

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



gender action for peace and security

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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 and the newly published fifth NAP on WPS moving forward. 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

2022 was a busy year for the Women, Peace and Security (WPS) agenda in the UK as the UK's fourth National Action Plan (NAP) wrapped up and the fifth NAP was drafted. This all occurred on a backdrop of the Preventing Sexual Violence in Conflict Initiative (PSVI) conference, significant cuts to the UK's Official Development Assistance (ODA), the Russian invasion of Ukraine and multiple changes in Prime Minister. In such a momentous and turbulent year, it was all the more important that the WPS agenda was implemented in all international policy but again this did not materialise in the lives of women and girls.

The new cuts to the ODA budget announced in 2022 ran contrary to the promises from the Foreign Secretary in 2021 that funding for women and girls would be restored to levels prior to the 2021 cuts, and no efforts were made to realise this. The UK must restore this funding as promised, to attempt to reverse the devastating impact that this decision had on millions of women. While GAPS was pleased to see the launch of new Gender Equality and Social Inclusion (GESI) markers within the Conflict, Stability and Security Fund (CSSF) and the creation of a WPS Helpdesk, we continue to call for a dedicated WPS fund, which will support the implementation of the 2023-2027 NAP, and fulfill the recommendation that 15% of peacebuilding funds targets gender inequality. GAPS echoes the Independent Commission for Aid Impact (ICAI) review of peacebuilding efforts that long-term and reliable funding is necessary to improve the UK's work on peacebuilding.

The PSVI Conference also took place in 2022 and GAPS noted clear efforts to consult and involve survivors in the planning process and commended some of the final objectives of the conference for including root causes and prevention of conflict-related sexual violence (CRSV). However, GAPS raised concerns that the government's focus on sexual violence in conflict risked siloing of gender-based violence issues within the WPS agenda and a lack of holistic policy that is necessary for the initiative to be a success. Furthermore, the PSVI shines a light on the stark contradictions between the UK's intended foreign policy and domestic policy. For some time, GAPS has highlighted the paradox between efforts to support survivors of CRSV globally while denying the rights of survivors of CRSV seeking refuge in the UK.

2022 has seen a worsening in the UK's domestic policies related to the WPS agenda: with the introduction of Nationality and Border Act creating a two-tier asylum system, the announcement of the Rwanda deportation policy which will affect asylum seekers forced to enter the country through irregular routes, and the continued detention of women and girls who seek asylum in the UK. GAPS continues to call for an immediate stop to these racist and dehumanising policies. The significance of the UK's refugee policy was under scrutiny after the invasion of Ukraine. GAPS praises the response from the government to Ukrainian refugees and calls for more support to women human rights defenders who remain in the country. However, we are disappointed to see that refugees from other conflict-affected countries, including Afghanistan, do not see this level of support; women who were able to flee the country in 2021 remain in temporary accommodation and have not yet received support. GAPS strongly calls for the UK to honour their promises to these women and support the women human rights defenders, activists and humanitarian responders who helped the government advance the WPS agenda in Afghanistan.

The UK Parliament also considered WPS in 2022, with Baroness Hodgson's Private Members' Bill on WPS moving through the House of Lords, with the next stages due in 2023. As we enter into the first year of the new NAP, the UK government has a tremendous opportunity to make real progress on their WPS commitments by passing this bill and by taking on board the reflections and recommendations made by GAPS in this report.

## 2. Response to the UK 2022 UK Government Annual Report

GAPS welcomes the UK Government's 2022 Annual Report on its progress on implementing the 2018–2022 NAP on WPS. This year's annual review is of particular importance as it closes out the fourth National Action Plan of the UK and sets the stage for the implementation of the NAP for 2023-2027. 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 to assess progress, challenges and areas where commitment and implementation are still needed.

GAPS was surprised to see a departure from the previous formatting of the reports. The consistency in formatting permitted civil society actors such as GAPS as well as other stakeholders to monitor and assess government's progress annually. In particular, it was disappointing to note the absence of a ministerial foreword and the section on domestic application of the UK National Action Plan. Unlike previous reports, there were also no dedicated sections on each of the nine focus countries outlined in the National Action Plan, whereas there is an inclusion of case studies that were not focus countries. We appreciate the discussion on the advantages and disadvantages of selecting focus countries, but the absence of dedicated sections makes it harder to assess UK progress in specific geographies. We do welcome the positive developments that have come with this change of formatting, most notably the inclusion of a recommendations on resourcing and monitoring, evaluation and learning under.

GAPS welcomes the dedicated section of recommendations that focuses on monitoring, evaluation and learning. These are concrete suggestions that will respond to the many calls included in the review from embassy staff, civil society, affected communities and other stakeholders to be better able to understand the impact of the NAP. In particular, we welcome the urgency and resourcing in the recommendations on establishing MEL processes. We note the recommendation to make the creation of MEL consultative across departments and encourage the inclusion of other stakeholders, in particular those most affected by WPS programming, in these processes, such as women's rights organisations and women's rights defenders. The creation of MEL processes would benefit from a Theory of Change that links the commitments made in the WPS agenda to the UK's Strategic Outcomes, activities and indicators. GAPS looks forward to continuing to work with the UK Government on this.

GAPS agrees with the recommendation to earmark funding for WPS implementation and welcome the calls for more dedicated funding to local NGOs, support for multilateral offices including the High Commissioner for Human Rights and conducting impact analysis of the ODA budget cuts. Apart from these recommendations, GAPS remains concerned, as we have been in the past two shadow reports, about the lack of details on the impacts of budget cuts on WPS programming in focus countries. This is especially worrying noting the diversion of ODA to domestic spending on asylum seekers and significant cuts in funding from other WPS allies, most notably Sweden. The report does not contain clear numbers or definitions of what funding is currently spend explicitly on implementing the NAP. We welcome the case studies of programming funded through the CSSF, but without clear details on numbers and impact, there is a lack of clarity around the longevity of these programmes as the CSSF is merged into the Integrated Security Fund.

GAPS expresses its thanks for the continued consultative approaches in which the UK seeks to implement its WPS commitments. 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 implements its new NAP, GAPS looks forward to working with the UK Government to implement its WPS commitments.

## 3. Funding

### a. Aid Cuts

In July 2021, the UK Parliament voted to reduce spending on ODA from 0.7% to 0.5% of GNI until the economy meets a series of criteria that the sector has branded as unlikely to be met for several years.<sup>1</sup> In 2022, further pressures were placed on the budget as spending for other purposes – including hosting refugees in the UK – were counted towards ODA spend. Refugee hosting costs also greatly increased following escalating conflicts in Ukraine and Afghanistan.<sup>2</sup> Despite further budget being allocated towards supporting refugees, a further £1.7 billion worth of ODA cuts are expected to be made before March 2023, the third major cut in three years.<sup>3</sup>

Even before these expected cuts, UK ODA cuts have already had a severe and disproportionate impact on women and girls. This was identified by the Government in an Equalities Impact Assessment published in March 2022, which recognised that the 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.<sup>4</sup> Despite this, the UK Government went ahead with its ODA cut plans. Analysis of the £4.6 billion cut to ODA in 2021 estimated it would result in 20 million women and girls not being 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<sup>5</sup>

When the UN Population Fund, to which the UK is the largest donor, reported an 85% reduction in funds from the UK, it estimated 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.<sup>6</sup>

The announcement in November 2021 by then Foreign Secretary Liz Truss that the development budget for women and girls would be restored to pre-cut levels was welcomed by the sector.<sup>7</sup> Yet no further clarity has been provided on when, how and to what baseline year volumes would return. The additional cuts announced in November 2022 further put this promise into question. It has been estimated that a return to pre-2020 levels of funding for gender equality would require an increase of £1.6 billion from FCDO programming and up to £1.9 billion overall from the UK.<sup>8</sup>

The lack of consultations undertaken to determine how the ODA cuts should be carried out, and the lack of efforts to mitigate long-term negative impacts on women and girls, does not align with the government's Strategic Vision for Gender Equality, nor its National Action Plan (NAP) for WPS, which seeks to implement structural

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<sup>1</sup> Devex (2021), [After Parliament vote, 0.7% UK aid target out of reach for years](#)

<sup>2</sup> Devex (2022), [UK aid faces third major cut in 3 years, with £1.7B to be cut](#)

<sup>3</sup> Ibid.

<sup>4</sup> UK Government (2021), [Equalities Impact Assessment](#)

<sup>5</sup> CARE International (2021), [UK Government decisions to cut UK Aid are disproportionately falling on women and girls](#)

<sup>6</sup> UNFPA (2021), [Statement on UK government funding cuts](#)

<sup>7</sup> Liz Truss, inews (2021). Liz Truss: [I want to ensure no country can ever again use sexual violence as a weapon of war](#)

<sup>8</sup> CARE International (2022), [UK Leadership on Gender Equality Globally](#)

changes. There are currently no mechanisms in place to monitor the impact of UK ODA cuts on the WPS sphere, making it harder to assess the true long-term impact on the sector. Funding for women's rights organisations (WROs) was cut by 10% in 2020,<sup>9</sup> and recent data suggests this has not been restored, which 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.

These trends are accompanied by a longer-term decline in UK spending on civilian peacebuilding, conflict prevention and resolution. Analysis of OECD Development Assistance Committee (DAC) figures indicates that from 2016–2019 the UK spent a declining share of the aid budget in this area, culminating in less than 2% of the total ODA budget.<sup>10</sup> 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 and 2022, this funding allocation is especially important. Without prioritisation of WPS funding within the remaining budget, the NAP cannot be meaningfully delivered.

### **b. Funding for Gender Equality and Women, Peace and Security**

As we look back on 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 welcomes the creation of the CSSF's WPS Helpdesk, which is a positive example of using funding to increase WPS knowledge across all government departments. GAPS looks forward to reading CSSF's 2022 Annual Report to see how the pilot programme for the Gender, Peace and Security portfolio has complemented the mainstreaming of WPS in all other portfolios and in-country posts within the FCDO and CSSF, and how it targets specific unmet needs.

GAPS also welcomes the creation of the new CSSF GESI Marker, and its commitment to ensuring that 1) there is at least one dedicated WPS/gender-focused project per programme; 2) all projects mainstream gender; 3) it is used as a MEL tool; and 4) that all programmes conduct a GESI analysis as a minimum standard.<sup>11</sup>

While GAPS welcomes commitments made by the government to restore funding to women and girls through the development of a Women and Girls' Strategy, the release of the strategy and therefore associated funding has been delayed, with no clear guidance on when it will be released. We are also concerned that historically, even when funding is committed to women's rights programming, it is usually granted to large multilateral organisations. For example, in 2021 the Foreign Secretary committed £22.4 million to help stop violence against women and girls globally, but only £3 million of this particular pot went to the UN Trust Fund to End Violence against Women and Girls, which funds small civil society and women-led organisations.

According to OECD DAC figures from 2019–2020, non-governmental WROs and movements received only 0.44% of the total bilateral ODA from OECD DAC countries (USD 162.2 billion);<sup>12</sup> and only 1.25% of gender-

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<sup>9</sup> CARE International (2021), [UK Government decisions to cut UK Aid are disproportionately falling on women and girls](#)

<sup>10</sup> Saferworld (2021), [Submission to the International Development Committee Inquiry: The Philosophy of Aid](#)

<sup>11</sup> Guidance on Gender Equality and Social Inclusion (GESI) (2021), [UK Pact](#)

<sup>12</sup> Workbook OECD, [ODA by Income Group](#)

focused ODA (USD 56.5 billion).<sup>13</sup> In 2020 only 6% of ODA-funded CSSF programmes had gender as a main objective while 65% of programmes had a significant gender component.<sup>14</sup> Similarly, according to analysis of UN OCHA data by Development Initiatives, the proportion of total gender-specific humanitarian assistance provided to local and national actors was reduced from 4.8% in 2018 to 3.1% in 2020.<sup>15</sup> Further, 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, as per its commitments under the Grand Bargain.<sup>16</sup> This type of funding enables WROs and women human rights defenders (WHRDs) 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 bureaucracy of application processes and reporting burdens. 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.<sup>17</sup>

Evidence has shown that this type of funding would support WROs' vital work in providing front-line services in fragile and conflict-affected states (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 by offering long-term and core funding.<sup>18</sup>

While we welcome the financial commitment of £12.5 million over the next three years made as part of the Preventing Sexual Violence Initiative (PSVI) Strategy, we are concerned and disappointed as this does not offset the impact of ODA cuts on broader gender equality and conflict prevention programming that is essential to the prevention of conflict-related sexual violence, SGBV, and gender inequality.<sup>19</sup> We hope to see a substantial majority of this funding committed to supporting WROs and women leaders in FCAS. GAPS was pleased to see funding available for WROs as part of the "Advancing Gender Equality through Support to Women's Rights Organisations and Movements" bid that was released in August 2022.<sup>20</sup> This is a step in the right direction and we hope to see this type of funding available more often in future.

To measure the impact of the UK NAP and WPS commitments, including financial 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 ODA cuts continue to impact programming in focus countries, it is vital that clear monitoring and evaluation tools are available so the overall impact on the 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.

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<sup>13</sup> OECD (2022), [Gender ODA 2022](#)

<sup>14</sup> Conflict, Stability and Security Fund: Gender and Human Rights (2022), [Question for Cabinet Office](#)

<sup>15</sup> Development Initiatives (2022), [Gender-relevant international humanitarian assistance](#)

<sup>16</sup> Agenda for Humanity (2016), [Stakeholder Commitments](#)

<sup>17</sup> GAPS (2020), [The Key to Change Supporting Civil Society and Women's Rights Organisations in FCAS](#)

<sup>18</sup> Ibid.

<sup>19</sup> UNFPA (2021), [Statement on UK government funding cuts](#)

<sup>20</sup> UK Government (2022), [International Development Funding, Advancing gender equality through support to WROs](#)

## Recommendations

The UK Government should:

- **Restore the international ODA 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% 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, easy to access 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** in order 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.

## 4. 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 and to use evidence to inform the next NAP, 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 the 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, 2020, and 2021 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 2022, the lack of an evaluation, in addition to the UK ODA cuts, makes assessing progress and impact of the NAP difficult.

Reiterating its expectations from the 2021 shadow report, GAPS asks that the UK Government put 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).

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 which 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.

## 5. 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 to influence agenda setting. 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.<sup>21</sup>

GAPS welcomes how 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.<sup>22</sup> 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.<sup>23</sup>

GAPS encourages the UK Government to continue building on the evidence, research, and resources 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'<sup>24</sup> and investing in future GAPS member-led consultations such as the 'Now and the Future'<sup>25</sup> project, which looks at the impact of COVID-19 on gender equality, peace, and security throughout 2020–2021. UK Government-funded consultations such as those led by GAPS set an important foundation for laying out how donors and governments should meaningfully consult with WROs and CSOs and inform future funding frameworks and approaches to engagement in decision-making.<sup>26</sup>

GAPS encourages renewed funding for consultation with civil society, particularly WROs, as a priority for ensuring the UK Government meets its commitments to WPS. 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. This 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'.<sup>27</sup> Providing practical tools and guidance will ensure that these learning sessions contribute to strengthening UK Government capacity and gender awareness.<sup>28</sup>

However, overall, GAPS finds it difficult to assess the integration of gender conflict analysis and consultation across the implementation of this NAP, as there have been sustained issues associated with guidance notes, as detailed later in this report. GAPS is therefore concerned that the failure to institutionalise meaningful

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<sup>21</sup> GADN (2021), [Humanitarians and the Women, Peace and Security agenda during Covid-19](#)

<sup>22</sup> GAPS (2019), [Beyond Consultations: A tool for meaningfully engaging with women in fragile and conflict-affected states](#)

<sup>23</sup> UK Government (2018), [National Action Plan on Women, Peace and Security](#)

<sup>24</sup> GAPS (2019), [The 10 Steps: Turning WPS Commitments into Implementation](#)

<sup>25</sup> GAPS (2021), [Now and the Future: Gender Equality, Peace and Security in a COVID-19 World and Beyond](#)

<sup>26</sup> GAPS (2020), [The Key to Change: Supporting Civil Society and Women's Rights Organisations in Fragile and Conflict Affected Contexts](#)

<sup>27</sup> UK Government (2018), [National Action Plan on Women, Peace and Security](#)

<sup>28</sup> Ibid

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.

Whilst there are significant areas of progress for meaningful participation and consultation in the next NAP, GAPS is pleased that for the duration of the current NAP there has been some sustained investment in consultation, participation, and research.<sup>29</sup> 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.<sup>30</sup>
- £250,000 to support GAPS to undertake vital research on the gendered impacts of COVID-19 in FCAS. This funding enabled GAPS to produce the series 'Now and the Future: Gender Equality, Peace and Security in a COVID-19 World and Beyond'.<sup>31</sup> 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.<sup>32</sup>

The above examples set a constructive precedent for 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.<sup>33</sup>

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.<sup>34</sup> 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.

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<sup>29</sup> UK Government (2020), [UK National Action Plan on Women, Peace and Security: Annual Report to Parliament 2020](#)

<sup>30</sup> Ibid

<sup>31</sup> GAPS (2021), [Now and the Future – Pandemics and Crisis: Gender Equality, Peace and Security in a COVID-19 World and Beyond](#)

<sup>32</sup> Ibid

<sup>33</sup> GAPS (2019), [Beyond Consultations: A tool for meaningfully engaging with women in fragile and conflict-affected states](#)

<sup>34</sup> UK Government (2021), [Women's participation is fundamental to sustainable peace: Lord Ahmad's statement](#)

GAPS recognises and values our continued consultative relationship with the UK Government through policy input and reflections for the Preventing Sexual Violence in Conflict Initiative, on the International Development Strategy, the Women and Girls' Strategy, and on the new NAP. For the UK Government's consultative work to move from input to transformation, the UK Government should replicate the consultative relationship it has with GAPS with the civil CSOs/WROs in FCAS.

The UK Government should go beyond consultations, prioritise working on these long-term 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 and long-term funding, and ensuring that programmes respond to the changes they have identified as being necessary.<sup>35</sup> 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.

## 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.
- **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.

<sup>35</sup> GAPS (2020), [Supporting Civil Society and Women's Rights Organisations in Fragile and Conflict-Affected Contexts: Somalia Report](#)

## 6. 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, while advancing gender equality. It is a first and high-priority step in understanding and addressing the gendered root causes of conflict, to help to prevent further conflict and violence and leverage opportunities for sustainable and inclusive peacebuilding. This analysis should also be mandatory within the development and review processes of all country business plans, all Joint Analyses of Conflict and Stability (JACS), and all country and thematic strategies and policies, as well as their implementation plans. Gender-sensitive conflict analysis should take place at the start of any new policy or programming process, independently of its thematic and contextual focus, 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 analysis systematically in UK policy and practice. The analysis is a starting point and needs to be followed up by sustained accompaniment (including gender advisers and staff trained in gender) and adequate budget 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, global health threats, and cybersecurity have a devastating impact on the lives of women and girls, particularly those from minority groups.

Participatory and intersectional gendered conflict analysis should meaningfully include a balance of participants, including national and local government officials and civil society in FCAS, a diversity of women's networks, movements, and organisations, youth, and other constituencies who would otherwise be excluded. 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, disability, sexual orientation and gender identity, and religious and socio-economic background. Furthermore, it should highlight the actors that are already working for peace – other than the usual suspects – including smaller grassroots organisations with a deep understanding of the context and of the needs of those usually excluded. Integrating participatory and intersectional gendered conflict analysis into programme design in this way can inform and strengthen the effectiveness of UK Government policies, programmes, and actions in FCAS, while increasing the participation of and building relationships of trust with people affected by conflict and those working to bring positive change.

Gender norms, including notions of masculinities and femininities, are central in shaping the political, economic, and psychosocial dynamics that drive conflict systems, violence, and structural inequalities. Working to transform these gendered root causes of conflict and violence should be a priority for all UK Government programmes, policies, and actions in FCAS, but also at the national level. Acknowledging the interconnection between these root causes and issues such as development, climate change, global health, and domestic affairs – among others – will support the positive advancement of these and other agendas. This should be explicit within the NAP and pushed to be integrated as a commitment in other strategies. Targeting gendered root causes means tackling the discriminatory social norms and inequalities that cause GBV and inhibit the meaningful and effective participation of women and other marginalised groups in peace and political processes.

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 people with diverse sexual orientations and gender identities. 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.

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'.<sup>36</sup> 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 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:

- **Invest in addressing the gendered social norms that drive conflict, violence, structural inequalities, 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, 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 MEL, drawing on staff expertise at regional desks as well as gender experts and women's CSOs 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, human security, development, and other transnational issues such as climate change, global health, cybersecurity, and migration.

## 7. Women's rights organisations and women's human rights defenders

WROs, girls' rights organisations (GROs), WHRDs, peacebuilders, and activists working for the rights of women and girls and gender equality continue to face high levels of repression and shrinking space for civil society,

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<sup>36</sup> GAPS (2018), [Prioritise Peace: challenging approaches to Preventing and Countering Violent Extremism from a Women, Peace and Security perspective](#)

further exacerbated by the fallout from the COVID-19 pandemic, ongoing political crises and emergencies, as well as cuts to funding.

According to Frontline Defenders at least 358 human rights defenders were killed in 2021<sup>37</sup> and in 2022, CIVICUS Monitor estimated that 8.5% of the world's population lived in countries rated as closed, repressed, or obstructed; with the situation worsening in 13 countries and improving in only one.<sup>38</sup>

The rollback in Afghanistan is perhaps the most shocking. In the year since the Taliban took control of the country the rights of women and girls have been rapidly deteriorating, and their participation in public and political life is nil;<sup>39</sup> women journalists and activists are particularly targeted<sup>40</sup> and in December 2022, women employed by local and international NGOs were banned from going to work.<sup>41</sup>

There continues to be little to no financial support to assist and strengthen WHRDs, which is both a problem right now and will be an issue in the long term as discriminatory norms and GBV continue to be normalised and protection mechanisms taken away. The Special Rapporteur on the situation of human rights in Afghanistan, in his report presented to the Human Rights Council in September 2022, notes that: 'Notwithstanding these discriminatory measures, even in the face of threats, detention and violence, Afghan women continue non-violent protest and resistance; they need support'. It recommends that the international community 'take all measures necessary to support and protect women and girls, especially women's rights defenders [...] including through political support and by providing flexible and accessible funding arrangements to those inside and outside Afghanistan, especially women-led organisations.' This includes ensuring safe passage to those most at risk for their safety and who need to leave the country.<sup>42</sup>

In 2019 GAPS welcomed the publication of the UK's guidelines in support of human rights defenders, guidance on the Women Peacebuilders Protection Framework in 2020,<sup>43</sup> 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'.<sup>44</sup> However, there is still no comprehensive, adequately funded, and gender-responsive strategy to resist the global trend in backlash and to increase support and protection to WHRDs both in country and across diasporas. As a result, the Integrated Review, neither commitment nor guidance documents, will have any meaningful impact.

GAPS welcomes the recent commitment from the FCDO to develop a civic space strategy that will include protection for human rights defenders. This must be realised purposefully, including through the government acting on its commitment to work with human rights defenders and CSOs as genuine partners and therefore ensure any strategy is developed through meaningful and legitimate consultation with CSOs, and particularly with WROs and WHRDs. There is a global pushback against the rights of women and girls. Therefore, the UK should work with like-minded governments from the 'global North and South' and civil society (including international organisations) to devolve the shaping of the WPS agenda to WROs and organisations led by women and girls in FCAS.

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<sup>37</sup> Frontline Defenders (2021), [Global Analysis 2021](#)

<sup>38</sup> CIVICUS (2021), [Monitor In Numbers](#)

<sup>39</sup> OHCHR (2022), [Human rights council discusses situation on the human rights situation in Afghanistan](#)

<sup>40</sup> Amnesty (2022), [Afghanistan Women Human rights defenders arrested by the Taliban must be immediately released](#)

<sup>41</sup> Al Jazeera, [Taliban bans women from working for domestic foreign NGOs](#)

<sup>42</sup> United Nations High Commissioner for Human Rights and reports of the Office of the High Commissioner and the Secretary-General (2022), [Situation of human rights in Afghanistan](#)

<sup>43</sup> ICAN (2020), [Protecting Women Peace builders](#)

<sup>44</sup> UK Government (2021), [Global Britain in a competitive age - The Integrated Review](#)

## Recommendations

The UK Government should:

- **Provide accessible, core, and long-term funding** to WROs and women's movements for their provision of essential services; their vital role in advocacy, transformational change, and movement building; and their role in achieving women and girls' rights. See recommendation 3 in funding.
- **Lead by example and champion language on the protection of WHRDs domestically and internationally**, as well as realising a commitment to implement a funded strategy on protecting and promoting civil society space, including internationally coordinated work that establishes a protection mechanism for human rights defenders.
- **Ensure the safety and protection of WHRDs**, calling for partner governments across the globe to legislate against GBV and for the protection of WHRDs from violence by state and non-state actors. The legislation should be accompanied by adequately funded national strategies and implementation plans developed in partnership with WROs and WHRDs.
- In line with the recommendations in Beyond Consultations, **embed a commitment to meaningful participation and consultation across the UK Government**, requiring officials working in or on FCAS to work in partnership with women's rights movements and organisations and WHRDs, including in the development of any strategies to promote and protect civil society space and WHRDs. The UK Government should also recognise that safe, inclusive, and non-extractive consultation of women and girls in challenging contexts might require greater planning and resources.
- **Ensure safe passage** to all those WHRDs who need to evacuate their countries.

## 8. The Domestic Component

GAPS has welcomed some limited elements of a domestic implementation throughout this NAP, but has also consistently called for a stronger approach to domestic implementation in line with the example of countries such as Canada, Germany, Norway, and Ireland. GAPS recommends integrating a strategic and ambitious set of domestic objectives in the upcoming NAP based on clear, cross-government commitments and accountability measures. It is vital that the new NAP is underpinned by a 'whole of government' approach, as this is central to a meaningful realisation of the WPS agenda.

Policy coherence across foreign and domestic policy creates the strongest basis for the UK to lead by example in this field, while also strengthening opportunities for innovation and learning. Critically, it ensures that women and girls in the UK, including migrant, refugee, and asylum-seeking women, can enjoy the same rights as the UK advocates for women internationally. International bodies including the CEDAW Committee and UN Special Procedures have highlighted the lack of compassionate and effective provision for migrant, refugee, and asylum-seeking women and girls, based on the UK's human rights obligations. A coherent approach to WPS offers a clear, rights-based mechanism for addressing these urgent needs.



GAPS has always pointed to the need for increased policy coherence in order to ensure a strong NAP, including the domestic component. GAPS is therefore concerned that developments over the past year will make it more challenging to achieve this goal. GAPS is particularly concerned about:

- The introduction of a two-tier asylum system, which places a higher burden for women and girls to be granted asylum through the Nationality and Border Act. The criminalisation of refugees reaching the UK through 'irregular' routes is particularly egregious given the lack of safe routes for women and girls to reach the UK. Criminalisation means that women and girls will face a higher risk of GBV and trafficking and will be penalised for the UK's failure to provide safe routes.
- The introduction of the so-called Rwanda scheme<sup>45</sup> targeting those arriving by irregular routes, which – given the lack of safe passage routes – includes WHRDs and/or sexual and gender-based violence (SGBV) survivors.
- The continued detention of survivors of GBV and the restrictions of routes to family reunion for refugee women and girls, as well as the continuation of women and girl survivors of GBV not being taken seriously throughout the asylum system.
- The proposed introduction of the Northern Ireland Troubles (Legacy and Reconciliation) Bill which will close routes to justice for victims, including victims of GBV, by granting immunity for perpetrators.

In Northern Ireland, the situation has deteriorated over the past year with continued uncertainty and tension at all levels, evidenced by no functioning institutions since January 2022 and exacerbated by the cost of living crisis. Gender equality and peacebuilding have been largely side-lined, although positive developments have included a renewed focus on violence against women and girls, including work initiated on the first strategy on violence against women and girls,<sup>46</sup> and an action plan launched by the Police Service of Northern Ireland seeking to address discrimination, harassment, and offending by its own officers, as well as improve services to victims and survivors.<sup>47</sup> An urgent return of the Assembly and Executive, with gender equality and peacebuilding integrated into a Programme for Government, is vital to build confidence in the institutions, and to enable locally informed and relevant action. A new NAP integrating a domestic element would provide a mandate for this, enabling greater priority for gender equality and peacebuilding. However, it is essential that the devolved mechanisms are respected and upheld, as the complexity and contested nature of the issues means sensitivity is required. Therefore, the NAP must navigate this complexity, and can potentially most effectively operate as a mechanism for dialogue between the devolved administrations and central government, as well as between decision makers, the women's sector in Northern Ireland, and grassroots women and girls organisations.

GAPS reiterates the lack of clarity on how the Tackling Violence Against Women and Girls (VAWG) Strategy in the UK is closely linked to the current NAP on WPS, the WPS framework, and other global work. It recommends that this is addressed in the new NAP.

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<sup>45</sup>UK Government (2022), [World first partnership to tackle the global migration crisis](#)

<sup>46</sup> See information on work preparing the strategy on The Executive Office [website](#)

<sup>47</sup> Police Service of Northern Ireland (2022), [Tackling violence against women and girls action plan](#)

## Recommendations

The UK Government should:

- **Integrate a strategic and ambitious domestic element in the new NAP** based on a ‘whole of government’ approach to implementation.
- **Ensure that the domestic component of the new NAP recognises devolution** – ensuring the authority and role of devolved administrations is respected and giving a specific focus to the complexity of the situation in Northern Ireland – and commit to meaningful engagement with WROs in Northern Ireland.
- **Recognise that it is the lack of safe and legal routes that pushes women victims of GBV, including sexual violence, to reach the UK through dangerous journeys** – such as crossing the Channel – and embed that recognition into its analysis to develop the new NAP.
- **Repeal the Nationality and Borders Act**, increase safe routes for women escaping violence, end the detention of women and girl asylum seekers, and expand routes to family reunion.
- **End the UK and Rwanda Migration and Economic Development Partnership.**
- **Strengthen the understanding of GBV**; including sexual violence, across the asylum system based on the recommendation of the CEDAW Committee, in particular General Recommendation 32.<sup>48</sup>
- **Ensure strategic coherence across foreign and domestic policies, including the NAP**, through setting minimum standards applicable across policies and reflecting the international obligations and commitments of the UK, with a particular emphasis on returning overseas ODA expenditure to 0.7% of GDP.

## 9. Humanitarian Relief and Response

An overlap of increased risks in light of new and protracted conflicts, the deepening of climate change and the COVID-19 pandemic continue to magnify the increased drivers of humanitarian needs, amplifying existing and intersecting forms of inequalities and injustices. This is particularly relevant to women and girls, who continue to be disproportionately impacted in these contexts. Globally, 388 million women and girls live in extreme poverty,<sup>49</sup> with the 2023 GHO stating that it will take over 130 years to achieve global gender parity. Yet, in 2021, gender-relevant humanitarian funding still accounted for just 3.4% of total international humanitarian assistance.<sup>50</sup>

<sup>48</sup> CEDAW (2016), [Committee Statement on the refugee crisis](#)

<sup>49</sup> UN Women (2022), [UNDP and the Pardee Centre for International Futures estimations](#)

<sup>50</sup> ODI (2022), [‘Global Humanitarian Assistance Report 2022: Chapter 2: Volumes of Humanitarian and wider crisis financing’](#)

In 2021, the UK designated 2.0% of its total humanitarian assistance for gender-specific programmes. While in terms of total volume it is the fourth-largest donor of humanitarian ODA, the UK was only the eighth-largest donor by volume of gender-specific international humanitarian assistance in 2021. The cuts to the UK's overall ODA budget led to a sharp drop (50%) of gender-specific international assistance in 2020 from 2019 volumes. In 2021, UK gender-specific contributions recovered slightly, growing by 15%.<sup>51</sup> It is essential that within the context of UK ODA being under even greater threat, the UK continues this upward trend, protects, and invests in principled and inclusive humanitarian action, alongside a more proactive response to avert humanitarian crises, including gendered early-warning analysis.

In this endeavour, the UK should continue to prioritise multi-year flexible funding with a focus on women and girls' protection, participation, and leadership. This will facilitate longer-term, nexus approaches across humanitarian, development, and peacebuilding activities. It is critical to take a long-term perspective across all stages of the nexus to promote gender equality and address the underlying and interlinked drivers of conflict, crisis, and gender inequality.

This should be done by working closely with women's rights and women-led organisations, as a means for greater equality and power sharing in the humanitarian system – which often does not recognise the role and work of women leaders, despite evidence highlighting that they continue to be best placed in leading responses and work to operationalise the Triple Nexus.<sup>52</sup> To meaningfully shift power to women-led and women's rights organisations, the UK Government must continue to invest in and promote multilateral aid reform processes such as the Grand Bargain and Generation Equality Forum to drive forward these changes. At this stage, localisation is under-reported in the UK's Grand Bargain self-reports, with limited details on the percentage of partnership or funding agreements that incorporate multi-year, institutional, capacity-strengthening support for local and national responders. The UK Government must step up and show leadership by ensuring transparent monitoring and by ensuring a greater proportion of its humanitarian funding directly reaches local actors, specifically women-led and women's rights organisations. This will allow for more inclusive, sustainable, and transformative recovery and peacebuilding processes and for similarly stronger crisis prevention, resilience, and mitigation.

It is vital that the next WPS NAP reinforces and strengthens commitments to gender equality in crisis contexts across other humanitarian and political frameworks, and ensures interlinkages between humanitarian action and the WPS agenda. This should be aligned with the UK's involvement in the external agendas of the Generation Equality Forum's Women, Peace and Security and Humanitarian Action (WPS-HA) Compact, and the Call to Action on Protection from GBV in Emergencies as a means to work collectively to improve the engagement, leadership, and participation of local organisations and local leaders, particularly women and women's organisations.

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<sup>51</sup> Development Initiatives (2022), [Funding for gender-relevant humanitarian response](#)

<sup>52</sup> ActionAid (2022) [Leading the Way: The Nexus through a Feminist Lens](#)

## Recommendations

The UK Government should:

- **Prioritise women's protection and empowerment in humanitarian** crises by ensuring all UK ODA 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 spends 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 that partnerships that aim to build gender equality and promote Sustainable Development Goal 5 in protracted humanitarian contexts are long term and flexible** to facilitate nexus approaches across humanitarian, development, and peacebuilding activities.

## 10. Gender-based violence and violence against women and girls

The UK remains well placed to meaningfully contribute to global efforts aimed at ending GBV in all its forms. While UK statements on ending GBV and support for survivors of GBV are welcome, these are undermined by a lack of concrete action, reductions in overseas development and ODA spending, continued failure to seriously implement the Arms Trade Treaty provisions on GBV (see below), and obdurate attitudes to accepted international human rights standards (exemplified by the reservations made in ratification of the Istanbul Convention and the planned replacement of the Human Rights Act – which provides essential legal protections and tools for victims and survivors of GBV – with a British 'Bill of Rights'). While there were important developments in 2022, including the Preventing Sexual Violence Initiative Conference (outlined below), more must be done to ensure the UK's contribution to the global fight to end GBV goes further than 'lip service.'

The UK Government finally ratified the Istanbul Convention, with the convention coming into force on 1 November 2022, following a key recommendation of GAPS' shadow reports over the last four years. The UK is the 37th state to ratify the convention. The UK Government, however, reserved article 59, which sets out state obligations to provide protection to migrant women. By doing so, the UK Government is also acting against one of the main principles of the convention, which requires countries to implement its provisions without discrimination on any

grounds, to ensure no one is left behind. The UK Government should immediately remove the reservation to article 59 and provide equal protection for all women, irrespective of migration status.

The UK Government hosted its long-awaited follow-up conference for its PSVI in November 2022, after several years of delays. The conference – the second of its type following the PSVI Summit of 2014 – was first scheduled for 2019 before being postponed. Whilst the conference did include survivor representation (and benefited from advanced engagement with the PSVI Steering Board, a Survivor Advisory Group, and GAPS), meaningful and diverse participation of women and girls could have been greatly improved, including through:

- Earlier organisation of the conference (including an earlier confirmed programme and invitees). This would have made representation of women and girls from the global majority much easier and more effective, especially given restrictive UK visa rules.
- Satellite and online events in different parts of the world to reduce financial and visa barriers to participation.
- Greater policy consultation with global civil society ahead of the conference, including through surveys, workshops, and consultation sessions, especially on the conference's 'Political Declaration'.
- Systematic efforts to encourage and facilitate the participation of adolescent girls and young women at the conference. With a few exceptions, the absence of youth voices was stark.
- Dedicated support to youth networks, both to facilitate attendance on the day and to help with planning and policy formulation.

It should also be noted that, despite an advanced GAPS briefing paper on making the conference survivor-centred, best practice was not followed at all times.<sup>53</sup> Providing a platform to Ivica Dacic risked traumatising survivors and others (given his previous support for Slobodan Milošević).

Whilst initial concerns were raised in early 2022 that the UK Government was planning to use the conference to push for a duplicative new international convention on sexual violence in conflict, the eventual aims and objectives of the conference were more positively aligned with prevention and root causes, as recommended in the GAPS shadow report last year. The objectives of the conference included prevention, justice, and accountability, and supporting survivors of and children born from sexual violence in conflict, and side events focused on topics such as the power of education in tackling GBV; the role of women peacebuilders and WROs; and improving responses to SGBV against LGBTQIA+ people. Useful references were included in the Political Declaration to strengthening national justice systems (as recommended by the 2021 GAPS shadow report), though these too could have been more detailed and ambitious, and in their national commitments states could have been encouraged to focus more on this area (though it should be noted that Colombia, DRC, Lithuania, Nigeria, and Timor Leste did make specific commitments on their national justice systems). The UK's commitment to important, high-profile initiatives, such as the Murad Code and the Global Survivors Fund, is also welcome, though must be accompanied by further support to a wider range of actors working with survivors of GBV at a grassroots level.

Ultimately the long-term success of the conference will depend on sustained follow-up and implementation, including on flexible, multi-year funding; a shift of power and resources to local partners and women's rights and youth-led groups (in line with Grand Bargain commitments and the commitments set out in the Generation Equality Forum GBV Action Coalition and WPS-HA Compact); and ongoing political leadership at the highest levels.

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<sup>53</sup> GAPS (2022), [APPG on WPS Ensuring the PSVI is survivor centred](#)

Over the last years, the UK Government has continuously championed advocacy for increased quality GBV funding through the Call to Action, as a co-lead of the Funding Task Team. However, at the very same time the financial support for the prevention of and response to GBV in emergencies has suffered a considerable loss, as part of the overall cuts to the ODA budget. Lastly, the Independent Commission for Aid Impact's (ICAI) PSVI recommendations<sup>54</sup> of January 2020 arguably remain unmet. Whilst the PSVI Conference galvanised efforts and coordination across the FCDO, continued improvements are needed to the design, monitoring, and evaluation of PSVI programmes – the design of programmes still needs to be more survivor-led and a systematic learning process is yet to be established. The launch of the second 'What Works to Prevent Violence' Programme is an important investment and presents an opportunity to operationalise the ICAI recommendations by ensuring that the evidence generated in the second iteration will be used to inform policymaking across the different policy portfolios.

In addition, the PSVI initiative continues to exclude victims and survivors of conflict-related sexual violence seeking refuge in the UK. Not only does this ignore the UK's international obligations towards asylum seekers, it also damages the credibility of the PSVI initiative as the UK seeks to bolster action in other countries that are already hosting a far higher number of refugees.<sup>55</sup>

## Recommendations

The UK Government should:

- **Apply lessons learnt** from the PSVI Conference to ensure that future UK Government convened and supported events are survivor-centred at all times and more inclusively facilitate meaningful and diverse participation of women, particularly women from the global majority (i.e. the Global South), as well as adolescent girls and young people.
- **Put in place strong mechanisms to ensure** sustained follow-up and implementation from the conference, including on the Political Declaration. More ambitious and specific international targets should also be encouraged over the next year, especially on transferring power to local partners and strengthening national justice systems.
- **Remove its reservation to article 59 of the Istanbul Convention** and provide equal protection for all women irrespective of migration status immediately.
- **Adopt a policy coherence approach to PSVI**, starting from the recognition that survivors are entitled to safe passage to seek safety and that the failure to do so exacerbates their risk to GBV, including sexual violence.
- **Implement ICAI's PSVI recommendations of January 2020 in full.**
- **Fully uphold its financial commitments** to prevent and respond to GBV in emergencies and continue to strive to make humanitarian ODA more accessible for local women's organisations.

<sup>54</sup> ICAI (2020), [Report: The UK's Preventing Sexual Violence in Conflict Initiative](#)

<sup>55</sup> UNHCR (2022), [Refugee Statistics](#)

## 11. Effectiveness, Coordination, and Process

GAPS welcomes the continued collaboration and working relationship with UK Government officials focusing on the WPS agenda. The ongoing engagement between GAPS and the cross-Whitehall Working Group on WPS have provided both parties with opportunities to regularly share updates, monitor progress on the delivery of the NAP, as well as share policy recommendations at quarterly meetings. GAPS sees this as crucial for follow up on the government's commitments and as part of an accountability mechanism when commitments are not being met.

GAPS further welcomes the UK Government's ratification of the Istanbul Convention on Preventing and Combating Violence Against Women and Domestic Violence. This comes in light of the UK's exploration of taking forward a new Political Declaration to help galvanise the international community and raise the bar to better prevent and respond to conflict-related sexual violence as part of the PSVI.<sup>56</sup>

Unfortunately, it seems that for yet another year of the NAP, the high-level WPS Steering Committee chaired by Lord Ahmad of Wimbledon has remained dormant. A lack of meetings within the Committee reflects weak ministerial interest and engagement with the WPS agenda. The PSVI Steering Board, which is also chaired by Lord Ahmad and includes parliamentarians, NGOs, survivors, academics, and other experts, has contributed to the development of the PSVI Conference. This does not, however, reflect a wider commitment to the WPS agenda by ministers.

To support staff and partners in implementing policy and programme interventions in accordance with Strategic Outcome 7 of the UK NAP on WPS, the UK Government was meant to develop Guidance Notes on the strategic outcomes. The final two of the six Guidance Notes on Decision Making and Security and Justice were published in June 2022. While GAPS welcomes and acknowledges the hard work and cross-government efforts of staff to publish those Guidance Notes, it is disappointing that they were only finalised and published in the final implementation year of the 2018–2022 UK NAP. Moving forward, the UK Government must ensure Guidance Notes are included in work and budget plans for their delivery at the start of the NAP's implementation period.

Unfortunately, country-specific gender strategies were not made available for all NAP focus countries as per GAPS recommendations from previous years. The UK Government must conduct a meaningful consultation process<sup>57</sup> with grassroots and local women's organisations from focus countries to publish all gender strategies before the publication of the new NAP, and produce publicly shared documents to ensure transparency and to share knowledge and learning with implementers, civil society, and other governments.

Integration of the WPS agenda into the government's broader conflict and security work must be strengthened, including greater coordination across Whitehall on implementing the NAP domestically. GAPS has commended the gender, conflict and stability training which had been delivered to staff working in or on FCAS prior to 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 to ensure gender and conflict sensitivity is rolled out across all departments and ways of working.

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<sup>56</sup> UK Government (2022), [PSVI Initiative 2022](#)

<sup>57</sup> GAPS (2019), [Beyond Consultations](#)

As the Integrated Review and the Ministry of Defence's (MoD) Joint Services Publication (JSP) 1325 published during this NAP's implementation period failed to do so, the government must ensure gender is mainstreamed across all work and must clearly implement the WPS agenda across all work streams and departments. This will ensure WPS is prioritised throughout the UK's work internationally as well as domestically. GAPS calls for and encourages the improved sharing and coordination of NAP supporting documents between government departments. 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:

- **Ensure Guidance Notes are included in work and budget plans for their delivery at the start of the NAP's implementation period.** Local and grassroots WROs should be meaningfully consulted and all documents must be made 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.

## 12. The UK NAP and the Arms Trade Treaty

The Arms Trade Treaty (ATT) is the first legally binding international agreement, which makes the connection between GBV and the arms trade. GAPS commends the UK for its role in the development and adoption of the ATT. In December 2021, the UK Government announced an amended set of strategic export licensing criteria.<sup>58</sup> These form the national-level legally binding framework, which the government describes as meeting all the relevant obligations under the ATT. Four of the eight criteria include an explicit obligation to take into account whether the conventional arms to be exported might be used to commit or facilitate gender-based violence or serious acts of violence against women or children. These changes are to be welcomed.

However, GAPS has concerns about the implementation of the UK's national and international obligations, and has identified several areas in which the UK Government can take a stronger lead in helping to set an ATT-compliant standard internationally. According to the UK's latest defence statistics,<sup>59</sup> on a rolling ten-year basis the UK has been the second largest global defence exporter in the world based on sales (rather than actual deliveries). Sales have however recently been falling year-on-year, from £14 billion in 2018 to £5.5 billion in 2021. In 2021 the UK was the world's fifth-largest arms exporter, with 6 per cent of total global arms export sales.

<sup>58</sup> Secretary of State for International Trade (2021), [Parliament: written statements](#)

<sup>59</sup> UK Government (2021), [UK defence and security export statistics: 2021](#)



The Middle East has long been the main export market for UK arms; it was the destination for 57 per cent of UK arms sales for the period 2012– 21.

The UK's longstanding practice of exporting vast quantities of arms to Saudi Arabia has continued since the beginning of the war in Yemen in 2015, a conflict the UN has called the 'world's worst humanitarian disaster',<sup>60</sup>  
<sup>61</sup> <sup>62</sup> <sup>63</sup> in the last report by the UN Group of Eminent Experts.<sup>64</sup> The GEE was disbanded in 2021, following intense lobbying by Saudi Arabia and the UAE. While continuing the sales of arms the UK has also cut ODA to the country by 59 per cent overall and reduced its contribution to UNFPA by 85 per cent.<sup>65</sup> In mid-2020, following a one-year hiatus after the Court of Appeal ruled that the sale of arms to Saudi Arabia was unlawful; the UK resumed issuing new licences for arms to Saudi Arabia.<sup>66</sup> From July 2020 to 30 June 2022 (the latest date for which figures are available), the UK has issued *inter alia*:

- 237 standard individual export licences for military items, covering items from 18 out of the UK's 22 Military List categories, to a value of over £2.5 billion.
- 33 permanent open individual export licences, which cover an extremely expansive range of items but which typically place no upper limit on the quantities or value of items that can be transferred.<sup>67</sup>

The UK Government is currently facing further judicial action regarding the legality of approving arms transfers to Saudi Arabia.<sup>68</sup> Evidence gathered over decades 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.<sup>69</sup> <sup>70</sup> The 2021 Integrated Review and the 2022 International Development Strategy reference the government's ongoing commitment to gender equality, peace and security.<sup>71</sup> However, its arms trade practices undermine these aims. 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 its national and international arms export obligations is a key component in realising the WPS agenda. In this context, the government should do more to explain the ATT and how in practice it will be used for preventing arms transfers, which could facilitate GBV. The UK Government should seek to encourage other ATT States Parties to adopt similar rules.

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<sup>60</sup> Campaign Against the Arms Trade (2023), [UK Arms to Saudi Arabia](#)

<sup>61</sup> Campaign Against the Arms Trade (2021), [True value of UK arms trade to Saudi Arabia worth over £20 billion since 2015](#)

<sup>62</sup> CNN (2018), [The Yemen war is the world's worst humanitarian crisis, UN says](#)

<sup>63</sup> Human Rights Watch (2020), [Yemen: Events of 2019](#)

<sup>64</sup> UN OHCHR (2021), [Report of the Group of Eminent International and Regional Experts on Yemen](#)

<sup>65</sup> Devex (2021), [UK cuts family planning funding to UNFPA by 85%](#)

<sup>66</sup> Despite the ban on issuing new licences from mid-2019 to mid-2020, the UK continued to allow arms to be exported under pre-existing licences.

<sup>67</sup> UK Government (2023), [Strategic Export Controls, Licensing statistics for arms exports to Saudi Arabia, 1 July 2020-30 June 2022](#),

<sup>68</sup> UK Government (2021), [Strategic Export Controls, Licensing Statistics 2021](#)

<sup>69</sup> WILPF (2016), [Gender-Based Violence and the Arms Trade](#)

<sup>70</sup> WILPF, [Challenge the Arms Trade and Armed Violence](#)

<sup>71</sup> UK Government (2021), [Global Britain in a Competitive Age: The Integrated Review of Security, Defence, Development and Foreign Policy](#)

## Recommendations

The UK Government should:

- **Regulate its sales of arms in strict compliance with all the provisions of its Strategic Export Licensing Criteria and the ATT**, regardless of the recipient or destination.
- **Elaborate and publish how it operationalises the GBV-related elements** in the 2021 Strategic Export Licensing Criteria and the ATT.
- **Develop and conduct training** on the relationship between GBV, arms, and arms transfers for export licensing and diplomatic personnel working on all disarmament issues, drawing on expertise from the non-governmental sector.
- **Conduct robust and transparent gendered impact assessments** of international arms transfers to ensure that UK-sourced arms are not used to commit or facilitate acts of GBV, taking full account of reports of the use of GBV or serious acts of violence against women and children and in strict compliance with all the relevant provisions of its Strategic Export Licensing Criteria and the ATT.
- **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.
- **Rebuild its relationship with EU Member States** with respect to export licensing policy and practice; 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.
- **Encourage the US to re-sign and ratify the ATT** as part of its review of its conventional arms transfer policy.



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