure that women and girls from gender-diverse backgrounds, with disabilities, from ethnic and religious minority groups, racialised groups, LGBTQIA+ communities, and women from both older and younger generations are consulted.¹⁶ GAPS welcomes that the UK Government has continued to invest in consultations with women in FCAS. In 2019, GAPS and its members produced the Beyond Consultations tool, designed to support actors to move towards more meaningful engagement with women in FCAS.¹⁷ This was in response to feedback that many consultation exercises tend to be extractive, tokenistic, and disempowering. The UK Government endorsed this tool and responded by seeking to improve its approach to consultations.¹⁸

¹⁶ GADN, [Humanitarians and the Women, Peace and Security agenda during Covid-19](#)

¹⁷ GAPS, [Beyond Consultations: A tool for meaningfully engaging with women in fragile and conflict-affected states](#)

¹⁸ UK Government, [National Action Plan on Women, Peace and Security](#)

GAPS encourages the UK Government to continue building on the evidence, research, and resources¹⁹ that GAPS members and partners (including WROs across FCAS) produce. This includes implementing the recommendations outlined in ‘The 10 Steps: Turning WPS Commitments into Implementation’ and investing in future GAPS member-led consultations such as the ‘Now and the Future’ project, which looks at the impact of COVID-19 on gender equality, peace, and security throughout 2020–2021.²⁰ UK Government-funded consultations such as those led by GAPS set an important foundation for setting out how donors and governments should meaningfully consult with WROs and CSOs and inform future funding frameworks and approaches to engagement in decision-making.²¹

GAPS encourages renewed funding for consultation with civil society, particularly WROs, as a priority for ensuring the UK Government meets its commitments to WPS priorities. Meaningful consultation and participation 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 is essential for supporting 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 the UK Government and partner capacity to better target their WPS efforts and respond more flexibly to changes, based on their meaningful engagement with women’s rights experts, activists, and organisations.

GAPS recognises the important progress made towards increasing UK Government technical support and capabilities through the 2020 mainstreaming of WPS in the nine-part virtual training ‘Gender, Conflict and Politics Learning Series’.²² Providing practical tools and guidance will ensure that these learning sessions contribute to strengthening UK Government capacity and gender awareness.²³ However, on the whole, GAPS finds it difficult to assess the integration of gender-conflict analysis and consultation across the implementation of this National Action Plan. While research, learning and guidance is the third key area of the NAP’s capability focus, there has been a significant delay to the publication of the guidance notes needed to accompany and support the UK Government in the implementation of the plan. GAPS is disappointed in this delay and hopes that the guidance notes will be supplied to effectively support the use of gender-sensitive conflict analysis across all aspects of the NAP.²⁴

GAPS is therefore concerned that the failure to institutionalise meaningful consultation in a recognisable and measurable way as an indicator of UK capabilities to conduct gender-conflict analysis will prevent the achievement of the strategic outcomes set out in the UK NAP and undermine the participation pillar of the agenda.

¹⁹GAPS, [The Key to Change: Supporting Civil Society and Women’s Rights Organisations in Fragile and Conflict Affected Contexts](#)

²⁰ GAPS, [The 10 Steps: Turning Women, Peace and Security Commitments to Implementation](#)

²¹GAPS, [The Key to Change: Supporting Civil Society and Women’s Rights Organisations in Fragile and Conflict Affected Contexts](#)

²² UK Government, [National Action Plan on Women, Peace and Security](#)

²³ Ibid.

²⁴ Ibid.

Reflecting on consultation and participation in 2021

Reflecting on the last year, GAPS is pleased that there has been some sustained investment in consultation, participation, and research.²⁵ This funding has the potential to positively contribute both to the participation pillar of the WPS agenda and to the implementation of Strategic Outcome 1 of the NAP, using meaningful consultation to increase the representation and amplify the voices of women in decisions affecting their lives.

Examples of this funding include:

- £1 million to support women mediators across the Commonwealth Network. This funding supports a network of women mediators to increase the participation of women in peace processes, thereby contributing to women's meaningful participation in peacebuilding, at the grassroots and international levels.²⁶
- £250,000 to support GAPS to undertake vital research on the gendered impacts of COVID-19 in FCAS.²⁷ This funding enabled GAPS to produce the series 'Now and the Future: Gender Equality, Peace and Security in a COVID-19 World and Beyond'.²⁸ This research is a good example of how the UK Government can invest in meaningful consultations. GAPS and partners worked with over 200 organisations in Afghanistan, Colombia, Iraq, Lebanon, Myanmar, Nigeria, Palestine, Somalia, Uganda, and Ukraine to identify and understand the impact of COVID-19 on gender equality, peace, and security, and make tangible recommendations for action based on meaningful engagement.
- Funding for the British Peace Support Team supported by the Kofi Annan Peacekeeping Training Centre. This project highlights the importance of gender-sensitive policy and consultation. This opportunity for African mid-level female leaders to develop mentoring skills to support their female colleagues is a good example of where the UK Government has contributed to greater representation and meaningful participation in the security sector.²⁹

The above examples set a constructive precedent for the final year of this NAP and the next NAP. When the UK Government invests in organisations that can contribute towards participation through meaningful consultation, they ensure that women have their voices heard and can share their insight and expertise; that their contributions shape the future of their communities and countries in sustainable ways; that their rights and needs are met; and that their potential is achieved.³⁰

In addition to funding to enable consultation and participation, GAPS welcomes the establishment of mechanisms to create spaces for women and girls to participate at key global fora. In 2021 specifically, we welcome the UK Government's establishment of the Gender Equality Advisory Council (GEAC) for implementing gender-sensitive

²⁵ UK Government, [UK National Action Plan on Women, Peace and Security: Annual Report to Parliament 2020](#)

²⁶ Ibid.

²⁷ UK Government, [UK National Action Plan on Women, Peace and Security: Annual Report to Parliament 2020](#)

²⁸ GAPS, [Now and the Future – Pandemics and Crisis: Gender Equality, Peace and Security in a COVID-19 World and Beyond](#)

²⁹ Ibid.

³⁰ GAPS, [Beyond Consultations: A tool for meaningfully engaging with women in fragile and conflict-affected states](#)

recommendations to the 2021 G7.³¹ The GEAC centred the importance of consulting with WROs for sustaining participation and recognised the racial dynamics of gender policy at the intersection of disability, income, gender, and age.³²

While the GEAC is a productive framework that should be sustained for future G7 presidencies, there is a clear disconnect between the GEAC recommendations and the G7 communiqué. Many recommendations from the GEAC were not translated into the G7 communiqué, which demonstrates the risk of consulting with WROs and failing to implement subsequent recommendations. For example, the G7 communiqué recognised the value of meaningful participation and consultation³³ without detailing funding for achieving it. For significant and tangible outcomes, meaningful consultation and participation must be backed by funding. While some moves towards constructive participation and consultation were evident at the 2021 G7, there has been a distinct absence in the inclusion of consultation of women and girls across other global fora throughout 2021. While the UK Government recognised the important role that women and girls play in addressing climate change and conflict at COP26, there was an absence in meaningful participation for that process.³⁴ The UK Government must therefore bridge the gap between mere recognition of women and girls' meaningful roles in addressing the intersection of climate and conflict with the implementation of including them in discussion.

Within the UK Government's rhetoric, there has been the recognition that the WPS Agenda is a golden thread for all work resolving conflict and on building security and stability, but the prioritisation of meaningful participation and consultation within that golden thread consistently falls short.³⁵ Failure to include women's varied knowledge and voices will limit the effectiveness of the interventions developed and the outcomes achieved. Importantly, meaningful participation is not an end in itself – women should experience the resulting benefits, such as building their own knowledge and experiencing tangible outcomes through their engagement in consultations.

The UK Government should go beyond consultations and prioritise working on equal partnerships with WROs and work on setting up projects that involve equal partnerships with them. This could be achieved by adopting a partnership approach that is based on principles of solidarity and accompaniment of CSOs/WROs, by building mutual, equal, respectful, and committed partnerships with WROs/CSOs and focusing on strengthening each organisation's capacities, giving up space for WROs/CSOs to lead the change they and the communities they work with want to see. This approach involves co-designing all programmes and budgets, providing financial resources for national NGOs' organisational development, facilitating their access to direct funding, and ensuring that programmes respond to the changes they have identified as being necessary.³⁶ This is an important aspect of localising the implementation of the WPS agenda and ensuring that women and girls are leading this work from the start.

³¹ GEAC, [Recommendations of the Gender Equality Advisory Council 2021 to the Leaders of the G7](#)

³² Ibid.

³³ G7, [G7 Foreign and Development Minister's Meeting communiqué](#)

³⁴ UK Government, [Climate action is necessary for international peace and security](#)

³⁵ UK Government, [Women's participation is fundamental to sustainable peace: Lord Ahmad's statement](#)

³⁶ GAPS, [Supporting Civil Society and Women's Rights Organisations in Fragile and Conflict-Affected Contexts: Somalia Report](#)

Recommendations

The UK Government should:

- **Continue to 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.
- **Extend the UK capabilities section of the NAP** to include an isolated section on consultations to ensure that the use of the Beyond Consultations tool moves from recognition into implementation.
- **Embed meaningful participation, informed by the Beyond Consultations tool, into the PSVI conference** in 2022 and in future PSVI interventions. Working with survivors of conflict-related sexual violence must centre their needs in a safe and ethical way informed by meaningful consultations with women from the survivors' contexts.
- Continue to **invest in participatory, intersectional gender-conflict analysis and meaningful consultation** systematically in the design, monitoring and evaluation of all policy and programmes in FCAS.
- **Invest in and commit to long-term partnerships**, which go beyond specific projects, and support the growth of a strong, active, and independent civil society that represents the views of people affected by conflict and advocates for their rights and interests.

7. Conflict prevention and root causes

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 Joint Analyses of Conflict and Stability (JACS), and all country strategies and policies. 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. All conflicts and crises have specific gendered dimensions, and

intersecting issues of climate change and global health threats also have a devastating impact on the lives of women and girls.

Conducting participatory and intersectional gendered conflict analysis is a first and high-priority step in understanding and addressing the gendered drivers of conflict. Whether conducted or supported by the UK Government, analysis should meaningfully include a balance of participants, including national and local government officials and civil society in FCAS, women's networks and organisations, youth, and other constituencies with insight into and agency over conflict drivers who would otherwise be excluded. An intersectional gendered conflict analysis should look at pre-conflict structures, and how those gender and social constructs that existed pre-conflict exacerbated the disproportionate impact of the conflict on different groups, and most specifically on the most vulnerable and marginalised ones. Analysis should also integrate an intersectional perspective, exploring the links between gender and other identity factors that are most contextually relevant; for example, proximity to formal power structures, age, clan, race, and socio-economic background. Integrating participatory and intersectional gendered conflict analysis into programme design in this way, beyond building relationships of trust, can inform and strengthen the effectiveness of UK Government policies, programmes, and actions in FCAS.

GAPS welcomes the introduction of the CSSF fund for LGBT+-inclusive approaches to conflict and the WPS agenda, which funds gender-transformative, inclusive, and equitable peacebuilding projects that also consider sexual orientation and gender identity minorities. We specifically welcome and support the objective in this CSSF fund to recognise and challenge how gender norms, and ideas of masculinity, femininity, and sexuality feed into political power systems. It is positive to see a focus on intersectionality, and an intention to address the discrimination and prevailing power relations that contribute to conflict and insecurity.

Gender norms, including notions of masculinities and femininities, are central in shaping the political, economic, and psychosocial dynamics that drive conflict systems. Targeting these gendered root causes of conflict and violence should be a priority for all UK Government programmes, policies, and actions in FCAS. This should be explicit within the NAP. This focus will strengthen conflict prevention and improve the sustainability of peacebuilding interventions. Targeting gendered root causes means tackling the discriminatory social norms and inequalities that cause gender-based violence and inhibit the meaningful and effective participation of women and other marginalised groups in peace processes.

GAPS remains concerned that the NAP has elevated preventing/countering violent extremism (P/CVE) to a strategic objective rather than as a sub-objective in the prevention of conflict. The focus on this broader, often politicised area risks instrumentalising women's rights networks and organisations to prevent and counter 'violent extremism'.³⁷ This places women's groups and networks at increased risk, as well as diverting limited resources from the WPS agenda. While it is necessary to understand and analyse the root causes and gendered drivers of 'violent extremism', including through a gendered conflict analysis, the NAP should remain focused on how the

³⁷ GAPS, [Prioritise Peace: challenging approaches to Preventing and Countering Violent Extremism from a Women, Peace and Security perspective](#)

UK Government will integrate a gender perspective into the prevention of violent conflict and the building of peace as its ultimate objective.

Recommendations

The UK Government should:

- **Address the gendered social norms that drive conflict, violence and exclusion** as a key principle in effective and equitable programming, policy and action in FCAS.
- **Integrate participatory and intersectional gendered conflict analysis** into any programming, policy and action in FCAS as a priority step to address the gendered drivers of conflict. This analysis should be recognised as a peacebuilding intervention in and of itself.
- **Implement regular training in gendered conflict analysis** for any staff operating in FCAS, including gender and conflict advisers, thematic experts and teams at regional desks and posts, country offices and missions abroad. Following training, **offer sustained accompaniment support** to ensure it is meaningfully integrated into policy and programming design, implementation and monitoring, evaluation, and learning, drawing on staff expertise at regional desks as well as gender experts and with women’s civil society organisations in the specific context.
- **Adopt a policy coherence approach**, which means reducing military expenditure, and increasing investment in local peacebuilding and inclusive approaches to peace and human security.

8. Women’s rights organisations and women’s human rights defenders

Women rights organisations (WROs), Girls’ Rights Organisations (GROs), women human rights defenders (WHRDs), peacebuilders, and activists working towards gender equality and the needs and concerns of women and girls have faced increasing levels of repression and shrinking space for civil society over the past couple of years, further exacerbated by the COVID-19 pandemic, ongoing political crises and emergencies, as well as cuts to funding. This is no more evident than in Afghanistan, where WHRDs are living under a ‘climate of fear’ as reported by the UN OHCHR.³⁸

WROs, WHRDs, and activists require better protection and support in order to strengthen the lifesaving work they do on the frontline for women and girls and within their communities. There is little to no financial support to assist and strengthen WHRDs– this is a problem for the development of the sector and for women's rights

³⁸ UN OHCHR, [Afghanistan: Human rights defenders living under “climate of fear” – UN expert](#)

advocacy. A properly funded and supported civil society sector would be able to strengthen women's rights and human rights awareness.

GAPS welcomed the publication of the UK's guidelines in support of human rights defenders published in September 2019, which acknowledged the specific risks to WHRDs and built on the NAP's recognition that 'civil society remains key partners' for the UK. GAPS also welcomed the UK's guidance on the Women Peacebuilders Protection Framework in 2020,³⁹ and the commitment in the UK's Integrated Review of foreign, development, and defence policy to work with human rights defenders and civil society as a priority action of the 'force for good agenda'. However, without a comprehensive, adequately funded, gendered strategy setting out concrete actions to both resist the global trend towards repression and reprisals, and to increase support and protection to HRDs in-country, neither the Integrated Review commitment nor guidance documents will be meaningful or have any impact.

To meet its commitments to WROs and WHRDs, the UK Government should develop a specific strategy to improve support and protection for HRDs and civil society space, recognising HRDs and CSOs as genuine partners. The strategy should address the crosscutting issues WROs, GROs and WHRDs (and HRDs more broadly) are facing. The strategy should be based on and informed by meaningful consultations with WROs and CSOs working with HRDs and peacebuilders to identify the different needs of women activists, and should include tangible action that actively shares power with WROs, GROs, movements, and WHRDs, as well as ensuring funding to support and protect WHRDs.

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 WROs and organisations led by women and girls in FCAS.

Recommendations

The UK Government should:

- Lead by example and **champion language on the protection of WHRDs domestically and internationally**, and make 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.

³⁹ ICAN, [Protecting Women Peacebuilders: The Front Lines of Sustainable Peace](#)

- **Invest in recognising the unique risks faced by peacebuilders, in particular women and youth.** As such, all peacebuilding program budgets should include a contingency line to respond to emerging security threats and should allow the recipient flexibility on how the funds are used.

9. The Domestic Component

GAPS welcomes references to some limited elements of the WPS agenda domestically in the Government's annual report. It would be important and welcome to strengthen this component, as a cross-governmental approach to WPS offers the strongest opportunity to ensure coherence of foreign and overseas aid policy 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 Committee on the Elimination of Discrimination against Women's (CEDAW's) Concluding Observations. This is particularly important in the context of recovery and rebuilding from COVID-19, as the crisis has had 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 increased their exposure to destitution, violence and exploitation, the effects of which continue to be felt. 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.

More recently, the CEDAW Committee's response to the recent UK interim report emphasises the importance of undertaking a thorough impact assessment of the UK Government's withdrawal from the EU on the rights of women and putting measures in place to mitigate any negative effects, ensuring the rights of women and girls in the UK are protected and strengthened in this new context.⁴⁰ Such an approach would also create pathways to justice protection and adequate support for refugee, migrant, asylum-seeking, and trafficked women and girls who are outside the scope of the current UK NAP. The UK Government has, for many years, prided itself on a foreign policy approach that safeguards the most vulnerable people; however, the Nationality and Borders Act 2022 is a threat to women and girls seeking asylum from persecution. Clauses 31 and 32 of the Bill place a higher threshold for women and girls to reach to be afforded protection in the UK. The Act also criminalises women and girls reaching the UK through irregular routes, thus subjecting them to further control and exploitation from traffickers and putting women and girls with heritage (or assumed heritage) outside of the UK (particularly from non-European countries) at risk of losing their citizenship for reasons beyond their control.⁴¹ It is vital that the UK repeals the Act, and respects CEDAW's statement in 2015 that urges states to respect the rights of women and girls throughout the whole asylum process, and to apply a gender-sensitive approach in the implementation of national legislation on asylum.⁴² Any approach to asylum must take account of learning from work in NAP and

⁴⁰ UN OHCHR, [CEDAW Follow up Letter 2021](#)

⁴¹ UN OHCHR, [Nationality and Border Bill – we urge the UK to take the right decision](#)

⁴² WUNRN, [Statement of the Committee on the Elimination of Discrimination against Women \(CEDAW\) on the Refugee Crises and the Protection of Women and Girls](#)

overseas aid priority countries in the development of responses to women and girls arriving in the UK from these countries, including Afghanistan. This will contribute to creating an effective and comprehensive NAP that can position the UK strongly among donor countries that include a domestic element in their NAP (including Ireland, Canada, the Netherlands, Sweden, Norway, and Germany).

GAPS notes the appointment of Deputy Chief Constable Maggie Blyth as the new National Police Lead for Violence Against Women and Girls in England and Wales. We hope that the new police strategy that she will be agreeing and delivering – which focuses on interventions to prevent violence, target perpetrators, and help victims achieve justice – addresses the root causes of violence against women and girls (VAWG). We also hope that within this strategy, the UK Government considers ratifying the Istanbul Convention and providing specific legal protections for migrant women needing protection from abuse. Recent high-profile cases including: the murder of Sarah Everard by a police officer; the release of Operation Hotton’s report that found evidence of discrimination, misogyny, harassment, and bullying at Charing Cross Police Station;⁴³ and the strip search of Child Q, are all key pieces of evidence to justify that any strategy developed to target the root causes of VAWG must also address violence and misogyny within policing institutions.

Finally, it is important to respond to the views and demands of CSOs in Northern Ireland who believe domestic application of UNSCR1325 would strengthen implementation of gender-specific policies. While Northern Ireland currently has a ‘shadow’ infrastructure that addresses WPS through mechanisms such as the All-Party Group on Women, Peace and Security in the Northern Ireland Assembly, formal recognition and implementation of UNSCR1325 through the UK NAP is a necessary step to understanding and tackling WPS challenges. There is currently limited evidence of progress in strengthening women’s participation in peacebuilding. The past year has been marked by uncertainty and community-level tension and, while women have been at the forefront of calming tensions at community level, this has not been reflected in public dialogue. There is an urgent need to ensure women can meaningfully engage in policy and decision-making processes, and to make gender equality a greater priority in decision making. Women’s civil society continues to call for strengthened engagement, across policy areas including budget planning, ensuring women and girls are protected from violence, and developing new post-Brexit immigration and asylum arrangements. These issues are also highlighted in the CEDAW Committee’s follow up to the UK interim report. If the UK is to comprehensively meet its WPS commitments, it is essential that these issues are addressed at both central UK government level and within the devolved administrations. The UK Government must strengthen its collaboration with domestic departments, as other donor countries do (including Ireland, the Netherlands, Canada, Norway, Sweden, and Germany) to ensure that the NAP is coherent and complements domestic strategies tackling gender inequality, peace, and security.

The UK is recognised as a leader in the WPS field internationally and expanding the NAP to include collaboration with domestic departments and (where relevant) devolved administrations enables knowledge sharing and creates conditions where women and girls in the UK can enjoy the same rights and support that the UK advocates internationally.

⁴³ Independent Office for Police Conduct, [Operation Hotton](#)

Recommendations

The UK Government should:

- **Ensure the preparation of the next NAP is aligned with CEDAW**, taking account of the 2019 Concluding Observations and recommendations from the CEDAW Committee on the 2021 interim report. This should focus on ensuring the rights of all women and girls in the UK, including women and girls who are asylum-seekers, refugees and those with insecure immigration status, in the context of arrangements following the UK's withdrawal from the EU.
- **Ensure the next NAP involves a 'whole of government' approach, with the involvement of domestic UK departments** who have an important role in the WPS agenda, and in the preparation and eventual implementation of the NAP. 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).
- **Repeal the Nationality and Borders Act and conduct Equality Impact Assessments** before introducing any future legislation on migration and asylum to ensure that a gender-sensitive approach is taken that supports and protects refugee, migrant, asylum-seeking, and trafficked women and girls.

10. Humanitarian Relief and Response

The triple threat of COVID-19, conflict, and the climate crisis continues to intensify humanitarian crises around the world. The number of people globally in need of humanitarian assistance tripled between 2015 and 2021, rising to 235.4 million - up by 40% on the number of people in need in 2020.⁴⁴ Women and girls continue to be hit the hardest. They often face particular barriers to accessing humanitarian assistance, legal and safe work, and education. Risk mitigation measures to prevent the spread of the virus, including lockdowns and restrictions of movement, made specific and serious disruptions in women and girls' lives, with the significant diversion of funds and political attention diverting away from women's crucial and lifesaving health, sexual, and reproductive health services, all while the secondary economic impacts of COVID-19 disproportionately impact women-dominated sectors, including hospitality.

These are neglected long-standing crises – they are political emergencies as much as they are humanitarian emergencies, and they require political solutions driven by local and national civil society. The Georgetown Institute for Women and Peace WPS Index⁴⁵ shows a strong correlation between protracted humanitarian crises and gender inequality (across a range of protection and empowerment indicators). It is vital that the UK resources

⁴⁴ IRC, [David Miliband's speech at the AidEx 10th Anniversary Conference: Civil Society and the Age of Impunity](#)

⁴⁵ Georgetown Institute for Women, Peace and Security, [Women Peace and Security Index 2021/2022](#)

a nexus approach to strengthening gender equality in humanitarian crises, through feminist approaches that apply an intersectional gender lens to data, resource allocations, implementation, and evaluation.

Crucially, this means increasing access to funding for locally led humanitarian responses and championing the leadership and inclusion of local women-led and women's rights organisations in humanitarian crises. COVID-19 presented many opportunities to increase direct funding and power sharing with WROs. Although WROs took on additional implementation responsibilities during COVID-19, and despite evidence highlighting that they continue to be best placed to lead and respond rapidly, the UK and multilateral agencies have continued to rely on their standard, top-down ways of funding. WROs are insufficiently consulted in designing humanitarian interventions and receive small pockets of project-based funding that cannot sustain their organisations or essential interventions that protect women and girls in their communities. Flexible funding that reaches WROs directly is a first step to decolonise aid and truly shift power for a more accountable and transformative humanitarian system.

While this demonstrates that the barriers to greater equality and power sharing in the humanitarian system remain entrenched, the UK is well positioned, as a major donor and a key voice in multilateral aid reform processes (through mechanisms such as the Grand Bargain⁴⁶ and Generation Equality Forum⁴⁷) to drive forward changes to how multilateral humanitarian funding is allocated and who receives it. The UK must also continue to use its bilateral funding to directly support nexus approaches to women's leadership in crisis contexts, by prioritising gender equality as a prime objective of interventions.

The UK has signalled its continued support for the WPS agenda in humanitarian crises across 2021, both through their presidency of the G7 and COP26, and through a suite of commitments under the Grand Bargain workstreams on quality funding and localisation, and the Generation Equality Forum's WPS-Humanitarian Action Compact (WPS-HA Compact). However, these commitments have been seriously undermined by the UK ODA cuts, which have disproportionately impacted protection programmes, which are an essential part of a WPS enabling environment (see GAPS 10 Steps) and have constrained progress to the UK's commitments more generally.

It is vital that the UK Government uses the UK WPS NAP to reinforce and strengthen commitments to gender equality in crisis contexts across other humanitarian and political frameworks. For example, ensuring the funding for famine prevention (G7) and climate adaptation (COP26) supports feminist approaches to food security and climate resilience that empower women farmers and climate activists. The UK has a role to play in realising the ambition of the Generation Equality Forum's WPS-HA Compact, by bringing these agendas together ahead of the UK NAP development.

⁴⁶ Humanitarian Policy Group, [The Grand Bargain at five years, an independent review](#)

⁴⁷ [Generation Equality Forum](#)

Recommendations

The UK Government should:

- **Prioritise women’s protection and empowerment** in humanitarian crises by ensuring all UK aid to crisis contexts has **gender equality as either a prime objective** or secondary objective.
- Take an **intersectional approach** to gender equality in crises through the increased use of **data disaggregated** by (for example) gender, age, race, sexuality, disability, displacement status, and economic status.
- **Support feminist leadership** in humanitarian crises through **scaling up direct funding to WROs**, and their greater inclusion in humanitarian planning, implementation, monitoring, and evaluation, in line with the WPS-HA Compact launched at the Generation Equality Forum and the Grand Bargain.
- **Increase transparency and track the proportion of UK Government Funds reaching WROs**, by publishing spend on ‘quality funding’ (multi-year and flexible) with 25% going to local organisations.
 - This requires an audit of UK ODA cuts, a plan for their reversal, and a response to the leaked equalities assessment report with a return to 0.7% of GNI for ODA, including humanitarian funding.
- **Ensure partnerships** to build gender equality and promote SDG 5 in protracted humanitarian contexts are **long-term and flexible to facilitate nexus approaches** across the humanitarian, development, and peacebuilding activities.

11. Gender-based violence and violence against women and girls

The year 2021 can be characterised as one of contradictions regarding the UK’s commitment to addressing gender-based violence (GBV). On the one hand, as co-chair of the GBV Action Coalition at the Generation Equality Forum, the UK – with support from civil society – secured a strong conflict and crisis lens within the resulting Global Acceleration Plan and became a signatory to the WPS-HA Compact. The UK also continued its leadership in the Call to Action on the Prevention of GBV in Emergencies. Ending violence against women and girls was a key priority for the UK Government as it hosted the G7. While it recognised the devastating and disproportionate impact of COVID-19 on women and girls, which risked reversing hard-won gains on GBV, this was an almost entirely non-funded G7 Leaders communiqué⁴⁸ that fell far short of what is required to build back more justly and equally

⁴⁸G7, [Our Shared Agenda for Global Action to Build Back Better](#)

following the COVID-19 pandemic. The Government has, however, made progress towards G7 commitments to scale up implementation of evidence-based prevention and support programmes with the launch of the second phase of the multi-year 'What Works Programme to Prevent Violence Against Women and Girls'.⁴⁹ It is important to recognise the commitment of this programme to work with women-led organisations, address the intersection of violence against children and VAWG, and design programmes that are accessible to adolescent girls and young women, who can fall through the cracks. To maximise the impact of this flagship programme, the UK must use the evidence and learning from this project to inform their approach to GBV prevention and response within the NAP.

On the other hand, crippling aid cuts have taken a devastating toll on women and girls, including survivors of GBV and those at risk of experiencing GBV. The UK's leadership is needed more than ever, given that these aid cuts take place against a backdrop of global under-funding to tackle GBV. Funding to address GBV represented only 1.1% of the total funded global humanitarian overview from 2021,⁵⁰ despite evidence that the risk of GBV had risen during the pandemic and service provision during COVID-19 remained strained.⁵¹

The impact of the aid cuts to gender equality was known to the government through the FCDO's Equalities Impact Assessment. This is particularly concerning given the Integrated Review includes limited-to-no reference to WPS, ODA or GBV.

In November 2021, the Foreign Secretary launched a new campaign to tackle sexual violence against women and girls in conflict⁵², which included: £20 million of new funding mostly to multilateral organisations; confirmation of plans that the postponed 2019 global summit will take place in 2022; and the potential for a global convention to end sexual violence in conflict to be explored. The announcement of new funding is welcomed by GAPS; however, most of this was directed to UN bodies and international funds. GAPS continues to recommend that all funding, including allocations under the PSVI initiative, is long-term, flexible, and accessible to local and regional WROs and peacebuilders. While this is an increase in overall funds allocated for PSVI-related activity, from a total of £2.6 million in 2020/21,⁵³ the pattern following the previous summit year showed a marked reduction over time of dedicated budget for the PSVI. This is not conducive to long-term, sustainable change to end sexual violence in conflict. The upcoming summit, convention, and any other activities under the PSVI must be survivor-centred at their core.

With the development of the upcoming UK NAP, Strategic Conflict Framework, and International Development Strategy, there is an opportunity to make increasingly ambitious and transformative commitments to end GBV globally. It is critical that these mechanisms focus on the prevention of GBV and the provision of increased, quality, flexible funding that is accessible to autonomous women- and girl-led and women's rights organisations working to end GBV. These organisations currently face several barriers to accessing sustainable sources of funding and are side-lined in the humanitarian systems, despite being the frontline responders who understand the pertinent

⁴⁹ UK Government, [What Works in preventing violence against women and girls: review of the evidence from the programme](#)

⁵⁰ UN OCHA, [Financial Tracking Services: Protection – Gender-Based Violence](#)

⁵¹ IRC, [Why Not Local? Gender-based violence, women's rights organisations, and the missed opportunity of COVID-19](#)

⁵² UK Government, [Foreign Secretary launches campaign to tackle sexual violence in conflict around the world](#)

⁵³ House of Commons, [The UK's Preventing Sexual Violence in Conflict Initiative and the G7](#)

needs of women and girls.⁵⁴ The UK must support increased funding to women's rights and women-led organisations in line with Grand Bargain commitments and the principles enshrined in the Generation Equality Forum Gender-Based Violence Action Coalition.

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 (CEDAW).
- **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 and root causes, 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.
- Continue to work with governments and other donors who are partners to the Call to Action on Prevention from Gender-Based Violence in Emergencies 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. Follow through with commitments made at the Generation Equality Forum under the GBV Action Coalition and as signatory to the WPS-Humanitarian Action Compact.
- **Create and strengthen accountability** to women and girls living and working in humanitarian emergencies, including to counter sexual harassment, exploitation, and abuse to end impunity for perpetrators of violence. **Institutionalise safe, confidential, and inclusive opportunities** for women and girls to report violence, including sexual exploitation and abuse and receive sensitive and trauma-informed support. Reporting mechanisms, safe spaces, case management and psychosocial support services should also be accessible to all girls, including adolescents.

12. Effectiveness, Coordination and Process

GAPS is encouraged by its ongoing collaborative working relationship with officials across the UK Government working on furthering the WPS agenda. Engagement with the cross-Whitehall Working Group on WPS offers GAPS

⁵⁴ IRC, [Why Not Local? Gender-based violence, women's rights organisations, and the missed opportunity of COVID-19](#)

an opportunity to share policy recommendations and monitor progress on the delivery of the NAP. GAPS has been able to input into agenda setting and we welcome the open engagement at these quarterly meetings. This is a crucial accountability mechanism that allows GAPS to follow up on commitments and hear updates on government priorities.

However, the high-level WPS Steering Committee chaired by Lord Ahmad of Wimbledon has remained dormant since 2019 despite the important role it could play in delivering on the NAP and associated strategies and policies. There have been no meetings of this structure this year, reflecting a wider lack of ministerial engagement in the WPS Agenda in 2021. With the new NAP in development and the PSVI global summit to be hosted in 2022, GAPS urges the UK Government to accept the renewed opportunity to use these internal structures to build on existing learning from previous years, including the Independent Commission for Aid Impact (ICAI) review on the PSVI.

To deliver on Strategic Outcome 7 of the UK NAP on WPS,⁵⁵ the development and publication of all the Guidance Notes is necessary. In 2021, three Guidance Notes were published, in addition to the previously available one. While this was welcomed, and is a testament to the hard work and cross-government efforts of staff, it also means that only four out of six Guidance Notes have been published since the start of the NAP⁵⁶. The Guidance Notes on *Decision Making* and *Security and Justice* are unpublished as of the release of this report. As we come towards the end of this NAP period, GAPS is disappointed with the Government's unhurried approach to releasing these crucial supporting documents. GAPS strongly recommends that lessons are learned before moving onto the new NAP, and the Government must ensure that the next NAP includes budgeted plans to deliver any required Guidance Notes.

Further to this, country-specific gender strategies remain unavailable for all NAP focus countries. Without these publicly accessible documents, the UK Government cannot meaningfully integrate WPS into all their international work. The Government must develop and publish all the gender strategies before the publication of the new NAP. This process must involve consultation with grassroots and local women's organisations from those countries, using the Beyond Consultation toolkit⁵⁷ in their approach. These supporting documents must be shared in the public domain to ensure transparency and to share knowledge and learning with implementers, civil society, and other governments.

A major missed opportunity this year was the Integrated Review,⁵⁸ which barely mentioned gender or women and had one cursory mention of the WPS agenda. This does not align with the ambition articulated by the Foreign Secretary in the same year to end sexual violence against women and girls in conflict around the world.⁵⁹ WPS must be a priority throughout the UK's work internationally and at home, and GAPS encourages the improved sharing and coordination of NAP supporting documents between government departments.

⁵⁵ UK Government, [UK National Action Plan on Women, Peace and Security 2018-2022](#)

⁵⁶ UK Government, [Implementing the UK National Action Plan on Women, Peace and Security 2018-2022: Guidance Notes](#)

⁵⁷ GAPS, [Beyond Consultations: A tool for meaningfully engaging with women in fragile and conflict-affected states](#)

⁵⁸ UK Government, [Global Britain in a Competitive Age: The Integrated Review of Security, Defence, Development and Foreign Policy](#)

⁵⁹ UK Government, [Foreign Secretary launches campaign to tackle sexual violence in conflict around the world](#)

Integration of the WPS agenda into the Government's broader conflict and security work must be strengthened. GAPS has commended the gender, conflict and stability training which had been delivered to staff working in or on FCAS before the COVID-19 pandemic. GAPS notes that this was not delivered online during periods of pandemic restrictions, and it has not yet restarted. This training is highly valuable and must be delivered and expanded to all staff working on FCAS.

In previous years, GAPS provided feedback on the Ministry of Defence's (MoD) Joint Services Publication (JSP) 1325⁶⁰ and this year GAPS accepted the MoD's invitation to provide feedback on draft JSP 985⁶¹ which supersedes JSP 1325. GAPS is disappointed that the new JSP 985 has a reduced focus on the WPS agenda and centres most WPS priorities on conflict-related sexual violence, which is only one part of WPS. By not considering all four pillars of the WPS agenda, this JSP falls short of the previous iteration. Furthermore, the text does not take an intersectional approach to the impacts of conflict, violence, and P/CVE measures on women and other marginalised groups.

This year the Foreign Secretary, posited the Government's ambitions to create a new international convention on preventing sexual violence in conflict⁶², citing the need to 'build a new consensus to prevent these atrocities.'⁶³ GAPS notes that the UK Government has not yet ratified the Istanbul Convention on Preventing and Combating Violence Against Women and Domestic Violence. The UK must ratify and implement existing international conventions on WPS and conflict-related sexual violence before developing any new conventions. GAPS welcomes the UK's work to implement UN Security Council Resolution 1325 on WPS through the NAP, but this must not be deprioritised, and recommendations from GAPS and civil society must be implemented. As a signatory of the WPS-HA Compact, the FCDO must be more proactive in bringing WPS into all aspects of the UK Government's work.

Recommendations

The UK Government should:

- **Develop and publish the remaining Guidance Notes and country-specific gender strategies**, ensuring that the local and grassroots WROs are **meaningfully consulted** and that all documents are publicly available.
- **Restart Gender, Conflict and Stability training as soon as possible** and ensure that gender is included in all training provided to government officials working in, or on, FCAS.
- **Integrate WPS into all of the UK Government's work** on security, defence, development, and foreign policy, including strategy documents and official job descriptions of staff, to ensure policy coherence.

⁶⁰ UK Government, [Human security in military operations](#)

⁶¹ UK Government, [Human security in Defence \(JSP 985\)](#)

⁶² UK Government, [Foreign Secretary launches campaign to tackle sexual violence in conflict around the world](#)

⁶³ UK Government, [Preventing sexual violence in conflict: joint statement, November 2021](#)

13. The Arms Trade Treaty

The 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 defence statistics,⁶⁴ the UK remains the second largest global defence exporter in the world based on orders/contracts, although the value fell to £7.9bn in 2020. Despite the fact that the UK paused its sale of arms to Saudi Arabia from June 2019 to July 2020, the UK has licensed an estimated £20bn+ of arms exports to Saudi Arabia since the beginning of the war in Yemen in 2015, a conflict the UN has called the 'world's worst humanitarian disaster'.^{65 66 67} The UK's weapons contribution to the war in Yemen has led to an inevitable increase in hostilities and VAWG. Several credible sources have accused the Saudi-led coalition in Yemen of committing repeated serious violations of international law, many of which amount to war crimes.⁶⁸ A 2020 report from the UN Group of Eminent Experts on Yemen highlights its concern that third states who continue to transfer arms to parties within the conflict, despite the clear disregard for international law, may be violating their obligations under the ATT.⁶⁹ In 2019 the Court of Appeal ruled that the sale of arms to Saudi Arabia was unlawful. As a consequence, the UK stopped issuing new licences for approximately one year. However, actual arms transfers continued during this period under extant licences, and following a review in mid-2020 the UK began issuing new licences again. In 2021 the UK issued standard licences for arms exports to Saudi Arabia to a value of £232.9 million, along with an additional 16 open licences which place no maximum value of the amount of equipment that can be exported. The UK Government is currently facing further judicial action on whether arms sales are legal.⁷⁰

The COVID-19 global crisis has demonstrated that building healthy, safe, and resilient societies is more important than ever. Decades of evidence demonstrates a clear link between arms trade and gender-based violence. The proliferation of arms contributes to a culture of violence against women, both during and after armed conflicts. It is also correlated with an increase in gender inequality and hinders women's economic empowerment and access to political agency.^{71 72} The 2021 Integrated Review references the Government's ongoing commitment to gender equality, peace and security,⁷³ However, its arms trade practices have undermined such aims.

⁶⁴ UK Government, [UK defence and security export statistics: 2020](#)

⁶⁵ Campaign Against the Arms Trade, [UK Arms to Saudi Arabia](#)

⁶⁶ Campaign Against the Arms Trade, [True value of UK arms trade to Saudi Arabia worth over £20 billion since 2015](#)

⁶⁷ CNN, [The Yemen war is the world's worst humanitarian crisis, UN says](#)

⁶⁸ Human Rights Watch, [Yemen: Events of 2019](#)

⁶⁹ UN OHCHR, [Report of the Group of Eminent International and Regional Experts on Yemen](#)

⁷⁰ UK Government, [Strategic Export Controls, Licensing Statistics 2021](#)

⁷¹ WILPF, [Gender-Based Violence and the Arms Trade](#)

⁷² WILPF, [Challenge the Arms Trade and Armed Violence](#)

⁷³ UK Government, [Global Britain in a Competitive Age: The Integrated Review of Security, Defence, Development and Foreign Policy](#)

Particularly as the UK begins to reflect on the successes and shortcomings of the current NAP and plan for its next iteration, a more robust commitment to fully abiding by the Arms Trade Treaty is crucial in realising the WPS agenda.

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. **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 licence refusal** or was included as a cautionary factor in a licensing decision.
- **Maintain a close relationship with EU Member States** regarding operating within the same framework when making export licensing decisions; elaborating a more detailed approach to assessing risks that arms exports 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.
- Work with the US to **re-sign and ratify the Arms Trade Treaty** as it undergoes the review of its conventional arms transfer policy.



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