Written Evidence Submission to the International Development Committee

Inquiry: Humanitarian Access and Adherence to International Humanitarian Law

Submitted by: Global Interagency Security Forum (GISF)
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Introduction

1. The Global Interagency Security Forum (GISF) welcomes the International Development Committee's inquiry on Humanitarian Access and Adherence to International Humanitarian Law. This written evidence was developed in consultation with the safety, security, and access professionals from GISF's diverse membership of 130+ International NGOs (INGOs).

2. The risks involved in serving the world's most vulnerable continue to grow. 2024 became the deadliest year on record for aid workers, with 320 aid worker fatalities among nearly 600 total victims (killed, injured, or kidnapped).[1] This stark figure is almost certainly affected by underreporting, yet underscores both the ongoing failures of IHL compliance and the pressing need for more robust security risk management (SRM). The growing risks render vast areas effectively inaccessible to most aid organisations, with local organisations and volunteer groups shouldering increasing responsibilities to continue delivering aid without the same donor-funded SRM resources received by larger (INGOs).

3. Over two decades, GISF has documented how practical SRM policies and practices, coupled with consistent diplomatic and donor support, enable aid agencies to access and operate in conflict-affected and high-risk environments. And yet IHL non-compliance introduces the most complex, resource-intensive risks to be navigated by humanitarian actors. In this submission, GISF responds to Questions 1-6 posed by the Committee, focussing on policy changes, funding structures, and effective risk sharing strategies that can better protect aid workers and enhance humanitarian access.

Written Evidence

Q1. What are the current trends in adherence to international humanitarian law in conflicts, particularly regarding the safe delivery of humanitarian assistance?

4. Contemporary conflicts show widespread, systematic violations of IHL. Bombing events and remote violence nearly doubled as of 2022,[2] driving a staggering five-fold increase in aid worker casualties from airstrikes and shelling by 2023-2024.[3] These assaults—indiscriminate or sometimes targeted—are often attributed to state forces, and significantly amplify the scale of risks faced by aid workers.

5. In contexts like Syria, Yemen, Ukraine, Gaza, and Sudan, state and non-state actors frequently disregard or exploit humanitarian corridors, endangering both civilians and aid workers. Although international consensus on civilian protection exists, weak enforcement

[1] Data from the Aid Worker Security Database (AWSD): https://www.aidworkersecurity.org/
[2] ACLED (2024). Conflict Index: December 2024, Global conflicts double over the past five years; Insecurity Insight. (2025). Hovering Threats: The challenges of armed drones in humanitarian contexts.
[3] Data from AWSD.

mechanisms, driven by limited political will of member states, and fragmented conflict parties mean that on-the-ground compliance with IHL remains inconsistent at best.[4] The normalisation of IHL non-compliance by state actors further undermines efforts to incentivise non-state actors to adhere to these laws.

6. In parallel, modern warfare has grown in complexity and scale: large-scale conflicts with multiple armed factions, localised conflicts spanning international borders, and rapidly shifting frontlines strain humanitarian operations, while new technological developments and the weaponisation of information create additional risks. Digital warfare, including disinformation and propaganda, undermines humanitarian acceptance and heighten risks for aid workers. While legal norms remain essential, they often fail to keep pace with the evolving challenges faced by aid workers. Enhanced political, diplomatic, and operational measures—coupled with robust security policies and practices—are therefore crucial to protect aid workers and sustain life-saving assistance in these challenging environments.

Q2: What impact does non-adherence have on both the physical access to humanitarian supplies and the safe operation of aid workers?

7. GISF and its members have been clear on this matter: **IHL non-compliance introduces the most complex, resource-intensive risks to be navigated by NGOs.**

8. Non-compliance with IHL directly jeopardises the safe delivery of aid, forcing organisations to curtail or suspend operations. In many conflict zones, supply routes become highly insecure or are intentionally blockaded, effectively cutting off entire communities from urgent assistance. Administrative and legal obstacles—like restrictive visas or the politicised use of counterterrorism legislation—compound these security issues, further shrinking the humanitarian space. Preventing the free passage of relief supplies is in direct contravention of the Geneva conventions.

9. For aid workers, non-adherence to IHL manifests as heightened exposure to explosive weapons, systemic detention, and harassment. Again, the current system incentivises INGOs to transfer risk to local frontline aid workers—staff of local and national NGOs or nationally-recruited INGO staff—who bear disproportionate risks. A 2024 global survey of more than 700 frontline workers capture the stark reality of these layered risks: more than a quarter face serious safety and security threats on a *daily basis*, while nearly a quarter feel unsafe or very unsafe in their work.[5] In 2024, 96% of aid workers killed were national staff of INGOs and those of local and national NGOs,[6] continuing a trend from previous years.

10. The increasing risks that aid workers face are magnified by insufficient funding for security measures, like staff capacity building, operational risk mitigations, or post-incident care. Donors' tendency to transfer risks to implementing organisations without commensurate security funding leaves aid organisations increasingly exposed within dangerous contexts. While larger NGOs have somewhat better access to security resources, local and national NGOs, often the most exposed to risks, continue to operate with the least protection.[7] As

[4] GISF and Humanitarian Outcomes. (2024). State of practice: The evolution of security risk management in the humanitarian space.
[5] Greenway, L. Joshi, N., Jha, R., Ahimbisibwe, L., & Tanner, L. (2024). Research study: The status of frontline humanitarian workers. Humanitarian Aid International.
[6] Data from the Aid Worker Security Database: https://www.aidworkersecurity.org/
[7] GISF (2024). Neutrality, Access and Making Localisation Work. Global Interagency Security Forum (GISF).

operational constraints tighten, agencies are under pressure to "do more with less," magnifying both the physical and emotional toll on frontline responders.

Q3. What is the FCDO's record of using its diplomatic levers to promote access to aid, protection of aid workers? How might its approach be improved?

11. GISF and its members recognise that the FCDO has long advocated for stronger international mechanisms to protect aid workers and ensure unimpeded aid delivery.

12. The FCDO's support for the adoption of Security Council Resolution 2730, alongside the UN Secretary-General's recommendations to mitigate and respond to incidents, marks a pivotal moment in the ability to enhance the safety and security of aid workers. The Resolution underscores that practical solutions that mitigate and respond to the daily risks aid workers face must be prioritised alongside the promotion of IHL compliance and increasing accountability for violations.[8]

13. In 2019, GISF (then EISF) presented evidence to the UK International Development Committee on funding processes for safety and security of aid workers. DFID's response demonstrated its willingness to learn from the NGO sector by updating the template and guidance for their Rapid Response Facility (which provides bilateral funding to NGOs for humanitarian emergency responses) to include a specific line for security risk management.[9] From a diplomatic perspective, DFID/FCDO 'breaking ground' on this approach encouraged other government donors to follow suit.

14. The practical embedding of safety and security capacities into all mandates issued by the Security Council as recommended by the UN Secretary-General requires renewed close collaboration with humanitarian organisations and specialist entities. The FCDO should invest in and lead a multi-stakeholder initiative to independently monitor the implementation and progress of Resolution 2730's commitments, and provide technical guidance to member states to better support enabling security policy and practices.

15. There is a space in the donor community for leadership on cross-government approaches to improving the operational security of aid workers. The FCDO could convene regular dialogue between member states and global funders (such as the World Bank or pooled fund mechanisms). A critical aspect of this dialogue should be FCDO's advocacy with other donors to consider security risk management as an integral part of delivering aid rather than an administrative or support cost (see response to Q5). By advocating for security to be embedded within funding structures, the FCDO can help drive a systemic shift toward the promotion of safer and more sustainable humanitarian action.

Q4. How has the level of risk for aid workers changed in recent years and where does responsibility for their protection lie? What protections are available and are they adequate?

16. Over the last decade, the humanitarian caseload has expanded in both size and complexity, ushering in proliferating armed factions, blurred frontlines, and unconventional warfare

[8] GISF (2024). Statement by GISF Executive Director on recommendations requested by UN Resolution 2730. Global Interagency Security Forum (GISF).
[9] GISF (2019). An Open Letter to non-governmental and donor organisations from the European Interagency Security Forum; GISF (2019). Reflections on GISF's 'At What Cost?' Campaign. Global Interagency Security Forum (GISF).

tactics (e.g., cyberattacks, disinformation). Aid workers have confronted new and increased threats, including targeted attacks by state or non-state actors using advanced weaponry.[10]

17. Under IHL, conflict parties must respect and protect aid workers, but consistent impunity has undermined these obligations.

18. Beyond IHL, the question of 'where responsibility lies' is an often-overlooked question, and its answer has a strong legislative component. INGOs operating from countries with a 'common law' system (including the United Kingdom, USA, and Australia) operate under what could be termed a 'stricter' focus on legal duty of care to frontline staff, which traces back to the Tort of Negligence. This clarity, however, is lost when you consider the multiple legal jurisdictions an INGO can be operating within at a single moment. Even amongst European nations, those with a civil law system can take very different positions on the duty of care owed by an NGO to its staff.

19. Aid agencies themselves carry a legal duty of care to their personnel, requiring them to implement measures such as security assessments, risk mitigation strategies, and post-incident support. Compliance with these legal obligations, and managing the various requirements of donors, demand significant resources and training, which are often constrained by donor funding. Bridging this gap is essential.

20. GISF is currently concluding a study on the terms and conditions of government funding to NGOs, as they relate to safety and security. A key preliminary finding suggests that in many, if not all its funding mechanisms, FCDO absorbs no risk or liability for the safety and security of NGO staff being funded. While this is in line with many donor governments, there is a question over what incentive there is for FCDO to support aid worker safety and security, beyond goodwill and ensuring project completion. Under current rules, INGOs face challenges in supporting their downstream local NGO partners due to concerns over absorbed liability.

Q5. How could UK ODA funding be made more relevant and accessible to support protection of workers, both local and international?

21. Numerous studies suggest that dedicated budget lines for security and risk management are essential for both international and local organisations.[11] Early survey findings from GISF indicate that organisations are often forced to implement projects without adequate security measures, with two-thirds (66%) of respondents attributing this to donor restrictions on categorising security as a direct cost or to donor-imposed budget ceilings that limit the allocation of sufficient funds for security.[12] Unsurprisingly, operating in highly insecure contexts costs more, and arbitrary percentages of total programme budgets fail to account for the distinct contexts, programmes, and organisational models in each operation. When donors and NGOs continue to treat SRM as a general administrative cost rather than a critical function with its own budget lines, they risk the safe and sustainable delivery of aid and programme continuity.

[10] GISF and Humanitarian Outcomes. (2024). State of practice: The evolution of security risk management in the humanitarian space; Insecurity Insight. (2025). Hovering Threats: The challenges of armed drones in humanitarian contexts.
[11] GISF and Humanitarian Outcomes. (2024). State of practice: The evolution of security risk management in the humanitarian space; GISF (2019). An Open Letter to non-governmental and donor organisations from the European Interagency Security Forum.
[12] GISF (2025). Scoping study on institutional donor grant policies and guidelines regarding safety and security [unpublished survey].

22. To address these challenges, funding mechanisms must explicitly allow for both core and project-specific security costs, with built-in flexibility to adapt to evolving operational landscapes. This should include provisions for capacity strengthening and adaptability to evolving operational contexts. The UK's Rapid Response Facility templates are a promising precedent, but more comprehensive application across all UK ODA funding instruments is necessary.[13]

23. Given that local and national NGOs increasingly deliver aid in highly dangerous or politically sensitive regions, donor support to allocate adequate funding to frontline workforces is critical. While INGOs often act as intermediaries in transferring funds to national and local NGOs, survey findings indicate that nearly two-thirds (62%) of INGO respondents face challenges in allocating security resources to their partners due to donor restrictions or conditions.[14] Donors can champion risk-sharing approaches that foster equitable partnerships and shared responsibility in risk through tweaks to their grant policies and guidance. Providing clarity on allowable security expenses for partners, reviewing compliance requirements related to partner security funding, and collaborating with all implementing partners to better understand their security needs can go a long way in enhancing safe delivery of aid in high-risk environments.[15]

24. In the spirit of collaboration, the UK can go further and lead peer-to-peer learning initiatives with donors on shared experiences, lessons learned, and innovative funding instruments. By exchanging insights on what works, donors can streamline risk-sharing mechanisms, strengthen capacity-building for national and local NGOs, and continually refine ODA funding models to keep pace with evolving security challenges. In addition, creating direct dialogue and feedback mechanisms with aid and development agencies would allow organisations to routinely raise concerns, discuss challenges, and co-create solutions that work with donors.

Q6. Are the levels of support, including psychological support, for those affected by trauma in the delivery of ODA adequate and how could the Government better enable provision of these services?

25. Psychosocial support is often overlooked despite the intense direct and vicarious trauma many aid workers experience. Local staff who reside permanently in war-torn communities are especially vulnerable, enduring repeated incidents of violence, displacement, or threats against family members. Recent surveys reveal that more than a third of frontline workers feel "over-stressed" to the point that it affects their ability to perform their work on a daily or weekly basis.[16] Although several INGOs offer mental health and wellbeing services to staff, these services are not universally available and accessible across the aid sector. In many of the contexts where aid is delivered, these challenges are compounded by cultural stigma around mental health, affecting both the provision and uptake of such services.

26. The UK could improve psychosocial support for aid workers by earmarking funds specifically for staff welfare and mental health within ODA allocations. This could include

[13] GISF (2019). Reflections on GISF's 'At What Cost?' Campaign. Global Interagency Security Forum (GISF).
[14] GISF (2025). Scoping study on institutional donor grant policies and guidelines regarding safety and security [unpublished survey].
[15] GISF (2024). Neutrality, Access and Making Localisation Work. Global Interagency Security Forum (GISF).
[16] Greenway, et al. (2024). Research study: The status of frontline humanitarian workers.

providing flexible, additional funding to enable organisations to offer stress management trainings, provide counselling, or other support mechanism that are both location-specific and culturally appropriate. To ensure the quality and safety of these interventions, funding could also support the development of standards and vetting processes for providers and services. In contexts where stigma or cultural sensitivities hinder uptake, donor support for locally tailored mental health interventions—developed in consultation with community leaders—can foster a more supportive environment for aid workers.

Conclusion

27. The need for secure and unimpeded humanitarian access grows more urgent as today's conflicts escalate in scale, intensity, and complexity. While international frameworks like IHL and Resolution 2730 underscore the importance of protecting aid workers and civilians, real-world implementation continues to lag behind political commitments. Addressing these gaps requires a dual focus: reinforcing accountability for violations while simultaneously supporting practical security risk management measures that allow aid workers to continue delivering vital assistance.

28. By refining funding models to include explicit security and psychosocial support, championing equitable risk-sharing approaches, and fostering multi-stakeholder collaboration around key political instruments, the UK can meaningfully enhance aid worker safety and humanitarian access. Building on existing initiatives and specialist knowledge in security risk management will be critical for turning political commitments into tangible measures that protect aid workers. Ultimately, a more secure humanitarian operating environment not only safeguards aid workers but also ensures that essential services reach populations most in need, upholding the very principles that underpin humanitarian action.

End of Submission