The United Kingdom's fragility, crisis and humanitarian assistance

This chapter first reviews the United Kingdom's efforts to engage in fragile, and conflict and crisis-affected contexts. It assesses the United Kingdom's political directives and strategies for working in these contexts; the extent to which programmes are designed coherently to address key drivers of fragility, conflict and disaster risk, the needs of women and the most vulnerable; and whether systems, processes and people work together effectively in responding to crises.

The second part of the chapter considers the United Kingdom's efforts to fulfil the principles and best practices of humanitarian donorship. It looks at the political directives and strategies for humanitarian assistance, the effectiveness of the United Kingdom's humanitarian programming, whether it targets the highest risk to life and livelihoods, and whether approaches and partnerships ensure high-quality assistance.

In brief

Tackling crises and fragility sits at the core of the United Kingdom's development co-operation

The United Kingdom's National Security Capability Review of 2018 and the Building Stability Overseas framework have further reconciled a long-lasting commitment to peace and stability with development co-operation objectives and the protection and promotion of the United Kingdom's national interests. This strategic and organisational shift has led the United Kingdom to define solid strategies and instruments linking stability and development in fragile countries, backed by significant resources allocated to fragile and crisis contexts.

By bringing development and peace actors into a common framework, the Fusion Doctrine has further strengthened the United Kingdom's whole-of-government approach to crises. In acknowledging the complexity of crises, the United Kingdom has been able to adapt its programme design and instruments together with its partners. In particular, the Conflict, Stability and Security Fund (CSSF) offers many opportunities for coherent and targeted engagement in crises, even if it entails a high level of accountability and management. The United Kingdom is well equipped to analyse conflict risks and to factor fragility into its programming, but stringent due diligence requirements prevent the United Kingdom from sharing risk effectively with its partners in the field.

Widely recognised as a key player in fragile and humanitarian contexts, combining its field and thematic expertise with flexible funding, the United Kingdom champions pursuit of the humanitarian-development-peace nexus through concrete measures to align its bilateral engagement and to steer United Nations (UN) reform. As with its development partnerships, however, the United Kingdom's efforts are constrained by a focus on value for money. This is affecting partnership with field operators, who feel they are treated as contractual agents.

The United Kingdom has the ambition and the means to help the humanitarian response system to react better to new types of crises. It seeks results and efficiency in its humanitarian programming. Allocation criteria are clear and results and impact are closely looked at, and used to improve the Department for International Development's (DFID's) programming. Similar to most Development Assistance Committee (DAC) members, the United Kingdom's systems are not geared towards localising aid as much as the Grand Bargain demands, but the United Kingdom supports local humanitarian responders through indirect means, as well as through more innovative approaches.

DFID has a strong field presence, and country teams look at the whole spectrum of needs, including humanitarian assistance, which helps ensure a comprehensive response to crises. When required, DFID sends humanitarian advisors to assist country teams or manage the humanitarian response in the field.

7.A Crises and fragility

Strategic framework

A peaceful and stable world is in the United Kingdom's national interest

The United Kingdom positions itself as a strong proponent of international peace. As stated in its 2015 Aid Strategy, the United Kingdom uses its development budget to help tackle the causes of the security threats it faces (HM Treasury and DFID, 2015[1]), resulting in an increased focus on stability and crisis prevention. As part of the National Capability Security Review, a new security doctrine, the Fusion Doctrine was developed in 2018 to improve the United Kingdom's collective approach to national security. The doctrine calls for the United Kingdom to use the full range of its security, economic and influencing capabilities to achieve its strategic priorities (HM Government, 2018[2]). The doctrine now underpins the United Kingdom's engagement in fragile contexts, including through official development assistance (ODA) expenditure. While the doctrine is primarily about safeguarding the United Kingdom's own security interest and priorities, the United Kingdom explicitly links poverty reduction goals to its national interest – an approach which is increasing adopted by DAC members.

The United Kingdom's crisis response is coherent and multidimensional

Demonstrating that crises can affect the United Kingdom's interests worldwide, the aid strategy focuses on crisis response and crisis risks, bringing added value for taxpayers (HM Treasury and DFID, 2015_[1]). A set of guidance and instruments has been developed that is underpinned by the Fusion Doctrine and aligned with the aid strategy. In particular, DFID has clarified its role in accompanying countries out of fragility in a Building Stability framework that carefully links development and peace (DFID, 2016_[3]). DFID has also updated its humanitarian strategy, building on the United Kingdom's active role in reforming the humanitarian sector well before the World Humanitarian Summit (DFID, 2017_[4]). Developed with the same overarching objective of strengthening global peace, these two documents are complementary. The United Kingdom understands that crises are multidimensional and that expertise from different government departments should therefore be mobilised². A crisis like Ebola for example, has humanitarian, economic and security causes and consequences, and the United Kingdom mobilised several departments to tackle the West Africa outbreak in 2015 (HM Government, 2019_[5]) and more recently in Central Africa.

The United Kingdom's spending on fragility is ambitious, but declining

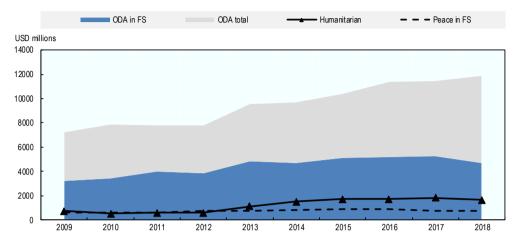
Even before the 2015 Aid Strategy was released, DFID had met its ambitious target to spend at least 50% of its ODA annually in the countries included in DFID's list of fragile states.³ This demonstrates the United Kingdom's significant spending on humanitarian assistance and peacebuilding activities, notably through the CSSF, whose ODA share is increasing.⁴ In addition, noting the magnitude of the displacement crisis in the Middle East since 2011, the Aid Strategy set aside a USD 667 million (GBP 500 million) crisis reserve to allow flexibility in responding to emerging crises.

Using the OECD fragility framework for comparability across DAC members, the United Kingdom's bilateral ODA for fragile states declined by 11% from 2017 to 2018 following several years of steady increase (Figure 7.1). This decline was particularly marked for the top five recipients of the United Kingdom's bilateral ODA, all of which are fragile (Table B.4). Reaching a peak in 2017 after several years of growth, the United Kingdom's humanitarian expenditure also declined in 2018. It nonetheless remains high, reaching USD 1.7 billion in 2018 (OECD, 2020[6]) with an increased allocation to the Central Emergency Response Fund (United Nations, 2018[7]). Building on DFID's Building Stability Framework that provides an evidence-based assessment of how DFID's work can address the drivers of conflict and fragility, there

is scope for the United Kingdom to continue to increase the level of its development and peace programming by identifying ways to address the structural drivers of humanitarian needs. This would be in line with the DAC Recommendation on the Humanitarian Development Peace Nexus (OECD, 2019_[8]).

Figure 7.1. The United Kingdom's spending in fragile and crisis-affected countries is falling

Constant 2017 USD million



Note: ODA in fragile states is based on the OECD fragility framework. Up until 2019, DFID used its own list of fragile contexts to measure its allocation to fragile contexts (DFID, 2018_[9]).

Source: OECD (2020_[6]), Creditor Reporting System, https://stats.oecd.org/index.aspx?DataSetCode=CRS1; OECD (2020_[10]), OECD Fragility Framework, https://www3.compareyourcountry.org/states-of-fragility/overview/0/ (accessed on 23 March 2020).

StatLink https://doi.org/10.1787/888934178506

Effective programme design and instruments

The Fusion Doctrine has further strengthened a whole-of-government approach to crises

The United Kingdom's whole-of-government approach to crises was already applauded in the 2014 peer review (OECD_[11]). Since then, the Fusion Doctrine has further clarified the accountability lines and brought DFID onto equal footing with other departments, under the authority of the National Security Council (HM Government, 2018_[2]). In addition, the Fusion Doctrine and International Development Act (UK Parliament, 2002_[12]) make it clear that development co-operation has a poverty reduction objective, helping to ensure that all ODA remains aligned with 2030 Agenda for Sustainable Development (HM Government, 2018_[2]).

The United Kingdom analyses risk but partners feel risk is transferred to them

Risk-informed context analysis and programming are at the heart of the United Kingdom's development co-operation and the United Kingdom has developed solid conflict and political economy analysis tools. Cross-department analysis of the drivers of conflict was introduced as early as 2011 in a holistic effort to identify which interventions are most likely to help prevent conflict and build stability. Each country team integrates risk analysis into its country development diagnostic and in some of the most fragile contexts, country teams analyse conflict drivers and dynamics. These Joint Analyses of Conflict and Stability (Stabilisation Unit, 2017[13]) feed into both country programmes and wider strategy. While the United Kingdom is willing to provide aid in risky environments, partners feel that this willingness is eroded by a domestic political context that leads the administration to avoid both fiduciary and security risks.

Consequently, while risks are carefully identified, the United Kingdom's implementing partners are unanimous in finding that additional due diligence and the focus on value for money increasingly result in risk being transferred to partners (Chapters 4 and 5). A high level of risk aversion can be at odds with engaging in the most challenging contexts that are inherently risky and expensive, and for which the United Kingdom has deliberately designed holistic policies and specific instruments.

The Conflict, Stability and Security Fund is an effective crisis response instrument

In addition to its development co-operation and humanitarian assistance, the United Kingdom launched the CSSF in 2015: a cross-government fund that can integrate both ODA and non-ODA resources to strengthen peace and resilience in contexts at risk of conflict and instability (Chapter 4). The CSSF makes the United Kingdom one of the very few DAC members to have a blended instrument on peace and stability, giving much flexibility to its engagement in conflict prevention or crisis responses. However, as seen in Kenya and Jordan (Annex C), duplication of processes between the Joint Funds Unit and the implementing department can constrain the swift mobilisation of funds in rapidly evolving contexts. While a significant proportion of the CSSF funding is multi-annual, there is also an intention to catalyse programmes with shorter-term funding in the hope that they are scaled up by other departments. This process can take time and some catalytic programmes have bid for several rounds of annual CSSF funding.

The United Kingdom is driving better approaches to manage forced displacement

Most of the protracted crises in which the United Kingdom engages entail large and long-term protracted displacements of populations; recognition of this fact has been at the heart of recent policy changes. Responding to forced displacement in a way that supports refugee self-reliance while also benefitting host communities is an important focus of the United Kingdom's humanitarian policy, and most of the humanitarian budget increase up until 2018 was allocated to crises involving massive forced displacement (OECD, 2020[6]).

The United Kingdom recognises that countries hosting refugees provide a global public good and that humanitarian assistance alone is not sufficient in such contexts. As a result, the United Kingdom has been instrumental in designing new ways to ease pressure on host countries and to enhance the economic self-reliance of refugees, targeting assistance based on vulnerability assessments rather than solely on refugee status. The United Kingdom has been particularly innovative in doing this, from supporting economic integration through identity management (GSMA, 2017_[14]) to stimulation of local trade (UNHCR, 2015_[15]). In Kenya, where the government favours camps over economic activity for refugees, the United Kingdom has been a vocal advocate for more progressive policies. This is in line with several of the United Kingdom's international commitments such as the Global Compact on Refugees (United Nations, 2018_[16]) and the Comprehensive Refugee Response Framework (UNHCR, 2018_[17]).

The National Action Plan on Women, Peace and Security is expanding its focus

The United Kingdom (UK) links gender equality with peace and security. This makes its action on gender coherent with its other commitments and programmes to build security and stability overseas; to protect human rights of women and girls; and to promote their meaningful and representative participation in processes related to humanitarian assistance, conflict prevention and resolution. UK programming in crisis contexts is aligned with its latest National Action Plan on Women, Peace and Security (HM Government, 2018_[18]). The National Action Plan is recognised across government, including by the Ministry of Defence, who have expanded a comprehensive programme of training for UK and international officers. This includes the United Kingdom's Human Security Advisers Course as well as bespoke international training programmes which inform personnel on how to recognise, respond, refer and report on human rights violations. The scope of violations includes sexual violence, which has not historically been considered to

be part of daily military planning. This is all good practice. Building on its experience, the United Kingdom is becoming more ambitious, expanding its focus from five to nine countries in its latest National Action Plan and identifying seven thematic strategic outcomes.⁷

Effective delivery and partnerships

More use of country systems would be consistent with the fragile states principles

The United Kingdom is a strong supporter of the Fragile States Principles (OECD, 2011_[19]) and the New Deal (IDPS, 2011_[20]) and systematically applies many of these principles. It takes context as a starting point, ensures that programmes do no harm, links political, security and development objectives, acts fast while staying engaged and engages in practical co-ordination. DFID's 2016 Building Stability Framework provides guidance on which aspects of state-building are most likely to be effective in fragile and conflict affected contexts and the United Kingdom works with a broad range of partners to support state-building objectives, in line with a 2019 Governance Position Paper (DFID_[21]). However, while partners such as the International Financial Institutions and the European Commission strengthen and use country systems in fragile contexts, the United Kingdom seldom uses country systems and may specifically forbid its partners from doing so, as happened with UN agencies in Kenya (Chapter 5). A more consistent and coordinated emphasis on reinforcing national systems would strengthen the United Kingdom's political leverage in policy dialogue at country level.

Multilateral partnerships are strong, especially in the most difficult places

The United Kingdom sees multilateral partners as critical players in fragile states, for maximising leverage, pooling funds and mitigating risks. As a result, the United Kingdom is committed to ensuring that the multilateral system delivers (Chapter 2). It has thrown its political weight into the UN reform (UN News, 2017_[22]), supporting inter alia the Sustaining Peace agenda and the New Ways of Working initiative for humanitarian and development actors to work collaboratively (UNOCHA, 2017_[23]). Multilateral institutions are a dominant channel for UK ODA in fragile states increasing from 36% in 2014 to 44% in 2018. In particular, a large share of the UK humanitarian aid budget is channelled through UN agencies. At a strategic level, the United Kingdom has advocated for new instruments for multilateral organisations to engage in fragile states, such as the World Bank credit guarantee facility in Jordan (Annex C). In addition, doubling its contribution to the peacebuilding fund between 2017 and 2018 (UN, 2020_[24]) reflects the United Kingdom's renewed focus on peace and stability, a strategic objective.

Working with others has helped the United Kingdom bring about profound change

The United Kingdom often partners with other donors and multilateral initiatives in its work in fragile contexts. Joint initiatives with other donors – such as with the EU or with the Alliance Sahel, which the United Kingdom joined in 2017 – can be a determining factor in shaping the global crisis response system. For example, in Lebanon in 2016, the United Kingdom and the EU jointly issued a call for proposals for household cash transfers and independent monitoring and evaluation. The joint initiative shook the traditional humanitarian system but helped the move towards a more harmonised approach in the usually fragmented sector of humanitarian cash transfers.

Country budgets are designed for programming across the nexus between humanitarian, development and peace.

The nexus between humanitarian, development and peace is front and centre in the United Kingdom's policies and programming in fragile contexts. One of the main features of the United Kingdom's system that supports programming across the nexus is the fact that DFID country budgets do not have a specific

humanitarian or development allocation. This means that teams can choose how to blend short-term emergency responses and longer-term or structural programmes as the situation evolves. The United Kingdom is the only DAC member with such country-level flexibility. A key strength, it leaves the United Kingdom particularly well placed to operationalise the nexus approach coherently. In the most fragile contexts, whole of government mechanisms can support country teams that have sufficient delegated authority to make the best use of country budgets. For instance, director level boards can provide strategic direction and challenge on programme activity and spend, and the Stabilisation Unit can support teams to develop a shared understanding of the root causes of conflicts through research and analysis.

7.B Humanitarian assistance

Humanitarian assistance strategic framework

The United Kingdom's humanitarian policy reflects its global ambitions

The United Kingdom continues to have significant influence within the international humanitarian system, both as an important source of funding and as a committed policy-maker. As a result, the UK humanitarian policy focuses as much on reforming the global humanitarian system as it does on delivering its own humanitarian response. The United Kingdom has its own vision for reforming the humanitarian system, which builds on the outcome of the World Humanitarian Summit and the Grand Bargain (DFID, 2017_[4]). Similar to several other DAC members, the Syria crisis has played a significant role in shaping how it responds to protracted and intractable crises, as well as addressing the root causes of the displacement caused by those crises.

Effective humanitarian programming

The United Kingdom's humanitarian response is needs-based

The United Kingdom is a global humanitarian donor, and can respond to any crisis, according to different selection criteria. DFID has designed clear and publicly-available criteria for engaging in new crises that take a range of parameters into account (DFID, 2015_[25]).⁸ Since the last peer review, the United Kingdom has also invested more in tools like the Index for Risk Management (IASC and EC, 2019_[26]) to inform its programming. The United Kingdom provides humanitarian assistance where it deems it necessary, in line with its own and its partners' assessments, including in countries which are not ODA-eligible. For example, it provided significant humanitarian assistance to the Bahamas following Hurricane Dorian in 2019⁹ through the non-ODA portion of the CSSF (DFID, 2019_[27]). The United Kingdom advocated in the DAC for this type of humanitarian assistance to be recognised as ODA, resulting in a consensus that the ODA eligibility of countries could be re-assessed if they suffer a substantial and sustained drop in their GNI following major crises (DAC, 2017_[28]).

Local humanitarian responders are supported through direct and indirect channels

The United Kingdom made a commitment at the World Humanitarian Summit in 2016 to increase the accessibility of its funding to local humanitarian responders. Like most DAC members, the United Kingdom's systems are not designed to allow direct funding to local civil society (DFID, 2019_[29]), and indirect mechanisms are favoured in addition to core support to the Red Cross and Red Crescent movement. The United Kingdom is already the largest contributor to UN country-based pooled funds which can be accessed by local actors (UNOCHA, 2019_[30]). However, it is going one step further by supporting

facilities or funds that are specifically designed for local actors, such as the START Network (START Network, 2020_[31]) and the Humanitarian Assistance and Resilience Programme facility in Myanmar (HARP, 2018_[32]).

Monitoring and evaluation findings inform programming

Humanitarian projects are monitored by humanitarian advisors or through third party monitoring in the most challenging contexts. Third-party monitoring has become an integral part of DFID's monitoring and evaluation toolbox since it was first used in operations in Afghanistan and Somalia (Sagmeister and Steets, 2016_[33]). Even in difficult contexts, DFID strives to evaluate the longer-term impact of its humanitarian programmes (Laguardia, Lawerence-Archer and Abukar, 2015_[34]). This gives DFID the ability to learn, change course and adapt its business case as required (see also Chapter 6).

Effective delivery, partnerships and instruments of humanitarian assistance

Rapid response mechanisms can be used to boost country programmes

In addition to direct deployments of DFID specialised staff, rescue teams and the military, the United Kingdom has a range of well-tested mechanisms for responding rapidly to emergencies. These mechanisms use both the multilateral system – such as the Central Emergency Response Fund, to which the United Kingdom has been the biggest contributor since its creation (United Nations, 2020_[35]) – and bilateral modalities. For example, the Rapid Response Facility is DFID's fast-track funding modality for pre-registered non-government organisations based in the United Kingdom. In tandem, DFID is increasingly integrating Internal Risk Facility mechanisms as an internal insurance within country business cases to allow access to extra funds and rapid reaction resources if a predictable risk materialises such as a drought. This mechanism is mainly used to scale up a humanitarian response, as has been done in the Yemen programme over the past two years. However, some research suggests the modality could also be useful in development and peacebuilding contexts (Development Initiatives, 2019_[36]).

The United Kingdom could help bring coherence between the humanitarian imperative and counter-terrorism legislation

The United Kingdom advocates for humanitarian access to affected populations, favours local partnerships and has significantly increased the share of its humanitarian aid delivered through cash transfers (HM Government, 2019_[37]). However, there is a risk of incoherence between these efforts and the United Kingdom's strong counter-terrorism financing regulations which create constraints to working in the most complex environments. The United Kingdom is aware of this risk (FCO, 2019_[38]), and has initiated dialogue with humanitarian actors¹⁰ who are increasingly worried about the extent of their liability ¹¹ and their ability to deliver principled aid in contexts where terrorist groups or organisations also operate (Home Office, 2019_[39]). This is a sector-wide issue for all DAC members and all humanitarian actors, and the United Kingdom could use its global policy weight to help align security and humanitarian imperatives.

The United Kingdom is an engaged, flexible but exacting partner in the most challenging contexts

In its ambition to improve the international humanitarian system, DFID provides flexible, predictable and multiannual funding, helps its partners respond more effectively to emergencies, supports innovation and delivers a cash-based response at scale. This is in line with the United Kingdom's commitments under the Grand Bargain (DFID, 2018_[40]). DFID wants its operational partners to move in the same direction and demonstrate better value for money, even in the most difficult contexts.

Similar to the United Kingdom's other development partners (Chapter 5), humanitarian operators broadly consider DFID to be a flexible donor, aware of field realities and considerate of its partners. However, as already noted in the 2014 peer review (OECD, 2014[11]), contractual relations and management procedures remain complex. A small but increasing proportion of contracts are managed through private firms. The emphasis on demonstrating value for money is complemented by increased due diligence requirements. Such exacting measures draw DFID further away from its Grand Bargain commitments to streamline reporting requirements – a point also highlighted in internal evaluations (ICAI, 2018[41]).

Joint training initiatives contribute to smooth civil-military co-ordination

For the UK military, providing humanitarian assistance in response to natural disasters is standard business. It is, for example, an explicit activity of the Royal Navy (Royal Navy, 2019_[42]) and regular joint drills are conducted with DFID and military staff, so that civil-military co-ordination is managed smoothly and according to humanitarian principles when a disaster strikes.

Organisation fit for purpose

Humanitarian assistance is not a silo within DFID

Within DFID, the Conflict, Humanitarian and Security Department's Humanitarian Response Group will lead the response to a rapid onset crisis; both in support of a DFID country team or regional team or where there is no DFID country office, bilateral programme or desk. A single programme budget to preserve both development and humanitarian mandates and principles reinforces the central role of country teams, who have to consider the humanitarian needs as part of their programming, and represents good practice. As a result, and unlike many DAC members, humanitarian assistance is not an add-on, but is fully embedded into country programming. DFID is one of the few humanitarian donors with a consistent field presence, primarily ensured through a dedicated cadre of DFID humanitarian experts, supported and supplemented by a roster of humanitarian experts contracted through a private firm.¹²

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UNOCHA (2017), New way of working, https://www.agendaforhumanity.org/sites/default/files/20170228%20NWoW%2013%20high%20res.pdf (accessed on 24 December 2019).	[23]

Notes

- ¹ For example, in seeking long-term solutions to protracted crises the United Kingdom hosted the 2016 Syria conference, convening the main donors and partners and helping to create the Jordan Compact. See https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/jordan-compact.pdf. In 2014, the United Kingdom also hosted a summit on sexual violence in conflict in which over 120 countries participated. See www.gov.uk/government/topical-events/sexual-violence-in-conflict. This helped to end impunity in the use of sexual violence as a weapon of war.
- ² See for example DFID-UNHCR-World Bank work on Building the Case for Forced Displacement www.worldbank.org/en/topic/fragilityconflictviolence/brief/building-the-evidence-on-forced-displacement-a-multi-stakeholder-partnership (accessed on 23 March 2020).
- The DFID list of fragile states differs from the OECD's fragile state grouping see www.oecd.org/dac/conflict-fragility-resilience/statesoffragilityframework2018.htm (accessed on 27 March 2020; updated annually). It takes into consideration countries that are not fragile in the OECD grouping, but that are affected by a crisis, or neighbouring a "high fragility" state, such as Jordan and Lebanon. For more, see the fragile state indicator description at www.oecd.org/dac/conflict-fragility-resilience/statesoffragilityframework2018.htm (accessed on 27 March 2020; updated annually). It takes into consideration countries that are not fragile in the OECD grouping, but that are affected by a crisis, or neighbouring a "high fragility" state, such as Jordan and Lebanon. For more, see the fragile state indicator description at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/72238 9/Methodology-Note-Fragile-and-conflict-affected-states-and-regions.pdf.
- ⁴ The ODA share of the CSSF increased from 3.9% to 4.2% of total UK ODA between 2017-18. See Statistics on International Development Provisional UK Aid spend 2018 at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/79268
 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/79268
 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/79268
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- ⁵ These joint analyses have been conducted in, for example, Somalia, Pakistan, Libya, Myanmar, Sudan, Central Asia, South Caucasus and Moldova, Iraq, Yemen and the Western Balkans.
- ⁶ The closest to the CSSF is Denmark's Peace and Stabilisation Fund. See https://fmn.dk/nyheder/Documents/Denmarks-Integrated-Peace-and-Stabilisation-Engagements-2018.pdf
- ⁷ Afghanistan, Myanmar, Democratic Republic of Congo, Iraq, Libya, Nigeria, Somalia, South Sudan and Syria.

 See https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/67758
 6/FCO1215-NAP-Women-Peace-Security-ONLINE V2.pdf.
- ⁸ Intervention criteria for humanitarian response take into account the humanitarian impact, the national position, other donors' action, and the United Kingdom perspective on the crisis creating humanitarian needs.

 See https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/43916
 2/Intervention Criteria Template UPDATE 22062015 1600.pdf.
- ⁹ Assistance to countries like the Bahamas that are not on the list of ODA-eligible countries is funded from the non-ODA budget in the CSSF.

- ¹⁰ To discuss the impact of counter-terrorism legislation, sanctions and other regulatory or licensing regimes, the UK Government has established a multi-stakeholder working group on international non-governmental organisations' operations in high risk jurisdictions. Formally established in 2017, the Tri-Sector Working Group comprises representatives from UK government and regulators, financial institutions and civil society organisations. The Office of Financial Sanctions Implications, the Charity Commission for England and Wales, the Department for International Trade, Foreign and Commonwealth Office (and others) separately provide various guidance and supplementary documents to assist with compliance and challenges in this area.
- ¹¹ Humanitarian operators are requested to undertake "downstream" risk assessments to ensure their aid is not benefiting directly or indirectly proscribed terrorist groups or organisations as per UK legislation. See https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/84949
 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/84949
 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/84949
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 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/system/uploads/attachment_data/file/84949
 <a href="https://assets.publishing.service.gov.uk/government/uploads/system/up
- The company is currently Palladium. See *Palladium: Areas of Expertise*, https://thepalladiumgroup.com/areas-expertise/humanitarian-aid (accessed on 23 March 2020).



From:

OECD Development Co-operation Peer Reviews: United Kingdom 2020

Access the complete publication at:

https://doi.org/10.1787/43b42243-en

Please cite this chapter as:

OECD (2020), "The United Kingdom's fragility, crisis and humanitarian assistance", in *OECD Development Co-operation Peer Reviews: United Kingdom 2020*, OECD Publishing, Paris.

DOI: https://doi.org/10.1787/5e1259b4-en

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