



Foreign, Commonwealth
& Development Office



**Lord (Tariq) Ahmad of Wimbledon
Minister of State (Middle East,
North Africa, South Asia and The
UN)**

**Prime Minister's Special
Representative on Preventing
Sexual Violence in Conflict**

King Charles Street
London
SW1A 2AH

Tel: 0207 008 5000

**Email:
fcdo.correspondence@fcdo.gov.uk**

www.gov.uk/fcdo

Sarah Champion MP, Chair
International Development Committee
House of Commons
London
SW1A 0AA

10 March 2022

Dear Sarah,

**FCDO RESPONSE TO ADDITIONAL QUESTIONS FOLLOWING IDC SESSION ON
WOMEN AND GIRLS IN AFGHANISTAN ON 21 FEBRUARY 2023**

Thank you for your letter of 1 March 2023, in which you requested additional information following the evidence that Andrew McCoubrey and I gave on behalf of FCDO¹ at the International Development Committee (IDC) session held on 21 February 2023 on the situation for women and girls in Afghanistan. This request constituted four questions, which are addressed in turn below.

For opening context, I should say that Afghanistan remains one of the most complex operating environments in the world for the humanitarian and development community. The delivery of aid, engagement with local actors and tracking of impact are all heavily curtailed by both the security situation and deeply entrenched cultural, religious and social structures. The Taliban's edicts on women and girls working for NGOs have compounded the situation.

¹ Throughout this letter 'FCDO' refers to FCDO and its predecessors, DFID and FCO.

“1. Andrew McCoubrey referred to how FCDO had been working on developing a set of principles for the delivery of aid in Afghanistan, which were due to be approved by Ministers “in the coming days”. Can you set out the details of these principles? Have they now received formal approval?”

FCDO has worked with other donors to develop a consistent set of operating principles for humanitarian partners working in Afghanistan. These set out a clear and agreed framework against which humanitarian partners will need to demonstrate how they are aligning. These principles were agreed by donors at an official-level ECHO-convened meeting on 14 February 2023, and have been developed with consultation across the FCDO to ensure that they are institutionally agreed and do not set unintended precedents. The principles include:

- Humanitarian aid can continue where women can meaningfully participate in the assessment of needs, delivery of assistance and monitoring activities.
- Roles filled by women should not simply be replaced by men.
- Support to female NGO staff affected by the ban should continue.
- The need for enhanced monitoring and information on how partners will continue to ensure women can participate in aid delivery, access assistance, have a voice and be protected.

I have been working with the Afghanistan team on formalising the FCDO position on these principles, and on the Taliban edict, and should be in a position to approve them soon. Finally, operating principles for basic service activities, which will be closely aligned to the humanitarian approach as detailed above, are currently being finalised.

“2. What decisions have you taken so far about closing specific programmes in Afghanistan? Can you provide the Committee with a list of UK aid-supported programmes that have been closed or that are facing closure following the ban on women working for NGOs in Afghanistan?”

Due to a reduction in the Afghanistan ODA allocation for 2022-23 from £286m to £246m, we closed projects provided by IRC and Save the Children from the Supporting Afghanistan’s Basic Services programme. Separately, a programming decision was made to close the Early Recovery and Resilience Support Programme with the Norwegian Refugee Council (NRC). However, no programmes have been closed as the result of the Taliban edict on women working for NGOs. Several programmes were initially paused, but have since either partially or fully resumed activities following the establishment of a common international approach of principled pragmatism.

“3. Could you set out why the Government maintains that the UK never funded paramilitary operations in Afghanistan, including any supporting evidence?”

As indicated in the FCDO’s response to the recent ICAI report, our intention through the Law and Order Trust Fund for Afghanistan (LOTFA) had always been to build a civilian policing capability for Afghanistan. However, we acknowledge that over time, and in response to the deteriorating security situation in the country, some elements of the Afghan National Police started to behave in a manner reflective of paramilitaries. Our support through LOTFA was primarily focussed on paying salaries for police officers, and we have set out the mitigations in our response which we sought to put in place to ensure that the funding was not diverted, and human rights concerns were protected. **At no stage did we use LOTFA to pay for specific policing or paramilitary operations.**

“4. You offered to write to us with further details about “specific mitigations” that the Government had put in place in Afghanistan. Please can you set out these details in response to this letter?”

During the ICAI review period (2014-2021), FCDO worked with a range of multilateral, bilateral, private sector, national and international NGO partners. We remain committed to ensuring that all programmes and strategies are subject to rigorous monitoring, evaluation and learning (MEL), and follow risk management processes. This is essential to support our use of evidence, gain sufficient assurances that our programmes are delivering as planned, and learn lessons to maximise results.

FCDO-wide processes. From the start of the review period, DFID introduced due diligence assessments of implementing partners, and launched the Smart Rules, which in 2021 became the Programme Operating Framework (PrOF), to aid programme delivery effectiveness. All FCDO programmes are formally reviewed once a year, in line with the PrOF rules, and monitored through regular progress reports and engagement with implementing partners. DFID also undertook a Supplier Review in 2018, which resulted in a new Supply Partner Code of Conduct, a mandatory Staff Code of Practice, and tougher scrutiny of costs and greater transparency. Finally, in May 2020 DFID created the Due Diligence Hub to support FCDO programme teams to conduct due diligence assessments of our partners.

Reviews and evaluations. In 2014-2021 DFID’s Internal Audit Department (IAD) conducted four reviews, in line with the three-year assurance review cycle. These reviews acknowledged the severe risks of operating in Afghanistan but showed clear improvement in risk management and controls. In the same time period, DFID funded seven independent bilateral programme evaluations, including two independent humanitarian programme evaluations, to assess programme impact. The World Bank-funded Afghanistan Reconstruction Trust Fund (ARTF) was independently evaluated four times in the period 2002-2017 alongside regular evaluations of individual ARTF projects, the most recent of which was in 2021.

Afghanistan-specific controls. All FCDO programmes in Afghanistan use enhanced monitoring tools and a multi-pronged approach to MEL, using robust independent third-party monitoring (TPM), beneficiary feedback, outcome evaluations and lesson learning. All FCDO programmes are managed through guidance specific to Afghanistan, alongside the PrOF. This enables the FCDO to verify that aid is delivered to the intended recipient.

Many of FCDO’s implementing partners have existing TPM contracts, and any that do not will be covered by the new Assurance and Learning Programme (ALP). ALP was established by the FCDO in 2022 to strengthen oversight across the Afghanistan bilateral ODA portfolio. It will provide independent TPM and portfolio MEL, which will monitor risks, help verify whether ODA is reaching intended beneficiaries, and assess performance against strategic objectives.

Programme-specific controls. FCDO was not able to commission evaluations on the LOTFA directly, as it was a UNDP-managed multi-donor trust fund. FCDO was critical of the UNDP MEL approach, commissioned an independent review of it, and was working with donors to address the findings when the programme ended. The ARTF accounted for around 40% of ODA spend, and was administered through the World Bank’s largest TPM contract. Almost all ARTF funds were paid in arrears, and only once their use was confirmed. Any payments made in advance were returned to the World Bank by the Afghan Government if they were misspent. Finally, the majority of FCDO’s humanitarian spend was channelled through the UNOCHA Afghanistan Humanitarian Fund (AHF), which was scrutinised by independent TPM to verify financial transactions and aid delivery to intended recipients.

Current situation. Following the visit of Martin Griffiths (UNOCHA Under-Secretary-General for Humanitarian Affairs and Emergency Relief Coordinator) to Afghanistan in January 2023, the UN Inter-Agency Standing Committee (IASC) has lifted the “pause” in aid. This is replaced by a 6-month trial period governed by an operational framework which partners and donors will use to manage decision-making. The UN is also developing an enhanced monitoring mechanism to ensure that aid continues to be delivered in line with agreed humanitarian principles (see answer to question 1).

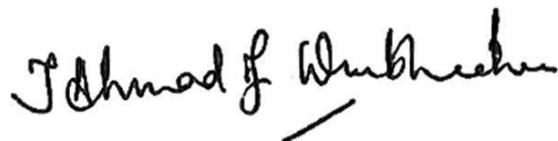
In March 2022 the Foreign Secretary made a commitment that at least 50% of the beneficiaries reached with UK ODA in Afghanistan would be women and girls. FCDO’s humanitarian programmes achieved this by the end of financial year 2021/22, and for 2022/23 we are tracking the target closely with our implementing partners through TPM, progress reports and other assurances. Finally, FCDO established an Afghanistan Operational Excellence (OpEx) team in 2021 to drive improvement in ODA management and implementation. This included quarterly meetings with all major implementing partners covering impact, MEL and other issues. OpEx provides oversight work to review partner reports, particularly on MEL, and provide a quality assurance (QA) role on programme documentation such as due diligence reports to ensure that partners can, and continue to, deliver effectively.

Updated information on hospitals

Finally, during the session on 21 February 2023, Andrew McCoubrey, Acting Director Afghanistan and Pakistan, stated: “Basic services are being provided and women are participating in the provision of those services right the way across the country, both at the basic level and through the ICRC, which is funding around 33 tertiary level hospitals.” He would like to update this point by saying that, according to WHO’s most recent reliably accurate data, around 49 tertiary hospitals now receive support either through ICRC or WHO.

I hope that this provides suitable assurance on these important issues, for you and for your IDC colleagues. Thank you for your support and for the time you and your colleagues have taken to discuss the situation in Afghanistan, a topic about which I care deeply. I and the FCDO remain committed to deliver, with our partners, vital aid across a range of sectors to people in need in Afghanistan.

Yours sincerely,

A handwritten signature in black ink, reading "Tahmad of Wimbledon". The signature is written in a cursive style with a horizontal line underneath the name.

LORD (TARIQ) AHMAD OF WIMBLEDON
Minister of State

Prime Minister’s Special Representative on Preventing Sexual Violence in Conflict