DEFENCE COMMITTEE INQUIRY INTO THE COMPREHENSIVE APPROACH

Perspectives of Non-Governmental Organisations on the Comprehensive Approach

A Paper prepared by the National Audit Office for the Defence Committee, October 2009

1. In Spring 2009 the Defence Committee announced it was undertaking an inquiry into the Comprehensive Approach in which it would examine to what extent UK military and non-military agencies work effectively through a Comprehensive Approach “with commonly understood principles and collaborative processes that enhance the likelihood of favourable and enduring outcomes within a particular situation”.¹

2. To inform its inquiry, the Defence Committee asked the National Audit Office (NAO) to undertake research to identify the views of Non-Governmental Organisations (NGOs) about the Comprehensive Approach. This Paper provides the results of research undertaken by the NAO in June 2009 which included receiving papers from three NGOs, interviewing seven other NGOs and one body responsible for representing NGOs operating in Afghanistan², and summarising the main points made during the interviews.

3. The NAO agreed, with the Defence Committee, the terms of reference for this research, including the range and type of NGOs that were invited to take part and the broad themes that each of the NGOs were asked to address. Appendix A to this Paper sets out the NAO’s methodology (page 20).

4. Each of the NGOs involved in this research is, or has been, operating in one or more countries in conflict. Most of the NGO staff who took part in this research were based in the UK but a number were based in countries currently in conflict. The majority of the UK-based staff had previously operated in countries in conflict.

5. The first part of this Paper provides a summary of the views of the ten NGOs and the NGO representative body (pages 2 to 4). It then discusses in more detail the views of the NGOs and the NGO representative body under ten broad themes (pages 4 to 18). This discussion is supported by Appendices B-K, which provide summaries of the key points arising from each of the interviews the NAO conducted and papers prepared by NGOs (pages 22 onwards). Due to security concerns, one of the NGOs asked not to be identified in this Paper and thus throughout it is referred to as “NGO 10”.

6. The information presented in this Paper is drawn exclusively from the papers submitted by the NGOs, the interviews the NAO held with NGOs and the NGO representative body, and publicly available documents referred to by NGOs during interviews. Neither the research, nor this Paper, has been discussed with the Ministry of Defence (MoD), the Foreign and Commonwealth Office

¹ www.parliament.uk/parliamentary_committees/defence_committee/def090325_no_26.cfm
² In total the NAO held seven meetings. One of the meetings was attended by both an NGO and the body responsible for representing NGO views in Afghanistan.
(FCO), the Department for International Development (DFID) or any other government department. The views contained in this Paper, therefore, are solely those of the NGOs (or their representatives) that contributed to this research.

Views of NGOs - summary

7. NGOs were generally aware of the Comprehensive Approach as a concept and understood the logic behind the UK Government seeking to bring to bear, in a co-ordinated or integrated manner, the range of instruments (e.g. defence, diplomacy and development) at its disposal to achieve an overarching objective. Five NGOs told us they were either not aware of any MoD or UK Government definition or guidance on the Comprehensive Approach or that there appeared to be no shared or common understanding of the term across UK Government (paragraphs 17 to 20).

8. Six NGOs identified a number of potential or actual benefits of the Comprehensive Approach. These include the potential for the Comprehensive Approach to bridge the gap between insecurity and security and thus create a stable environment in which humanitarian and development activities can be conducted. The Comprehensive Approach can also address both the initial stabilisation of a country and the subsequent risk of the country slipping back into conflict (paragraphs 21 to 22).

9. Each of the ten NGOs raised concerns about the effectiveness of the Comprehensive Approach when it is applied to a country in conflict (paragraph 21). NGOs told us that the Comprehensive Approach can:
   - distort aid flows, with resources being moved away from meeting the greatest humanitarian and development needs towards stabilisation activities (paragraph 23);
   - reduce the effectiveness and overall value for money of aid spending (paragraph 24);
   - blur the lines between military and humanitarian organisations. This blurring can impact on the local population’s perceptions of the neutrality, impartiality and independence of NGOs, and thus NGOs’ ability to operate effectively and safely in countries where there is a conflict. Consequently, NGO access to vulnerable and/or remote populations in conflict situations can be hindered (paragraph 25 to 27);
   - increase the militarisation of civilian settings or facilities, such as hospitals, in the host country. For example, the presence of armed private security providers in Afghan hospitals (to protect DFID staff) can turn the facilities, and the Afghan users of those facilities, into targets for belligerents (paragraph 28);
   - result in governments, including their military organisations, undertaking a greater role in the provision of humanitarian assistance. This increased role can be at odds with international guidelines and agreements (for example, authored by the UN) on the provision of humanitarian assistance in general, and the relationship between humanitarian and military actors in particular. Amongst other things, the guidelines and agreements seek to ensure that
differences between humanitarian and military actors are recognised and respected and there is space for humanitarian organisations to operate safely and effectively (paragraphs 29 to 30).

10. These five general concerns about the effectiveness of the Comprehensive Approach are linked, in part, to the view expressed by six NGOs that the UK had not achieved the right balance between the different elements of the Comprehensive Approach. Defence was viewed as being dominant at the expense of development and, to a lesser extent, diplomacy (paragraph 33).

11. NGOs demonstrated different levels of willingness to engage with UK Government on the Comprehensive Approach. Two wanted greater involvement in the planning of particular engagements so they could influence the Comprehensive Approach. One of these NGOs said UK Government should make better use of the NGOs’ local knowledge. Seven other NGOs said they would not engage in the planning of a Comprehensive Approach. Their main reasons for not engaging were a lack of shared objectives with UK Government and the need to maintain their independence, impartiality and neutrality. Two of these seven NGOs did, however, say that they might engage in some co-ordination with UK Government, and three others said they might engage in dialogue with UK Government. One NGO explained that it might work with government to de-conflict their respective activities but would not be part of a fully co-ordinated and regulated approach where parties were working to a single plan. Another NGO said dialogue with government “may be needed at the operational level, strictly provided that it poses no security issue, particularly for beneficiaries and local partners, and that it is necessary to save lives, protect and promote humanitarian principles, avoid competition and minimise inconsistency” (paragraphs 35 to 40).

12. Seven NGOs were clear that they did not wish to engage in the delivery of the Comprehensive Approach, and the three other NGOs did not say whether or not they would engage in delivery (paragraph 41).

13. Five NGOs commented on gaining local ownership of the Comprehensive Approach. In general, these NGOs considered that local ownership was difficult, if not impossible, to achieve as typically the Comprehensive Approach is applied to local people in the host country, and they have limited or no opportunity to influence it. NGOs believed, however, that local people might accept a Comprehensive Approach, but this would require:

- the Comprehensive Approach to address issues which are important to local people. Research undertaken by one NGO shows that in Afghanistan the local people’s priorities are improved governance and establishing the rule of law (paragraphs 44-45);
- UK Government and the wider international community to engage effectively with local people and their representatives (paragraphs 44 to 45).

14. NGOs identified a number of lessons to be learned from the application of the Comprehensive Approach to date. These included lessons for improving the Comprehensive Approach in Afghanistan, for example, by putting Afghan people at the centre of the Comprehensive Approach and by the international community gaining a better understanding of the Afghan people so that it is
better placed to design development and other programmes. There were also more generic lessons, such as political pressure for rapid results being unhelpful and unachievable. One NGO identified the need for caution in seeking to apply lessons from Afghanistan and Iraq to other countries in conflict as there are substantial differences between conflicts, for example, in their causes and nature. The NGO told us that “as UK Government recognises, the Comprehensive Approach can not be a prescribed set of procedures, but must be applied flexibly to reflect the specific circumstances of the conflict. Across most of Whitehall this appears to be accepted conceptually, but there is little evidence of it being operationalised effectively.” Two other NGOs argued that the UK Government and other governments have not evaluated the impact of the Comprehensive Approach in Afghanistan and Iraq in general, or the role of the military in particular (paragraphs 46 to 52).

15. One of the NGOs³ captured comments made to us by many of the NGOs when it concluded that “if the Comprehensive Approach is going to be an effective way of addressing the problems of a country in conflict it needs to:

   • be civilian lead;
   • be operated in way which respects the boundaries and mandates of different organisations;
   • reflect the context of the country where it is being applied, and be based on a good understanding of the local people;
   • support the development objectives of the host country and the priorities of the local people;
   • take account of the range of international governments and international bodies involved in the host country.”

Views of NGOs - by theme

16. The following paragraphs discuss in more detail the points made by the NGOs under the different themes we asked them to address.

Theme 1: From a UK perspective, what does your organisation understand by the term “Comprehensive Approach”? (Theme addressed by nine NGOs)

17. The large majority of NGOs were aware of the Comprehensive Approach as a concept before we contacted them. Two or more NGOs referred to the following key dimensions of the Comprehensive Approach:

   • an integrated, co-ordinated or coherent approach and policy across government and possibly the private sector and NGOs;⁴
   • application of defence (or military), development and diplomatic instruments;⁵
   • focus on a single policy objective or agreed objective(s).⁶

³ British and Irish Agencies Afghanistan Group and Afghan Aid (supporting material included under Theme 3 of the meeting)
⁴ NGOs referring to this dimension were War Child, MSF, British and Irish Agencies Afghanistan Group and Afghan Aid, CARE International UK
⁵ NGOs referring to this dimension were Tearfund, World Vision, Islamic Relief
18. The dimensions of the Comprehensive Approach identified by NGOs were in general reflected in MoD’s extant 2006 joint discussion note on the Comprehensive Approach. 

Theme 2: Has the MoD and/or the UK Government effectively communicated what it understands by the Comprehensive Approach and the merits of such an approach? (Theme addressed by nine NGOs)

19. NGOs have differing views on the adequacy of communication. World Vision was encouraged that MoD’s joint discussion note on the Comprehensive Approach separated “diplomatic, military and economic instruments of power” from an “independent package of developmental and humanitarian activity”. World Vision told us “that this separation, however, has not been maintained on the ground in Afghanistan.” Three of the other NGOs that addressed this theme said that prior to this research they were not aware of any MoD or UK Government definition or guidance on the Comprehensive Approach. Another NGO - British and Irish Agencies Afghanistan Group and Afghan Aid - told us “UK Government has not effectively communicated its understanding of the Comprehensive Approach. In part the absence of communication may reflect the lack of a shared or common understanding across UK Government on the Comprehensive Approach.” A similar point was made by CARE International UK who told us “Different military and government officials maintain quite varied understanding of the term’s definition.”

20. In preparing its paper for this research, War Child identified and reviewed guidance prepared by MoD and the Stabilisation Unit on the Comprehensive Approach. War Child concluded that “Both documents were very limited in terms of communicating the merits of a Comprehensive Approach”. Particular weaknesses identified by War Child included: no example of how the Comprehensive Approach has or might be applied; no consideration of cross-government capability; limited assessment of the challenges to the practical implementation of the Comprehensive Approach; and no consideration of how adopting the Comprehensive Approach will require the buy-in and commitment, as well as capability development, among other nations, not least NATO and EU member states.

Theme 3: Does your organisation see the Comprehensive Approach as an effective way of addressing international crisis? (Theme addressed by ten NGOs)

21. Whilst six NGOs recognised actual or potential benefits to the UK Government of adopting a Comprehensive Approach all ten NGOs raised significant concerns.

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6 NGOs referring to this dimension were MSF, ActionAid
7 Joint Discussion Note 4/05 “The Comprehensive Approach”, January 2006
8 Supporting material included under Theme 1 of the meeting with World Vision
9 Tearfund, Mercy Corps, War Child
10 The FCO website states that “The Foreign Office, Ministry of Defence and Department for International Development jointly own the Stabilisation Unit. The Unit’s role is to support countries emerging from violent conflict through its specialist, targeted and rapid assistance. By creating a ‘stable’ environment, longer term development can begin.” The Units key tasks are: Assessment and planning, deployment into conflict areas and learning lessons. www.fco.gov.uk/en/fco-in-action/conflict/peacekeeping/
about its application to countries in conflict.\textsuperscript{11} NGOs were particularly concerned about how the Comprehensive Approach impacted on:

- the effectiveness of humanitarian and development aid in general;
- the NGOs’ ability to undertake their role safely and effectively; and
- governments’ involvement in providing humanitarian aid.

**Benefits of the Comprehensive Approach**

22. The benefits of the Comprehensive Approach identified by NGOs included:

- co-ordinated activity across defence (military), development and diplomatic arms of government (ActionAid);
- “coherence of government policy is an obvious and important objective” (CARE International UK);
- “creates conditions for a more inclusive consultation of key stakeholders in a way that could make an intervention more responsive to the needs of the civilians on the ground” (War Child);
- “the Comprehensive Approach is a valid experiment to address the political process and bridge the gap between insecurity and security in order to create a stable environment in which to conduct humanitarian aid and development activities” (Tearfund);
- has the potential to address both the initial stabilisation of a country and the subsequent risk of the country slipping back into conflict (World Vision, War Child).

**Impact of the Comprehensive Approach on the effectiveness of humanitarian and development aid in general**

23. The Comprehensive Approach can distort aid flows away from meeting the greatest humanitarian and development needs. Tearfund told us that “the close coordination of development objectives and strategies with military and diplomatic ones should not be limited to those areas or populations which are foreign policy priorities for the MoD or FCO”. Four NGOs told us, however, that in practice an increasing amount of UK aid in Afghanistan is being used in Helmand to assist with stabilisation rather than being distributed according to need.\textsuperscript{12}

24. The Comprehensive Approach may reduce the effectiveness and overall value for money of aid spending. In commenting on Afghanistan, NGO 10 argued that “Hearts and Minds projects do not work and do not deter insurgency attacks”. It told us that:

\textsuperscript{11} The six NGOs recognising actual or potential benefits were World Vision, War Child, Tearfund, ActionAid, CARE International UK and British and Irish Agencies Afghanistan Group and Afghan Aid

\textsuperscript{12} ActionAid, World Vision, NGO 10, British and Irish Agencies Afghanistan Group and Afghan Aid (supporting material included under Theme 10 of the meeting with British and Irish Agencies Afghanistan Group and Afghan Aid)
“Individual quick impact development projects often do not address key development challenges. Moreover, with full consideration given to the particular history and context of Afghanistan (especially the south and south-east), namely, the history of foreign military interference, persistent poverty and unemployment, corrupt and unjust government, excessive use of force by international military forces, widespread illiteracy, Islamist propaganda, and the systematic use of terror and intimidation by militants, it is clear that limited assistance projects will have little impact on support for, or engagement in, insurgent activity.”

Mercy Corps told us that “It does not consider that Provincial Reconstruction Teams (PRTs) are the right approach for delivering humanitarian and development assistance and views them as inappropriate and ineffective.”

Mercy Corps concerns included:

- “Communities want long-term development assistance based on transparency, accountability and local ownership. Such approaches are not compatible with the short-term imperatives which drive the military’s stabilisation strategy. The military’s use of often costly, ineffective and unaccountable implementing partners is also highly problematic”;
- “PRTs do not distribute humanitarian assistance within Afghanistan according to need”;
- “PRTs are not a cost effective mechanism for delivering humanitarian or development aid. For example, PRT staff undertaking humanitarian or development activities are often escorted by armed personnel which increases cost and can reduce the willingness of Afghans to take-up the assistance provided”.

Impact of the Comprehensive Approach on NGOs’ ability to undertake their role safely and effectively.

25. The Comprehensive Approach can blur the lines between military and humanitarian organisations, impacting on local people’s perceptions of the neutrality, impartiality and independence of NGOs and thus their ability to operate effectively and safely. Consequently, the Comprehensive Approach can hinder NGO access to vulnerable and/or remote populations in conflict situations. Between them, eight NGOs provided a range of examples of how the Comprehensive Approach could put their independence and impartiality at risk, including:

- if an NGO is seen to be engaging with overseas governments involved in a country where there is conflict;

13 The FCO website says the “Provincial Reconstruction Teams (PRTs) are at the heart of the International Security Assistance Force (ISAF) mission and embody a joint military and civilian approach to stabilising Afghanistan. They are a combination of international military and civilian personnel based in provincial areas of the country extending the authority of the Afghan Government, supporting reform of the security sector, and facilitating development and reconstruction. Each is tailored to the prevailing security situation, socio-economic conditions, terrain, and reach of the central government.”


14 War Child, Mercy Corps, MSF, Tearfund, NGO 10, CARE International UK, British and Irish Agencies Afghanistan Group and Afghan Aid, Islamic Relief
by the engagement of other NGOs with an overseas government as local people may see NGOs as a homogenous group;

by direct overseas government provision of aid, for example through the Provincial Reconstruction Teams in Afghanistan, as local people may not distinguish between the Teams and humanitarian agencies.

Thus the direct or indirect involvement of UK Government and other governments in providing aid could reduce the scope, in both the short run and long run, for independent NGOs to operate in a country without putting their staff at unacceptable levels of risk. MSF told us that:

“in Iraq humanitarian NGOs were seen by many as part of the wider western military effort and were presented by the US military as such. This false representation of humanitarian action as part of the military effort increased the security risks faced by NGO staff operating in the field and, as a result, MSF and many other humanitarian NGOs withdrew from Iraq. If MSF, and similar organisations, are squeezed out by the Comprehensive Approach, the population is deprived of life-saving assistance in its hour of greatest need. As an alternative the military will undertake relief activities, not only for altruistic purposes but also for the benefits of hearts and minds, but only in the areas under their direct control, which may result in large numbers of the civilian population receiving no support. And a withdrawal of NGOs will only increase the length of time that the military needs to undertake this direct provision of relief.”

Tearfund supported MSF’s position. It told us that “it is imperative that the proponents of the Comprehensive Approach do not see NGOs as ‘force multipliers’ of HMG’s strategy in conflict areas.”

NGOs referred to specific instances where their field staff had been threatened, attacked, kidnapped or killed. CARE International UK explained that “Our commitment to humanitarian principles is not inspired by abstract theory, but rather our need to ensure the safety and security of field staff, partners and beneficiaries.”

CARE International UK also told us that NGOs’ operations and safety are also threatened by the priority given to military interests on the ground. It said:

“NGOs maintain serious concerns about potential impacts of Comprehensive Approach implementation for their operations, and the safety of their staff and beneficiaries. At field level, experience of military operations in Afghanistan suggests that international forces will continue to assert a military pre-eminence in hostile environments in which they are conducting combat operations. This partly reflects both the level of authority delegated to the force commander in-theatre, and the imbalanced spread of resources between military and civilian actors involved. Such an approach threatens the space for NGOs or other agencies to deliver independent, neutral and impartial humanitarian assistance.”

MSF told us “that the Comprehensive Approach can increase the militarisation of civilian settings or facilities, such as hospitals, in the host country. Many armed private security providers are being used to protect DFID staff working in Afghanistan. The presence of armed security providers in civilian facilities can
turn the facilities, and the Afghan users of those facilities, into targets for belligerents. In Afghanistan, the UK Government has described armed private security providers as armed civilians, which risks militarising the ‘civilian status’. Under the Geneva Convention civilians are individuals who take no part in hostilities.”

**Impact of the Comprehensive Approach on governments’ involvement in providing humanitarian aid**

29. Three NGOs raised general points of principle regarding governments providing humanitarian aid. Mercy Corps said that “Humanitarian action is not an instrument of conflict resolution or crisis management or a tool for fighting terrorism as established clearly in the European Consensus on Humanitarian Aid”. War Child said that:

> “International Humanitarian Law dictates that humanitarian assistance, which is currently seen as an element of the Comprehensive Approach, should be given regardless of the political affiliation of a person, their ethnicity, religion and so on ……… If humanitarian action is sourced in a “whole government” owned strategy and subsequently delivered through a Comprehensive Approach then it is not impartial. Consequently, the humanitarian delivery agents will not be perceived to be neutral within a conflict or post-conflict situation.”

War Child also told us that “Humanitarian assistance delivered through a Comprehensive Approach diverts funds away from the established humanitarian aid architecture.” World Vision told us that “The UK’s application of the Comprehensive Approach in Afghanistan has not followed the concepts set down in MoD guidance. The split between “diplomatic, military and economic instruments of power” and an “independent package of developmental and humanitarian activity” has not been maintained. Aid has been used to achieve stabilisation objectives.”

30. NGO 10 and British and Irish Agencies Afghanistan Group and Afghan Aid raised specific concerns about the military not respecting the independence and mandate of humanitarian organisations in Afghanistan. They both referred to the 2008 “Guidelines for the Interaction and Coordination of Humanitarian Actors and Military Actors in Afghanistan”. NGO 10 said:

> “These Guidelines, which amongst others have been signed by the United Nations Assistance Mission and the International Security Assistance Force, state that the use of ‘military assets’ for ‘humanitarian relief operations’ should only be used if a number of conditions are met including:

  - ‘there is no comparable civilian alternative’;
  - ‘to the extent possible there is civilian control over the operation’;

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16 Supporting material included under Theme 6 of the meeting with NGO 10
‘military assets (used for humanitarian relief operations) are clearly distinguished from those used for military purposes’.

In a number of areas, the military have undertaken development or humanitarian operations where there are civilian alternatives.”

Theme 4: Has the MoD and/or UK Government worked effectively with the international community to adopt a Comprehensive Approach? (Theme addressed by eight NGOs)

31. The NGOs that addressed this question, raised a range of points:

- There were different views on whether the international community had worked well to adopt a Comprehensive Approach in Afghanistan. ActionAid told us that “In Afghanistan, the UK Government has worked effectively with other donor countries, the UN and NATO in adopting a Comprehensive Approach”. British and Irish Agencies Afghanistan Group and Afghan Aid said that the UK had “sought to bring the US round to the UK’s way of thinking on the Comprehensive Approach, which has been helpful”. However, it also said that “currently different actors and countries are coming to Afghanistan with their different approaches. Ideally, all actors should come together to achieve the objectives of the host government and people under the oversight of a single body, such as the UN”;

- NGO 10 and British and Irish Agencies Afghanistan Group and Afghan Aid told us that there was inadequate liaison between international governments which increases the burden on the Afghan government of interacting with donors;

- On a related point, Islamic Relief commented on the capacity of the Afghan government to manage the aid it was receiving. It said “in line with the Afghan government’s wishes, the UK Government and other donors have increasingly moved funding away from projects to the multi-donor funded National Solidarity Programme. This change has the potential to increase the credibility of the Afghan Government. However, insufficient resources have been available to administer these large flows of aid and ensure they are well spent and effective, and that local delivery mechanisms do not become corrupt”;

- CARE International UK and NGO 10 commented that the UK Government should do more to improve the capability of the UN. CARE International UK told us “UK approaches to the Comprehensive Approach are highly influenced by wider international efforts. For this reason, DFID should invest in strengthening UN humanitarian leadership and coordination structures, in particular, UN OCHA [Office for the Coordination of Humanitarian Affairs]. At present, UN OCHA is frequently constrained by inadequate human resources and political backing to effectively engage in coordination with political and military actors on an equal and independent footing”.

17 The National Solidarity Programme is funded by a number of donors and is managed by the Afghan Government
Theme 5: Has the MoD and/or the UK Government built the UK’s capacity to engage in a Comprehensive Approach to a crisis? What more could be done? (Theme addressed by seven NGOs)

32. Two of the NGOs addressing this question referred to the establishment of the Stabilisation Unit (formerly the Post Conflict Reconstruction Unit). World Vision said that “to date (the Stabilisation Unit) has primarily focused on Iraq and Afghanistan, thus reducing the UK’s ability to contribute to other stabilisation activities where it has potential important influence.” World Vision also noted positively that the UK Government was raising the civilian capacity of the Stabilisation Unit by increasing the number of civilian experts it could call upon. Tearfund commented, however, “that the aims of these posts seem very foreign policy and military-led as opposed to being led by the development needs of the population affected.”

33. Six of the NGOs which addressed this theme were concerned that the UK had not achieved the right balance between defence, diplomacy and development in applying the Comprehensive Approach. The NGOs told us that:

- the application of the Comprehensive Approach in Afghanistan had “placed too much emphasis on defence, with diplomacy and development being subordinated” (ActionAid);
- “UK Government effort [in Afghanistan] needs to be co-ordinated in a way which does not subordiate the role of development” (NGO 10);19
- the majority of funding DFID directly manages in Afghanistan “is now used by DFID for projects in Helmand which are supporting the military intervention. By focusing the aid it directly manages on a single province, DFID is going against its general principle that aid should be distributed according to need, with the aim of reducing poverty.”21 The increasing focus on Helmand has also “reduced the amount of UK funding available for NGOs working elsewhere in Afghanistan” and led to the cancellation of some successful projects (British and Irish Agencies Afghanistan Group and Afghan Aid);
- “the UK Government should ensure that development of the Comprehensive Approach respects the distinct mandate and priorities of the Department for International Development (DFID); in particular in relation to humanitarian action” (CARE International UK).

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18 CARE International UK, British and Irish Agencies Afghanistan Group and Afghan Aid (supporting material included under overview and context section and Theme 10 of the meeting with British and Irish Agencies Afghanistan Group and Afghan Aid), NGO 10 (supporting material included under Theme 10 of the meeting with NGO 10), War Child, World Vision, ActionAid (supporting material included under Theme 3 of the meeting with ActionAid)
19 Supporting material included under Theme 10 of the meeting with NGO 10
20 British and Irish Agencies Afghanistan Group and Afghan Aid told us that in Afghanistan, DFID’s aid is used in two ways. A high proportion of DFID’s aid - around 80 per cent - goes through multi-donor trust funds. The remaining 20 per cent is directly managed by DFID. Multi-donor trust funds are supported by a number of donors and are managed by the Afghan Government.
21 The increasing focus on Helmand was also identified by other NGOs see paragraph 23
34. At a policy level, NGOs saw the UK Government as wishing to have a dialogue with NGOs on aid issues in general, and the Comprehensive Approach in particular. This was welcomed by NGOs, but four mentioned that NGOs’ ability to engage was limited by their resources. NGO umbrella groups find it difficult to raise funds to engage in policy work. The four NGOs told us that if UK Government wants an intelligent debate with NGOs on the Comprehensive Approach it may need to support them to do so. One of these four, CARE International UK, recommended:

“The UK Government should invest in NGO capacities and mechanisms to enable effective and appropriate NGO engagement in policy dialogue on issues related to the Comprehensive Approach; trainings and exercises with the military to sensitise them to humanitarian principles; and programmatic learning on effective NGO approaches to civil-military interaction at field level.”

Theme 6: What are the challenges faced by NGOs in engaging in the planning of a Comprehensive Approach to a particular crisis? How might the MoD/UK Government assist NGOs in addressing these challenges? (Theme addressed by ten NGOs)

35. NGOs demonstrated different levels of willingness to engage with UK Government in the planning of a Comprehensive Approach.

36. Two NGOs identified potential benefits from greater involvement of NGOs in the planning of particular engagements so they could influence the Comprehensive Approach. ActionAid told us that there should be regular meetings with UK Government in Afghanistan so that NGOs could “engage in planning and in-country decision making, and provide feedback including constructive criticism.” ActionAid argued that “NGOs have a much better understanding of the Afghan people, and UK Government should make better use of NGOs’ local knowledge.” Tearfund told us, that to maintain NGO independence, “the most appropriate route for NGOs to engage with the planning of the Comprehensive Approach would be through DFID. [But] There has to date been little outreach from DFID to NGOs regarding this.”

37. Seven NGOs told us they would not engage in the planning of a Comprehensive Approach. The main reasons for not engaging were a lack of shared objectives with UK Government and the need to maintain their independence, impartiality and neutrality. Commenting on the lack of shared objectives, MSF explained that “The UK Government wishes to resolve conflict in a way which best suits the interests of the UK. MSF does not share that objective and maintains its complete independence from it, wishing only to provide impartial humanitarian assistance to civilians caught up in a conflict situation regardless of which side of a frontline they may reside.”

38. Two of the NGOs (World Vision and British and Irish Agencies Afghanistan Group and Afghan Aid), who said that they would not engage in the planning of a

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22 British and Irish Agencies Afghanistan Group and Afghan Aid, Islamic Relief, CARE International UK, World Vision (supporting material included under Theme 6 of the meeting with World Vision)
23 MSF, World Vision, British and Irish Agencies Afghanistan Group and Afghan Aid, Mercy Corps, NGO 10, Islamic Relief, CARE International UK
Comprehensive Approach, said that they might engage in co-ordination. World Vision identified two broad ways of operating the Comprehensive Approach:

- a fully co-ordinated and regulated activity with all parties working to a single plan;
- more limited co-ordination to ensure that the activities of different agencies do not conflict.

World Vision told us “MoD and other military organisations may prefer the former, but World Vision would not be part of a fully co-ordinated approach. World Vision can however work with military organisations to de-conflict separate activities so that they do not work against each other or duplicate each other.” World Vision had developed a tool “to assist its staff to think through difficult operational and policy decisions they may face when interacting with military actors. The tool identifies that there is a spectrum of possible interactions between humanitarian and military operations, ranging from a humanitarian NGO curtailing its presence, through co-existence, co-ordination to co-operation.” World Vision sees an opportunity for the NGO community to work together to strengthen and develop standard rules for engaging with the military. It told us, however, that such development work was likely to require funding from government or international sources and additional support to the often marginalised Civil-Military Coordination Section within the UN Office for the Coordination of Humanitarian Affairs.24

39. Another three of the NGOs, that said that they would not engage in the planning of a Comprehensive Approach, told us that they had or might have dialogue with governments with regard to a particular situation.25 One of these, Mercy Corps, said that:

“Humanitarian workers and programmes may be placed at risk if local populations, or warring parties, perceive ties between military and humanitarian workers, Mercy Corps believes that coordination between humanitarian actors and military/combatant should be avoided. Yet, dialogue may be needed at the operational level, strictly provided that it poses no security issue, particularly for beneficiaries and local partners, and that it is necessary to save lives, protect and promote humanitarian principles, avoid competition and minimise inconsistency.”

CARE International UK summarised its position on relations between UK Government and NGOs and concluded that:

“The UK Government should respect the non-governmental and independent character of civil society and specifically NGOs involved in humanitarian assistance in conflict-affected contexts. For this reason, it should not seek to incorporate NGOs into a Comprehensive Approach framework, but rather identify means to enable appropriate and effective dialogue with NGOs on related policy and operational issues.”

24 This paragraph draws on material included in the following three parts of the meeting with World Vision: Theme 2, Theme 6 and the overview and context section.
25 Mercy Corps, Islamic Relief, CARE International UK
40. World Vision and Islamic Relief identified that the long-term nature of the development agenda can be at odds with the shorter term focus of some in government. World Vision stated the “horizons of different government and non-government agencies can make it difficult to establish a common long term plan which both addresses stabilisation and tackles the longer term risk that a country slips back into conflict. For example, diplomats focus on short term opportunities, the military often have a two to three year horizon, whilst government aid agencies and development NGOs are often focused on a 10 year development agenda.” Islamic Relief gave a specific example. It said “encouraging Afghans to grow alternative crops to poppies requires a long term commitment of ten years or more. But aid agencies may only provide funding for short projects and there are risks that projects do not get renewed, for example, because there is a change in political leadership of the agency, or the agency decides to channel its money through a multi-donor pool (e.g. the National Solidarity Programme in Afghanistan) rather than use it to fund its own projects.”

Theme 7: What are the challenges faced by NGOs in engaging in the delivery of a Comprehensive Approach to a particular crisis? How might MoD/UK Government assist NGOs in addressing these challenges? (Theme addressed by ten NGOs)

41. Seven NGOs were clear that they did not wish to engage in the delivery of the Comprehensive Approach. The other three NGOs did not say whether or not they would engage in delivery.

42. The reasons given by the seven NGOs (who were clear they would not engage in delivery of the Comprehensive Approach) generally repeated points made previously, such as the lack of shared objectives with the UK Government and the risks to NGO independence, impartiality and neutrality (see paragraph 37). The NGOs did, however, make some additional points regarding the challenges they might face working in environments which had adopted a Comprehensive Approach:

- There can be tension between governments wishing to demonstrate the positive results of development or humanitarian activities they have supported and the need for NGOs to maintain their independence. Tearfund and Islamic Relief raised this point, with Tearfund telling us that:

  “Whether or not HMG (Her Majesty’s Government) considers increased political stabilisation to be a de facto result of humanitarian NGO work (for example through improved health, food security, or income in a given area), that work should never be made a component of an explicit “hearts and minds” campaign, in which infrastructure or other benefits are explicitly claimed as an achievement by one of the parties to the conflict. HMG can assist NGOs by recognizing this differentiation and adopting a low profile approach to monitoring and publicizing NGO projects in conflict areas.”

26 MSF, Mercy Corps, World Vision, NGO 10, British and Irish Agencies Afghanistan Group and Afghan Aid, Islamic Relief, CARE International UK
NGOs are not always able to operate in areas the military think they should do. British and Irish Agencies Afghanistan Group and Afghan Aid, which does not engage in the delivery of the Comprehensive Approach, explained that “if a location is being ‘held’ by the military it does not mean that it is safe for unarmed NGO staff to start to deliver programmes in what may well be an unfamiliar setting.”

**Theme 8: What are the challenges faced in moving between different stages of a Comprehensive Approach, for example from stabilisation to reconstruction? (Theme addressed by six NGOs)**

43. Theme 8 proved difficult for NGOs to respond to. Four did not address the theme at all. Two said it was difficult to comment on the challenges faced in moving between different stages of the Comprehensive Approach either because they did not engage in the Comprehensive Approach (MSF) or because those outside UK government have not been made fully aware of the different stages (Tearfund). Three NGOs told us that a conflict may not pass through distinct stages or there may be overlap between those stages.

**Theme 9: How can local ownership for a Comprehensive Approach be established? (Theme addressed by five NGOs)**

44. The consensus of the five NGOs that answered this question was that local ownership was difficult to achieve. The Comprehensive Approach was typically applied to local people in the host country, and they had limited or no opportunity to influence it. ActionAid told us that in Afghanistan “Neither the Afghan people, nor their elected representatives (the members of the Afghan parliament), have been directly consulted about the Comprehensive Approach.” World Vision said that “Local ownership is very difficult, if not impossible, where the Comprehensive Approach is conceived of, developed and introduced from the outside by the international community rather than by representatives within the host country.”

45. Three NGOs referred to local acceptance rather than local ownership of the Comprehensive Approach. Local acceptance is possible but it would require:

- the Comprehensive Approach to address issues which are important to local people. British and Irish Agencies Afghanistan Group and Afghan Aid told us that its “sponsored research identified that, whilst development is important, the priorities of the Afghan people are improved governance and establishing the rule of law.” The NGO told us that neither of these priorities were being delivered currently;
- UK Government and the international community to engage more effectively with local people and their representatives. Three NGOs identified that better engagement would help.

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27 ActionAid, CARE International UK, NGO 10, Islamic Relief
28 Mercy Corps, World Vision, British and Irish Agencies Afghanistan Group and Afghan Aid
29 ActionAid, British and Irish Agencies Afghanistan Group and Afghan Aid, World Vision, Tearfund, War Child
30 World Vision, British and Irish Agencies Afghanistan Group and Afghan Aid, ActionAid
31 War Child, ActionAid, British and Irish Agencies Afghanistan Group and Afghan Aid
however, that “dialogue and planning can in fact put local people at risk of attack by those resisting the presence of the international community.” NGO 10 told us that “excessive use of force by foreign military forces in air-strikes and house-raids, especially by the US in the early days, continues to undermine the Afghan people’s support for the international presence in their country”. 32

Theme 10: What lessons have been learnt from the application of the Comprehensive Approach in Iraq, Afghanistan or other countries? (Theme addressed by ten NGOs)

46. This question elicited a range of responses from NGOs, with some emphasising points they had made to previous questions, such as the risk that the Comprehensive Approach can make it more difficult for humanitarian NGOs to operate effectively and safely. The additional points raised by NGOs fell into two main categories.

Lessons for developing the Comprehensive Approach in Afghanistan

47. ActionAid told us that “The Afghan people need to be put at the centre of the Comprehensive Approach. The current focus on security and wider geo-political objectives will not benefit the Afghan people in the long run.” This view was consistent with the position of NGO 10 which identified the following five actions that were required to improve development and stability in Afghanistan:

- “The International community must make a sincere commitment to state building”;
- “Additional support is needed for agriculture” as around 80 per cent of Afghans depend on agriculture, and connected occupations and trades;
- “The international community needs to build the capability and professionalism of the Afghan security forces”;
- “Overseas military forces need to change their emphasis. Rather than tracking down insurgents, the overriding objective of military forces should be protecting local Afghans so that they can get on with their lives”;
- “The international community must get a much better understanding of the Afghan people so that it is better placed to design development and other programmes”.

48. Three NGOs told us that experience to date has demonstrated that short term “hearts and minds” approaches do not work but one NGO said that in some regions of Afghanistan there was some evidence that the work of Provincial Reconstruction Teams (PRTs) was welcomed by local people. CARE International UK said that “‘lessons identified’, if not ‘lessons learned’, emerging from Iraq and Afghanistan have underlined the ineffective nature of short-termist and military-dominated approaches to stabilisation and reconstruction efforts in such contexts.” British and Irish Agencies Afghanistan Group and Afghan Aid said that research it had sponsored in Afghanistan “shows that the “hearts and minds” philosophy and projects do not work as they do not

32 Supporting material included under Theme 3 of the meeting with NGO 10
address the priorities of local people.” NGO 10 commented on the performance of PRTs in Afghanistan which it sees as operating along the lines of the Comprehensive Approach. It told us that it was “not aware of any PRT that has brought greater stability to its province”.33 World Vision, however, told us that “amongst the Afghan people there are different views of the Provincial Reconstruction Teams. There is, for example, anecdotal evidence that the local people’s perspectives of the PRTs operating in Western Afghanistan are relatively favourable and local people have been reported as being frustrated with PRTs for not undertaking enough development work.”

49. In summarising its position British and Irish Agencies Afghanistan Group and Afghan Aid told us that “Afghanistan is a very difficult operating environment and all organisations, whether government or NGOs, will make mistakes. There is a need for different actors engaged in Afghanistan to understand each other better and support each other more”.34

Lessons for developing the Comprehensive Approach more generally

50. NGO 10 raised a question “over whether the Comprehensive Approach is wrong in principle, or whether the wrong policies have been used to implement the Comprehensive Approach in practice”. It went on to identify that:

- “there can be tension between who should take credit for improvements made, for example, in security and development in the host country when a Comprehensive Approach is adopted. For example, if the international community in Afghanistan takes credit for development work this can help bolster its support amongst Afghans and the populations of donor and troop contributing countries. However, this would do little to provide the Afghan government with greater legitimacy, which is a necessary condition for conferring legitimacy on the international forces in the eyes of many Afghans”;

- “the Cabinet Office may not have the capacity or expertise to undertake their role of co-ordinating UK Government activity as effectively as is required”;

- “there can be political pressure for rapid results which can be unhelpful and unachievable”.

51. World Vision identified the need for caution “in seeking to apply lessons from Afghanistan and Iraq to other countries in conflict. There are substantial differences between conflicts, for example, in their causes and nature. As UK Government recognises, the Comprehensive Approach can not be a prescribed set of procedures, but must be applied flexibly to reflect the specific circumstances of the conflict. Across most of Whitehall this appears to be accepted conceptually, but there is little evidence of this being operationalised effectively.”

33 This quote is taken from the overview and context section of the meeting with NGO 10
34 This material is taken from the overview and context section of the meeting with British and Irish Agencies Afghanistan Group and Afghan Aid
52. Two NGOs argued that there have been weaknesses in evaluation. Islamic Relief said “the UK Government and other governments are now focusing on what should be done to rebuild Iraq and Afghanistan. They are not looking to evaluate how their interventions have impacted on:

- the humanitarian and development agendas. Would the sums spent by the West on military action have delivered better outcomes if the money had instead been used for humanitarian and development programmes in Afghanistan and Iraq;
- the safety of the people in the West.”

War Child argued more generally that “whenever military actors are involved in the delivery of humanitarian assistance, very little effort is made to learn and evaluate effectiveness”. This NGO also told us that “neither the MoD nor any other element of the UK Government in Afghanistan has sought to monitor the excess mortality of Afghan civilians …… , nor has this been championed as a necessity to ensure informed policy and decision making within the delivery of a Comprehensive Approach in Afghanistan”. It recommended that “a genuinely independent monitoring and evaluation capability must be established to evaluate and bear witness to the effects of military actions on civilians and the delivery of humanitarian assistance (directly or indirectly) within a Comprehensive Approach.”
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Appendix A: Methodology

Selection of NGOs to include in this research

1. We agreed with the staff of the Defence Committee that we would aim to get views from a cross section of NGOs, including large and small NGOs, humanitarian and development NGOs, UK and international NGOs, faith based NGOs and NGOs representing different population groups, such as children. The ten organisations that contributed to this research (see list on previous page) provide a good cross section of NGOs. In addition to the ten NGOs we also spoke to the British and Irish Agencies Afghanistan Group, which is an umbrella group covering 26 NGOs.

Themes covered with NGOs

2. After consulting the staff of the Defence Committee, the NAO established ten broad themes to explore with NGOs (see next page). In addition to the themes, NGOs were given the opportunity to raise any other matters they wished regarding the Comprehensive Approach.

Meetings with NGOs and papers provided by NGOs

3. NGOs were given the option of providing their views by submitting a paper or meeting NAO staff. Three NGOs provided papers. Seven NGOs held meetings with the NAO. NAO staff prepared summaries of those seven meetings. The summaries were then provided to the NGOs for agreement. The meeting with one NGO was also attended by the British and Irish Agencies Afghanistan Group and both organisations have been asked to agree the summary.

4. Two of the papers and all of the summaries of meetings have been organised around the 10 broad themes identified by the NAO. The paper submitted by one NGO was provided in a different structure but it addressed the majority of the themes raised by the NAO.

Presentation of NGO views

5. The NAO’s analysis of NGO views (pages 2 to 18) was based solely on the papers submitted by NGOs, the interviews NAO held with NGOs and the NGO representative body, and publicly available documents referred to by NGOs during interviews.

Timing

6. NGOs provided papers, or met the NAO, in June 2009. At the end of June 2009 the NAO prepared a draft of this Paper which was shared with the Committee (with all references to NGOs anonymised). The draft Paper was also shared with NGOs and changes were made to reflect the comments they made.
The ten themes NGOs were asked to address

I. From a UK-perspective, what does your organisation understand by the term the “Comprehensive Approach”?

II. Has the MoD and/or the UK Government effectively communicated what it understands by the Comprehensive Approach and the merits of such an approach?

III. Does your organisation see the Comprehensive Approach as an effective way of addressing international crises?

IV. Has the MoD and/or the UK Government worked effectively with the international community to adopt a Comprehensive Approach?

V. Has the MoD and/or the UK Government built the UK’s capacity to engage in a Comprehensive Approach to a crisis? What more could be done?

VI. What are the challenges faced by NGOs in engaging in the planning of a Comprehensive Approach to a particular crisis? How might the MoD/UK Government assist NGOs in addressing these challenges?

VII. What are the challenges faced by NGOs in engaging in the delivery of a Comprehensive Approach to a particular crisis? How might MoD/UK Government assist NGOs in addressing these challenges?

VIII. What are the challenges faced in moving between different stages of a Comprehensive Approach, for example from stabilisation to reconstruction?

IX. How can local ownership for a Comprehensive Approach be established?

X. What lessons have been learnt from the application of the Comprehensive Approach in Iraq, Afghanistan or other countries?
Appendix B: Action Aid

NAO summary of meeting with a representative of ActionAid 10th June 2009

Present from ActionAid:

Mudasser Hussain Siddiqui - Manager - Policy Advocacy and Research, based in Kabul

Overview and context

ActionAid considers that, in principle, the Comprehensive Approach could be an effective way of tackling crises, but it has not been applied successfully in Afghanistan. The Comprehensive Approach followed by the UK Government and the international community in Afghanistan has focused on security and wider geo-political objectives, rather than meeting the needs of the Afghan people. The UK Government has not treated NGOs as an equal partner. NGOs have not been involved in planning the Comprehensive Approach and, as a consequence, UK Government has not benefited from NGO’s knowledge and understanding of the Afghan people.

ActionAid has been operating in Afghanistan since 2002. It initially operated in the north and now also has a presence in Kandahar, Bamiyan and Kabul. ActionAid is currently undertaking a wide range of projects in Afghanistan which, for example, address Women Rights, Disaster Management, Food Security and HIV/AIDS. ActionAid also does research and advocacy work. ActionAid’s work is funded in a number of ways. For example, it currently receives funding from several Ministries of the Afghan Government who themselves are supported by the Afghanistan Reconstruction Trust Fund35. In the past, ActionAid has run projects in Afghanistan which have been funded by the UK Foreign and Commonwealth Office. ActionAid also has individual supporters in UK who make a small monthly contribution towards its work.

Theme 1. From a UK perspective, what does your organisation understand by the term “Comprehensive Approach”?

ActionAid understands that the Comprehensive Approach involves the international community in general, and donor countries in particular, intervening in a host country using defence, diplomacy and development (the 3Ds) to achieve a commonly agreed objective.

35 Afghanistan Reconstruction Trust Fund is funded by international donors such as the UK Government and is administered by the World Bank
ActionAid also understands that UK Government and other governments want to include NGOs within the Comprehensive Approach. To date, however, NGOs have been treated by the UK Government as “contractors” rather than organisations to be involved in decision making.

Theme 2. Has the MoD and/or the UK Government effectively communicated what it understands by the Comprehensive Approach and the merits of such an approach?
UK Government has not effectively communicated its view of the Comprehensive Approach to ActionAid.

Theme 3. Does your organisation see the Comprehensive Approach as an effective way of addressing international crisis?
ActionAid understands why the UK Government and international community wish to adopt a Comprehensive Approach. And, in principle, ActionAid believes the Comprehensive Approach - with its emphasis on co-ordinating the efforts of different actors - could be an effective way of addressing an international crisis. However, ActionAid does not believe the application of the Comprehensive Approach in Afghanistan has been successful as it has:

- been too focused on security and wider geo-political objectives. The interests of the Afghan people have been secondary to stabilisation and combating the insurgency;
- placed too much emphasis on defence, with diplomacy and development being subordinated. For example, increasing amounts of UK aid are being allocated to Helmand rather than being distributed according to need.

Theme 4. Has the MoD and/or UK Government worked effectively with the international community to adopt a Comprehensive Approach?
In Afghanistan, the UK Government has worked effectively with other donor countries, the UN and NATO in adopting a Comprehensive Approach. However, the UK Government has not worked effectively with other interested parties, such as NGOs. (see Theme 6)

Theme 5. Has the MoD and/or the UK Government built the UK’s capacity to engage in a Comprehensive Approach to a crisis? What more could be done?
ActionAid is not in a position to comment on this question.
Theme 6. What are the challenges faced by NGOs in engaging in the planning of a Comprehensive Approach to a particular crisis? How might the MoD/UK Government assist NGOs in addressing these challenges?

NGOs have not been given sufficient opportunity to be involved in the planning of the Comprehensive Approach in Afghanistan. The UK’s NGO-HMG Contact Group for Afghanistan meets outside Afghanistan. This forum needs to be supplemented by meetings in Afghanistan, as many decisions are taken in-country. To date, contact between the UK Government and NGOs in Afghanistan has been ad-hoc. ActionAid would like regular meetings so that it can engage in planning and in-country decision making, and provide feedback, including constructive criticism. Through their work on the ground, ActionAid and other NGOs have a much better understanding of the Afghan people, and UK Government should make better use of NGOs’ local knowledge.

Theme 7. What are the challenges faced by NGOs in engaging in the delivery of a Comprehensive Approach to a particular crisis? How might MoD/UK Government assist NGOs in addressing these challenges?

ActionAid and other NGOs are working to different objectives from the UK Government and the international community in Afghanistan. NGOs wish to meet the needs of the Afghan people. The UK Government is focused on tackling the insurgency.

Theme 8. What are the challenges faced in moving between different stages of a Comprehensive Approach, for example from stabilisation to reconstruction?

ActionAid is not in a position to comment on this question.

Theme 9. How can local ownership for a Comprehensive Approach be established?

Local acceptance of the Comprehensive Approach can only be achieved by engaging Afghan people. To date this has not happened. Neither the Afghan people, nor their elected representatives (the members of the Afghan parliament), have been directly consulted about the Comprehensive Approach. Greater encouragement by the Afghan government and overseas governments for elected representatives, civil society and NGOs, would bring the Comprehensive Approach closer to the needs of the people of Afghanistan.

Theme 10. What lessons have been learnt from the application of the Comprehensive Approach in Iraq, Afghanistan or other countries?

The Afghan people need to be put at the centre of the Comprehensive Approach. The current focus on security and wider geo-political objectives will not benefit the Afghan people in the long run.
Appendix C: Médecins sans Frontières
NAO summary of meeting with a representative of Médecins sans Frontières 10th June 2009

Present from Médecins sans Frontières:

Vickie Hawkins, currently MSF-UK’s Head of Programmes, previously MSF’s head of mission in Afghanistan

Overview and context

Médecins sans Frontières (MSF) does not engage with governments in the planning or delivery of the Comprehensive Approach. MSF’s position on, and views of, the Comprehensive Approach are framed by its role as an exclusively humanitarian, medical NGO that delivers emergency aid according to need. Its prime objective is to save lives and alleviate immediate suffering. MSF’s focus on immediate humanitarian assistance can give it a different perspective on the Comprehensive Approach from NGOs who undertake development work (or a mix of development and humanitarian work) and may thus receive funds from UK Government or the wider international community for the purposes of building up local / governmental capacity. MSF does not engage in capacity-building as an objective in itself (although in stable settings it can be a by-product of our action).

If MSF is to be well-placed to meet the needs of people caught up on both sides of a conflict, and maintain the safety of its staff, it must be independent of governments and be perceived by local people to be independent, neutral and impartial. To maintain its independence, neutrality and impartiality, MSF limits its contact with governments taking part in a Comprehensive Approach. As a matter of policy, and in order to preserve independence, MSF relies on private funding for the majority of its income. It generally does not take government funding in areas of conflict (eg Afghanistan, Pakistan, Somalia, Iraq), particularly not from governments who are undertaking military operations (including peace keeping operations) in a country where MSF is operating.

The application of the Comprehensive Approach by the international community, and the inclusion (real or perceived) of NGOs in that Comprehensive Approach, can make it more difficult for MSF to deliver humanitarian aid in environments that are already hard to operate in. In Afghanistan, for example, there are large numbers of western NGOs who have close links with western governments and undertake activities that could be perceived as part of a state building agenda. With NGOs being generally perceived as a fairly homogenous group, the (real or perceived) association of some with a western state-
building agenda leads to increased risks for all (including MSF staff who are operating in-country).

Until 2004, MSF operated in Afghanistan. MSF closed its operations after the Afghan authorities responded inadequately to (and were even implicated in) an attack in the west of the country which killed five MSF employees. MSF are now looking to return to Afghanistan.

MSF initially operated in Iraq after the 2003 invasion but withdrew because of the security risks faced by its staff. MSF is now again present in Iraq and plans to expand its activities.

MSF are also operating in a number of other countries where there are conflicts including Sri Lanka and Columbia.

Theme 1. From a UK perspective, what does your organisation understand by the term “Comprehensive Approach”?
UK Government sees the Comprehensive Approach as coordinating and unifying all UK Government departments and non-government bodies (i.e. private sector organisations as well as NGOs) under a single overarching foreign policy objective.

Theme 2. Has the MoD and/or the UK Government effectively communicated what it understands by the Comprehensive Approach and the merits of such an approach?
The UK Government has provided information on, and some opportunity to discuss, the Comprehensive Approach. MSF gave two examples:

- NGOs were invited to the launch of the Stabilisation Unit;
- Via the UK’s NGO-Military Contact Group. MoD, FCO and DFID attend these meetings.

However, implications of the Comprehensive Approach and specifically how to ensure that space exists outside of it for independent humanitarian action, need continual discussion and attention.

Theme 3. Does your organisation see the Comprehensive Approach as an effective way of addressing international crisis?
From the perspective of the UN or UK Government, the logic of bringing together different instruments (e.g. defence, diplomacy, development) into a cohesive whole is understandable. But the Comprehensive Approach can compound the difficulties MSF face trying to operate in a conflict zone, and can make it more difficult for MSF to carve out the
space necessary for it to provide independent humanitarian, medical assistance to those most in need. For example, in Iraq humanitarian NGOs were seen by many as part of the wider western military effort and were presented by the US military as such. This false representation of humanitarian action as part of the military effort increased the security risks faced by NGO staff operating in the field and, as a result, MSF and many other humanitarian NGOs withdrew from Iraq. If MSF, and similar organisations, are squeezed out by the Comprehensive Approach, the population is deprived of life-saving assistance in its hour of greatest need. As an alternative the military will undertake relief activities, not only for altruistic purposes but also for the benefits of hearts and minds, but only in the areas under their direct control, which may result in large numbers of the civilian population receiving no support. And a withdrawal of NGOs will only increase the length of time that the military needs to undertake this direct provision of relief.

The Comprehensive Approach can also increase the militarisation of civilian settings or facilities, such as hospitals, in the host country. Many armed private security providers are being used to protect DFID staff working in Afghanistan. The presence of armed security providers in civilian facilities can turn the facilities, and the Afghan users, of those facilities into targets for belligerents. In Afghanistan, the UK Government has described armed private security providers as armed civilians, which risks militarising the “civilian status”. Under the Geneva Convention civilians are individuals who take no part in hostilities.

Theme 4. Has the MoD and/or UK Government worked effectively with the international community to adopt a Comprehensive Approach?
MSF is not in a position to comment on this question.

Theme 5. Has the MoD and/or the UK Government built the UK’s capacity to engage in a Comprehensive Approach to a crisis? What more could be done?
MSF is not in a position to comment on this question.

Theme 6. What are the challenges faced by NGOs in engaging in the planning of a Comprehensive Approach to a particular crisis? How might the MoD/UK Government assist NGOs in addressing these challenges?
MSF does not get involved in the planning or the delivery (see Theme 7) of the Comprehensive Approach as i) it does not have the same objectives as UK Government or

36 For example, prior to the invasion of Iraq, Colin Powell called on NGOs to act as "a force multiplier for us… an important part of our combat team".
other governments and ii) thus it wishes to maintain its independence from their efforts. The UK Government wishes to resolve conflict in a way which best suits the interests of the UK. MSF does not share that objective and maintains its complete independence from it, wishing only to provide impartial humanitarian assistance to civilians caught up in a conflict situation regardless of which side of a frontline they may reside.

**Theme 7. What are the challenges faced by NGOs in engaging in the delivery of a Comprehensive Approach to a particular crisis? How might MoD/UK Government assist NGOs in addressing these challenges?**

MSF does not engage in the delivery of the Comprehensive Approach (see Theme 8).

MSF’s objective to provide impartial humanitarian assistance based on need could put it at odds with governments seeking to apply the Comprehensive Approach. MSF gave the example of a country which was partly controlled by the host government and the international community (both of whom were seeking to apply the Comprehensive Approach) and partly controlled by belligerents. To assist the stabilisation of the whole country, the host government and the international community may wish to see NGOs involved in the Comprehensive Approach, helping to provide “hearts and minds” assistance to people living in areas controlled by the host government and international community. In such a situation, however, MSF would wish to provide services according to need and thus it may wish to also provide assistance to civilians living in areas controlled by belligerents. However, by providing humanitarian assistance in parts of the country controlled by belligerents, MSF would be demonstrating that the international community and host government did not have a monopoly on aid or service delivery and thus undermine the ‘hearts and minds’ strategy. It is also likely that, to provide humanitarian assistance, MSF would need to have (direct or indirect) contact with belligerents. The host government and international community might judge such contact as inappropriate.

MSF see the UK Government, and the international community more generally, making greater use of private sector to deliver aspects of the Comprehensive Approach. MSF noted that there can be limits on the locations where the private sector can and would be willing to operate. For example, contractors do not work impartially - they are driven by profit - and thus would generally not be willing to provide services in areas of Afghanistan not under the control of the international community.
Theme 8. What are the challenges faced in moving between different stages of a Comprehensive Approach, for example from stabilisation to reconstruction?
MSF is not in a position to comment on this question as it does not engage in the Comprehensive Approach. However, MSF emphasised that the application of the Comprehensive Approach in Afghanistan post 2001 had made it difficult for MSF to separate itself from the wider state building agenda which a large number of NGOs were perceived to be involved in (see Theme 7).

Theme 9. How can local ownership for a Comprehensive Approach be established?
MSF is not in a position to comment on this question.

Theme 10. What lessons have been learnt from the application of the Comprehensive Approach in Iraq, Afghanistan or other countries?
The conflict in Iraq left no space for humanitarian NGOs, such as MSF, to operate in a safe way. NGOs in general were seen by many as part of the wider western military effort, and thus there was limited recognition that individual humanitarian NGOs could be independent of, and have different objectives from, western governments. MSF generally proves its adherence to humanitarian principles (independence, neutrality, impartiality) through its work. But where initial distrust is high, it is very difficult for MSF to negotiate a way in so that they can deliver services and prove their strictly humanitarian character to local people by the way they operate on the ground.
Appendix D: Mercy Corps

NAO summary of meeting with a representative of Mercy Corps 5th June 2009

Present from Mercy Corps: Fernando Soares, Director of Programmes

Overview and context

Mercy Corps has been encouraged that military organisations, as part of seeking to develop and apply the Comprehensive Approach, have entered into greater dialogue with NGOs. Yet, combining and/or confusing the mandates of humanitarian and military/combatants, may have severe consequences, and considerably hinder access to vulnerable and/or remote populations in conflict settings. For instance, the use of the Provincial Reconstruction Teams (PRTs) in Afghanistan and Iraq to provide relief and development assistance, blurs the lines between military and humanitarian actors, thus increasing risks to NGO staff operating in the field, and reducing humanitarian access. Furthermore, the aid provided by PRT’s is not cost effective and is not provided on the basis of need. Humanitarian action is not an instrument of conflict resolution or crisis management or a tool for fighting terrorism as established clearly in the European Consensus on Humanitarian Aid.

Mercy Corps has operated in Iraq since 2003. Mercy Corps implements humanitarian and development projects, strengthening communities and promoting the rights of vulnerable populations, like women, youth, and persons with disabilities. To date, its programmes have reached over 4.5 million beneficiaries, throughout Iraq.

As Mercy Corps has operated in Iraq with European funds channelled through the agency’s European HQ, it has not had regular contacts with UK Government. Yet, since 2008, Mercy Corps has chaired the UK NGO Iraq Advocacy Group and engaged in a dialogue with DFID and the FCO.

Mercy Corps has been present in Afghanistan for twenty years. Its current work includes an agriculture livelihoods programme in 16 provinces in north, west and east Afghanistan funded by USAID. It also runs an agricultural programme funded by DFID in Helmand. Mercy Corps is the only large international NGO working in Helmand province. Mercy Corps attends the UK’s NGO Contact Group for Afghanistan.

Mercy Corps is also a member of the UK NGO-Military Contact Group and a member of the civil and military group of the European humanitarian NGO platform, VOICE.
Theme 1. From a UK perspective, what does your organisation understand by the term “Comprehensive Approach”?

Mercy Corps is not aware of any UK (see Theme 2) or international document which provides NGOs with a clear explanation or definition of the Comprehensive Approach.

Mercy Corps attended a NATO exercise in 2007 in which Civil-Military co-ordination was discussed among other topics. It was encouraged that the military were reaching out to NGOs to have a dialogue. The conference, however, demonstrated that there was no consistent view of the Comprehensive Approach within NATO. The conference also indicated that the military did not fully appreciate the diversity of the NGO community.

Theme 2. Has the MoD and/or the UK Government effectively communicated what it understands by the Comprehensive Approach and the merits of such an approach?

Mercy Corps is not aware of a UK Government-specific definition of the Comprehensive Approach.

An emerging consensus is that conflicts, such as the one in Afghanistan cannot be won by military means alone. And so the UK Government has increased cross-departmental collaboration to enable a more “comprehensive approach”. And the main role of the UK Stabilisation Unit - a joint venture between DFID, the FCO and the MoD - is to enable this approach. The UK Government’s aim is political: to reach stability by helping establish and sustaining a legitimate government.

Theme 3. Does your organisation see the Comprehensive Approach as an effective way of addressing international crisis?

Stabilisation is an inherently political process involving state building, development and at times military activities; whereas in principle, humanitarian and development assistance is independent, neutral and impartial - provided on the basis of need alone. Blurring the lines between political and humanitarian/development objectives can have negative implications for the acceptance of humanitarian actors, with real consequences for humanitarian access. Further, local perception of agencies as stabilisation actors can have security implications for aid organisations and beneficiary communities.

Besides, Mercy Corps see the Comprehensive Approach as being epitomised by the Provincial Reconstruction Teams (PRTs) in Afghanistan and Iraq. It does not consider that
PRTs are the right approach for delivering humanitarian and development assistance and views them as an inappropriate and ineffective. In particular:

- Communities want long-term development assistance based on transparency, accountability and local ownership. Such approaches are not compatible with the short-term imperatives which drive the military's stabilisation strategy. The military's use of often costly, ineffective and unaccountable implementing partners is also highly problematic;
- PRTs do not distribute humanitarian assistance within Afghanistan according to need;
- PRTs undermine the work of humanitarian and development NGOs and put NGO field staff at risk, thus reducing humanitarian access. By providing relief and development assistance, PRTs blur the lines between military and humanitarian actors. Afghans and Iraqis see military personnel and civilians undertaking the same work. This increases the risk to NGO field staff as they are seen as legitimate targets in the conflict, and thus hinders humanitarian access;
- PRTs are not a cost effective mechanism for delivering humanitarian or development aid. For example, PRT staff undertaking humanitarian or development activities are often escorted by armed personnel which increases cost and can reduce the willingness of Afghans to take-up the assistance provided.

Theme 4. Has the MoD and/or UK Government worked effectively with the international community to adopt a Comprehensive Approach?

Mercy Corps is not in a position to answer this question.

Theme 5. Has the MoD and/or the UK Government built the UK’s capacity to engage in a Comprehensive Approach to a crisis? What more could be done?

Mercy Corps is not in a position to answer this question.

Theme 6. What are the challenges faced by NGOs in engaging in the planning of a Comprehensive Approach to a particular crisis? How might the MoD/UK Government assist NGOs in addressing these challenges?

Humanitarian workers and programmes may be placed at risk if local populations, or warring parties, perceive ties between military and humanitarian workers; Mercy Corps believes that coordination between humanitarian actors and military/combatant should be avoided. Yet, dialogue may be needed at the operational level, strictly provided that it poses no security issue, particularly for beneficiaries and local partners, and that it is
necessary to save lives, protect and promote humanitarian principles, avoid competition and minimise inconsistency.

Mercy Corps willingness to coordinate with the military depends on context. Mercy Corps thinks that military assets and capabilities are to be used only in very limited circumstances in support of humanitarian relief operations as a ‘last resort’ - where there is no comparable civilian alternative. For a disaster, Mercy Corps may engage under established civilian-led humanitarian coordination mechanisms if:

- this is essential for the delivery of humanitarian aid;
- the use of military assets are under civilian control, thus avoiding any association between humanitarian aid and a military or political objective which could hinder the overall humanitarian efforts;
- this coordination will not be to the detriment of what Mercy Corps wishes to achieve.

In most conflict situations, Mercy Corps will not coordinate with the military in the field as this can jeopardise the NGO’s own objectives (e.g. can reduce Mercy Corps’ scope to operate in the host country). However, when necessary, Mercy Corps can engage in a dialogue with the military in the field and HQ level in Europe.

There are limits on the amount of information that can be exchanged between Mercy Corps and the military. As a matter of standard practice, Mercy Corps, like many NGOs, put substantial information in the public domain. However, Mercy Corps would not provide information which could be used to inform military operations or which might put Mercy Corps own operations at threat or risk.

Liaison at all levels between NGOs and the military can be hampered by the absence of a common, well understood language. Mercy Corps referred to the number of abbreviations used by military personnel at the NATO conference it intended on Civil Military relations (conference mentioned under Theme 1).

Theme 7. What are the challenges faced by NGOs in engaging in the delivery of a Comprehensive Approach to a particular crisis? How might MoD/UK Government assist NGOs in addressing these challenges?

Engaging in the delivery of a Comprehensive Approach would risk compromising Mercy Corps’ independence, impartiality and neutrality. Thus even in circumstances where Mercy Corps wanted to achieve the same objectives as a military organisation it would be very
difficult for Mercy Corps to be involved with, or be seen to be involved with, the delivery of a Comprehensive Approach.

UK policy makers and military need to comply with the existing international rules and guidelines and respect that humanitarian action cannot be part of a military or politically motivated operation. Besides, as involvement by the military in development can place beneficiaries, projects and project implementers at risk, and given doubts about the cost effectiveness and sustainability of military ‘quick impact’ projects, it is imperative that military assets are used in areas where they have a comparative advantage in terms of expertise and knowledge, for example in developing the capacity of the national security and law enforcement agencies. The role of PRTs should therefore be redefined accordingly. Their resources should be devoted to build up the capacity of the security and law enforcement agencies by providing adequate and sustained training and mentoring, material and logistics support.

Theme 8. What are the challenges faced in moving between different stages of a Comprehensive Approach, for example from stabilisation to reconstruction?
Stabilisation and reconstruction are likely to happen concurrently in a country and thus there may not be a need to manage a change between two distinct stages. It is not realistic to wait for the conflict to be over before reconstruction begins.

Theme 9. How can local ownership for a Comprehensive Approach be established?
Mercy Corps is not in a position to answer this question.

Theme 10. What lessons have been learnt from the application of the Comprehensive Approach in Iraq, Afghanistan or other countries?
The PRTs are an expensive and inappropriate way of delivering humanitarian and development assistance. For example, Mercy Corps could deliver an animal vaccination programme cheaper than a PRT which typically uses armed support.
Appendix E: World Vision

NAO summary of meeting with representatives of World Vision 5th June 2009

Present from World Vision:

Ian Gray, Head of Humanitarian and Emergency Affairs
Dr Edwina Thompson, Senior Civil-Military-Police Adviser

Overview and context

World Vision recognises that, in providing emergency relief and protecting vulnerable people in conflict-prone and unstable environments, NGOs often work in close proximity to host government forces, police, armed non-state actors, foreign troops and international peacekeepers. It sees that growing insecurity on the ground and policy developments, such as ‘winning hearts and minds’ campaigns, are creating an increasingly pressing need for appropriate NGO policies and operational guidance on how to interact with armed groups at both field and headquarter levels.

In 2008, World Vision prepared a report addressing “Principled Pragmatism” and it has developed a tool - HISS-CAM - to assist its staff to think through difficult operational and policy decisions they may face when interacting with military actors. The tool identifies that there is a spectrum of possible interactions between humanitarian and military operations, ranging from a humanitarian NGO curtailing its presence, through co-existence, co-ordination to co-operation. Despite the potential for co-operation, World Vision is clear, however, that it does not have a role in either contributing to a military organisation’s planning of a specific deployment or directly working with a military organisation to deliver a comprehensive approach.

World Vision has experience of operating in both Iraq and Afghanistan. It began operating in Iraq in 2003, but withdrew in 2005 because of poor security. It is currently assessing whether to return to Iraq. World Vision currently operates in the west of Afghanistan. It has contacts with foreign governments, such as Spain, Italy, Lithuania and the USA, who operate the Provincial Reconstruction Teams (PRTs) in the west of Afghanistan. It has limited contact with the UK government in relation to Afghanistan.

37 www.worldvision.org.uk/upload/pdf/Principled_pragmatism.pdf
Theme 1. From a UK perspective, what does your organisation understand by the term “Comprehensive Approach”?
The Comprehensive Approach has evolved from the “3Ds” approach to security which incorporates Defence, Diplomacy and Development. World Vision is encouraged that MoD’s 2005 guidance on the Comprehensive Approach (see Theme 2) separates “diplomatic, military and economic instruments of power” from an “independent package of developmental and humanitarian activity.” This separation, however, has not been maintained clearly on the ground in Afghanistan (see Theme 3).

Theme 2. Has the MoD and/or the UK Government effectively communicated what it understands by the Comprehensive Approach and the merits of such an approach?
World Vision is aware of MoD’s guidance on the Comprehensive Approach (Joint Discussion Note 4/05). It is not aware of any UK government-wide guidance on, or definition of, the Comprehensive Approach.

MoD guidance gives the impression that there are two ways of operating the Comprehensive Approach:
  i) fully co-ordinated and regulated activity with all parties working to a single plan;
  ii) more limited co-ordination to ensure that the activities of different agencies do not conflict.
MoD and other military organisations may prefer the former, but World Vision would not be part of a fully co-ordinated approach. World Vision can however work with military organisations to de-conflict their separate activities so that the activities do not work against each other or duplicate each other.

Theme 3. Does your organisation see the Comprehensive Approach as an effective way of addressing international crisis?
Yes, but only to a point. World Vision welcomes the aim of the Comprehensive Approach to first stabilise a country and then stop it slipping back into conflict. However, the time horizons of different government and non-government agencies can make it difficult to establish a common long term plan which both addresses stabilisation and tackles the longer term risk that a country slips back into conflict. For example, diplomats focus on short term opportunities, the military often have a two to three year horizon, whilst government aid agencies and development NGOs are often focused on a 10 year development agenda.
The UK’s application of the Comprehensive Approach in Afghanistan has not followed the concepts set down in MoD guidance (see Theme 1). The split between “diplomatic, military and economic instruments of power” and an “independent package of developmental and humanitarian activity” has not been maintained. Aid has been used to achieve stabilisation objectives. For example, increasing amounts of UK aid is being allocated to Helmand for stabilisation purposes rather than being used to meet pressing humanitarian needs in other provinces. World Vision’s position is that aid should be distributed on the basis of need, rather than as a tool to stabilise a country.

**Theme 4. Has the MoD and/or UK Government worked effectively with the international community to adopt a Comprehensive Approach?**

The UK’s record is mixed. UK has led efforts for reform and coherence in the humanitarian arena with, for example, the UK pushing for greater use of pooled-funding across donor countries. However, on the ground the UK has not been effective in some of the activities it has taken the lead on for the international community such as the Counter Narcotics Strategy for Afghanistan.

**Theme 5. Has the MoD and/or the UK Government built the UK’s capacity to engage in a Comprehensive Approach to a crisis? What more could be done?**

The establishment of the Stabilisation Unit (formerly the Post Conflict Reconstruction Unit) has increased the UK’s capacity to engage in unstable countries. However, the Stabilisation Unit to date has primarily focused on Iraq and Afghanistan thus reducing the UK’s ability to contribute to other stabilisation activities where it has potential important influence. The Government is in the process of substantially increasing the civilian capacity of the Stabilisation Unit by increasing the number of civilian experts it can call upon to be deployed at short notice to conflict and post-conflict areas.

DFID is not seen as equal partner to MoD and FCO. There is a risk, therefore, that under a Comprehensive Approach DFID’s aid agenda and objectives are squeezed by the priorities of MoD and FCO. (Theme 3 refers to the increasing use of UK aid for stabilisation purposes in Helmand.)

**Theme 6. What are the challenges faced by NGOs in engaging in the planning of a Comprehensive Approach to a particular crisis? How might the MoD/UK Government assist NGOs in addressing these challenges?**

To maintain its independence, World Vision’s policy is not to engage with Government organisations which are planning military operations. It therefore does not undertake
“deployment specific” training but would be willing and well-placed to provide generic training to military and non-military staff. However, it has not done so to date in the UK. DFID funding is not available for such training and World Vision’s polices do not enable it to accept funding from MoD.

World Vision sees an opportunity for NGOs to work together to strengthen and develop standard rules for engaging with the military, and additional support to the often marginalised Civil-Military Coordination Section within the UN Office for the Coordination of Humanitarian Affairs. These rules could build on World Vision’s HISS-CAM model (see Overview and context section). However, it is likely that such development work would require funding from government or international sources.

Theme 7. What are the challenges faced by NGOs in engaging in the delivery of a Comprehensive Approach to a particular crisis? How might MoD/UK Government assist NGOs in addressing these challenges?
World Vision does not have a role in delivering a Comprehensive Approach. Theme 2 explains that World Vision may work with military agencies to de-conflict their separate activities. However, World Vision would not operate under the control of military agencies or take funding from military agencies.

Theme 8. What are the challenges faced in moving between different stages of a Comprehensive Approach, for example from stabilisation to reconstruction?
Conflicts may not pass through distinct phases as implied by the question. Stabilisation and reconstruction activity can often be undertaken at the same time, for example.

Theme 9. How can local ownership for a Comprehensive Approach be established?
Local ownership is very difficult, if not impossible, where the Comprehensive Approach is conceived, developed and introduced from the outside by the international community rather than by representatives within the host country. At best a Comprehensive Approach may gain the acceptance of the host country. Early joint engagement in the planning stage of specific institution-strengthening, such as security sector reform, would certainly help to increase host government ownership and leadership, which are crucial to success. From the perspective of local communities, however, as is the case in Afghanistan, dialogue and planning can in fact put local people at risk of attack by those resisting the presence of the international community.
Theme 10. What lessons have been learnt from the application of the Comprehensive Approach in Iraq, Afghanistan or other countries?

Care needs to be taken in seeking to apply lessons from Afghanistan and Iraq to other countries in conflict. There are substantial differences between conflicts, for example, in their causes and nature. As UK Government recognises, the Comprehensive Approach cannot be a prescribed set of procedures, but must be applied flexibly to reflect the specific circumstances of the conflict. Across most of Whitehall this appears to be accepted conceptually, but there is little evidence of it being operationalised effectively.

Amongst the Afghan people there are different views of the Provincial Reconstruction Teams. There is, for example, anecdotal evidence that the local people’s perspectives of the PRTs operating in Western Afghanistan are relatively favourable and local people have been reported as being frustrated with PRTs for not undertaking enough development work.
Appendix F: Islamic Relief

NAO summary of meeting with representatives of Islamic Relief 4th June 2009

Present from Islamic Relief:

Haroun Atallah, Finance Director (and former CEO)
Jamal Al-Din Belke, Head of Middle East and Eastern Europe
(Country Director of Islamic Relief Afghanistan 2002-2004)

Overview and context

Islamic Relief has had an interest in the Comprehensive Approach and similar concepts such as the 3Ds (Diplomacy, Defence, Development) over the last 5 to 6 years. Islamic Relief staff have, for example, attended relevant forums and Islamic Relief has had some engagement at a policy level with the European Union as well as the UK Government.

Military engagement in the provision of aid, or contact between military organisations and NGOs, blurs the distinction between military and civilian organisations and can bring serious risks to NGO staff. In some cases, such as the Asia / Kashmir earthquake in 2005, military engagement in humanitarian activities, may be welcomed as the military have logistics and other support which NGOs do not have. However, where countries are in conflict or are unstable, such as Iraq and Afghanistan, contact with the military, and western governments who have military forces operating on the ground in combat roles, can damage the reputation of an NGO as impartial, neutral and independent, and consequently NGO staff can be seen as spies or collaborators. Reputational damage can be long lasting and can increase the risk to NGO staff (from both local and international NGOs) of intimidation and serious attacks, including kidnapping. Association with the UK military and in certain circumstances the UK Government can not only bring risks to Islamic Relief’s staff in the field but can also increase the risk that the NGO and its UK staff are seen domestically as “selling out”.

Islamic Relief has been operating in Iraq since the 1990’s. After 2003, Islamic Relief reduced its presence in Baghdad because of concerns over the safety of its staff who, for example, had received threatening messages and were being watched. Its main office in Iraq is now in a more stable location in the North. Islamic Relief has not highlighted the level of work it has been doing in Iraq as this can endanger its staff. For example, if Islamic Relief is viewed in Iraq as a large NGO which may have substantial resources, this increases the chance of its staff being kidnapped so a ransom request can be made.
Islamic Relief does not seek funding from the UK Government, or other western governments, for its work in Iraq as it does not wish to increase the risks to its staff, or be seen to be an organisation which has benefited from the conflict.

Islamic Relief was operating in Afghanistan before the overthrow of the Taliban in 2001. Since 2001, Islamic Relief has undertaken a range of work in Afghanistan. This work was initially focused on the south of the country but it has now extended its operations more in the north. Islamic Relief has received funding from DFID for some of its projects in Afghanistan.

Theme 1: From a UK perspective, what does your organisation understand by the term “Comprehensive Approach”?

The Comprehensive Approach is a development of the 3Ds approach. In Afghanistan, it uses hearts and minds activities to try and buy-in local community support for the central government as well as military operations that are taking place within the country. The Comprehensive Approach seeks to demonstrate to the local population that there are benefits (e.g. such as reconstruction) to be gained by the international community undertaking activities in their country.

Theme 2: Has the MoD and/or the UK Government effectively communicated what it understands by the Comprehensive Approach and the merits of such an approach?

Islamic Relief has not received any communications from the UK Government defining the Comprehensive Approach and its merits. It was not aware of MoD guidance on the Comprehensive Approach.

Theme 3: Does your organisation see the Comprehensive Approach as an effective way of addressing international crisis?

Islamic Relief does not see closer cooperation with the military as desirable. Rather there is need for greater clarity on relations between NGOs and the military in conflict situations (such as Afghanistan and Iraq). NGOs need to be (and be perceived to be) neutral, independent and impartial where there are conflicts between warring parties. NGOs should not be asked or encouraged to take sides with one or other of the parties in a conflict. One of the drawbacks of the Comprehensive Approach has been that western governments and their militaries (in particular, the US military) have implemented the Approach as if NGOs are either ‘with us or against us’. NGOs wish to be impartial and neutral and provide services to poor people independent of where those people reside.
The risks to NGOs of operating in unstable countries are significantly increased where overseas military are involved and, especially, where this involvement leads to a blurring in the roles between military organisations and NGOs. For example, when military organisations get involved in the provision of aid it is very difficult for local people to separate this from activities undertaken by NGOs.

Islamic Relief provided examples of the risks their staff have faced when working in countries where the Comprehensive Approach was being applied. These examples included Islamic Relief’s then Head of Emergencies being arrested and tortured by the Sadam Hussein regime in Spring 2003. The regime accused the Head of Emergencies of acting as a spy and he was lucky to get out of the situation alive.

In general, the level of funding available from governments to support humanitarian and development work in Afghanistan has increased significantly since 2001. However, the environment for delivering that work has become more difficult as the security situation, including general law and order, has deteriorated.

**Theme 4: Has the MoD and/or UK Government worked effectively with the international community to adopt a Comprehensive Approach?**
With respect to NGOs, the UK Government’s engagement with the wider international community has been inadequate and sporadic. NGOs are viewed and governed in very different ways by the UK, by other European countries and by the US. A more consistent or standard approach would yield significant benefits for governments and NGOs.

In accordance with the Afghan government’s wishes, the UK Government and other donors have increasingly moved funding away from projects to the multi-donor funded National Solidarity Programme. This change has the potential to increase the credibility of the Afghan Government. However, insufficient resources have been available to administer these large flows of aid and ensure they are well spent and effective, and that local delivery mechanisms do not become corrupt.

**Theme 5: Has the MoD and/or the UK Government built the UK’s capacity to engage in a Comprehensive Approach to a crisis? What more could be done?**
Islamic Relief is not well-placed to comment on the capacity of the UK Government.
From an NGO perspective, the level of engagement with Government, including the EU, has increased significantly on aid-related topics in general. For example, Islamic Relief has been asked to contribute to government white papers. It has also been asked to contribute to opposition party documents. This increasing amount of policy work has implications for Islamic Relief as it has to develop its own capacity and research units so that it is able to have an intelligent discourse with UK Government. It is difficult for NGOs to obtain funding for such policy work, and if UK Government wants and expects a greater debate with NGOs, then it should assist this by providing funding, for example, through umbrella bodies which represent NGOs.

Theme 6: What are the challenges faced by NGOs in engaging in the planning of a Comprehensive Approach to a particular crisis? How might the MoD/UK Government assist NGOs in addressing these challenges?

Islamic Relief does not engage in planning the Comprehensive Approach as it:
1) does not share the same overriding objectives as UK Government. Islamic Relief is not interested, for example, in regime change but wants to provide services to poor people who can be hurt by belligerents and government forces;
2) wishes to maintain its independence, neutrality and impartiality.

Islamic Relief may, however, have a dialogue with the UK Government and other governments regarding particular countries and situations. Reasons for dialogue include:
- Self preservation. Islamic Relief may wish to make governments aware of where they are operating within a country;
- To exchange information and knowledge on humanitarian issues, in particular, with DFID.

Any dialogue will, however, usually take place outside of the country concerned by, for example, bringing Islamic Relief’s in-country staff to Europe. This reduces the risk that the nature of the contact is misconstrued.

There can be a difference between the planning timescales of government and the time required to deliver development objectives. Islamic Relief ran a programme aimed at reducing poppy cultivation. This showed that to encourage Afghans to grow alternative crops to poppies requires a long term commitment of 10 years or more. But aid agencies may only make short term commitments of funds to projects. Thus there are risks that projects do not get renewed, for example, because there is a change in political leadership, or the agency decides to channel its money through a multi-donor pool (e.g. the National Solidarity Programme in Afghanistan) rather than use it to fund its own projects.
Theme 7: What are the challenges faced by NGOs in engaging in the delivery of a Comprehensive Approach to a particular crisis? How might MoD/UK Government assist NGOs in addressing these challenges?

Islamic Relief does not engage in the delivery of the Comprehensive Approach. In some countries where the Comprehensive Approach is being applied, Islamic Relief may, however, undertake programmes which are funded by the non-military arms of government participating in the Comprehensive Approach. As explained in the “Context and overview” section Islamic Relief has undertaken work funded by DFID in Afghanistan but it has not undertaken UK Government sponsored work in Iraq.

Where Islamic Relief is undertaking work funded by governments involved in a Comprehensive Approach this has the potential to create tension. Islamic Relief may not wish to make public the identity of its funder as this could increase risks to its staff. However, the funder may wish to generate publicity for the projects it is supporting in the host country, and in its own country to serve the government’s domestic agenda. To date, this problem has not arisen on DFID funded projects as the Department has recognised the risks to NGO independence.

Theme 8: What are the challenges faced in moving between different stages of a Comprehensive Approach, for example from stabilisation to reconstruction?
Not addressed.

Theme 9: How can local ownership for a Comprehensive Approach be established?
Not addressed.

Theme 10: What lessons have been learnt from the application of the Comprehensive Approach in Iraq, Afghanistan or other countries?

The UK Government and other governments are now focusing on what should be done to rebuild Iraq and Afghanistan. They are not looking to evaluate how their interventions have impacted on:

- the humanitarian and development agendas. Would the sums spent by the West on military action have delivered better outcomes if the money had instead been used for humanitarian and development programmes in Afghanistan and Iraq?
- the safety of the people in the West.
Appendix G: British and Irish Agencies Afghanistan Group and Afghan Aid

NAO summary of meeting with representatives of British and Irish Agencies Afghanistan Group and Afghan Aid 2nd June 2009

Present from the British and Irish Agencies Afghanistan Group and Afghan Aid:

- Elizabeth Winter    Vice Chair Afghan Aid, Special Adviser to BAAG on Policy and Advocacy
- Basir Abdul       Director of BAAG

Overview and context

British and Irish Agencies Afghanistan Group (BAAG) is an umbrella group covering 26 NGOs. It seeks to engage in issues of policy and good practice and get the Afghan voice represented, wherever possible, by Afghans themselves.

Afghan Aid (AA) is a UK based charity. It is the largest single country NGO operating in Afghanistan. Its current work in Afghanistan includes agriculture and rural development programmes and it is one of the implementing partners of the Afghan National Solidarity Programme.

BAAG/AA see the UK’s Comprehensive Approach as being military driven. BAAG/AA do not engage in the planning or delivery of the Comprehensive Approach as they do not share the same goals as the MoD and they wish to maintain their independence and impartiality. BAAG/AA do, however, liaise with MoD and the UK Government on policy matters, in particular, where they see opportunity which has the potential to benefit the Afghan people.

BAAG/AA have a significant interest in the Comprehensive Approach and civil-military-relations. For example, BAAG jointly commissioned research, published in 2008, exploring Afghan perceptions of civil-military relations. BAAG/AA have also had substantial contact with MoD and other UK Government Departments on the Comprehensive Approach. This has included participating in pre-deployment discussions with MoD at Shrivenham (the MoD’s Defence Academy). BAAG has also had engagement on Afghanistan with international organisations, including ongoing engagement with NATO’s public policy department.

39 Afghan Hearts, Afghan Minds - Exploring the Afghan perceptions of civil-military relations 2008: Research conducted for the European Network of NGOs in Afghanistan and the British and Irish Agencies Afghanistan Group. Elizabeth Winter is also a Special Adviser to ENNA.
In summarising their position, BAAG/AA said that Afghanistan is a very difficult operating environment and all organisations, whether government or NGOs, will make mistakes. There is a need for different actors engaged in Afghanistan to understand each other better and support each other more.

**Theme 1: From a UK perspective, what does your organisation understand by the term “Comprehensive Approach”?**

The UK Government’s approach to the Comprehensive Approach is Whitehall focussed. It centres on getting UK Government Departments to collaborate and coordinate their objectives, strategies and tools. This is laudable but it has two key weaknesses:

- in practice UK Government departments are sometimes hostile to each other rather than working together. If the Comprehensive Approach is going to work in Whitehall there is need for the key people in each department to want to collaborate and co-ordinate. The Stabilisation Unit has had success in breaking down some of the barriers to effective joint working;
- it is too UK-focused. There is inadequate engagement with other governments and international institutions, such as the UN.

Internationally, organisations, such as the EU and NATO, have been seeking to internationalise the Comprehensive Approach as a concept.

**Theme 2: Has the MoD and/or the UK Government effectively communicated what it understands by the Comprehensive Approach and the merits of such an approach?**

No. UK Government has not effectively communicated its understanding of the Comprehensive Approach. In part, the absence of communication may reflect the lack of a shared or common understanding across UK Government on the Comprehensive Approach.

**Theme 3: Does your organisation see the Comprehensive Approach as an effective way of addressing international crisis?**

The Comprehensive Approach adopted by the UK has not worked in Afghanistan. UK Government departments have not worked sufficiently closely together and there has been a disconnect between the Comprehensive Approach as seen in Whitehall and the realities on the ground in Afghanistan. The Comprehensive Approach has not been informed by the views of the Afghan people and is not addressing their priorities which are improved governance and establishing the rule of law (see theme 9). The Comprehensive Approach has not been tackling the root causes of the insecurity in Afghanistan. Furthermore, the UK...
Government’s Comprehensive Approach is not adequately co-ordinated with the approaches of other countries and international organisations.

Military forces in Afghanistan have not consistently respected the independence and mandate of humanitarian organisations, which can compromise the safety and effectiveness of NGOs working on the ground. In 2008 the Afghanistan Civil-Military Working Group approved a set of “Guidelines for the Interaction and Coordination of Humanitarian Actors and Military Actors in Afghanistan”. This built on major conventions and procedures. These Guidelines have been signed by United Nations Assistance Mission and the International Security Assistance Force, amongst others. The Guidelines have lead to some improvements. For example, NATO ordered their troops to stop using white painted vehicles for military use as they should be exclusively for non-military actors. However, there remain examples of where the Guidelines have not been complied with by military forces. The main violators of the Guidelines have been US troops. Violations blur the distinction between civil and military organisations, increasing the risks faced by those NGO staff working on the ground.

If the Comprehensive Approach is going to be an effective way of addressing the problems of a country in conflict it needs to:

- be civilian lead;
- be operated in a way which respects the boundaries and mandates of different organisations;
- reflect the context of the country where it is being applied, and be based on a good understanding of the local people;
- support the development objectives of the host country and the priorities of the local people;
- take account of the range of international governments and international bodies who might be involved in the host country.

Currently different actors and countries are coming to Afghanistan with their different approaches. Ideally, all actors should come together to achieve the objectives of the host government and people under the oversight of a single body, such as the UN.
Theme 4: Has the MoD and/or UK Government worked effectively with the international community to adopt a Comprehensive Approach?

UK Government has tried to work with other countries. For example, the UK has sought to bring the US round to the UK’s way of thinking on the Comprehensive Approach which has been helpful.

Some key organisations in Afghanistan, however, do not operate in an integrated way as advocated by the Comprehensive Approach. For example, BAAG/AA has seen no evidence that the Joint Co-ordination and Monitoring Body[^40] operates along the lines of the Comprehensive Approach.

The absence of effective co-ordination across the approximately 40 donor countries, the 38 troop contributing countries and international organisations (such as the World Bank) places burdens on the Afghan Government. Each country and organisation wants its own relations with the Afghan Government.

Theme 5: Has the MoD and/or the UK Government built the UK’s capacity to engage in a Comprehensive Approach to a crisis? What more could be done?

BAAG/AA were not able to comment on the capacity of the UK Government.

From an NGO perspective, UK Government could do more to fund NGOs so that they can engage in policy debates on the Comprehensive Approach and civil-military-relations. Currently, BAAG/AA does not have the resources to respond to all the requests they receive from UK Government. It is very difficult for NGOs, and NGO umbrella groups, to raise funds from private sources to support policy discussions. Thus, if the UK Government wishes to have input from NGOs who have had the time to consider policy issues, the Government may need to support NGOs through DFID.

Theme 6: What are the challenges faced by NGOs in engaging in the planning of a Comprehensive Approach to a particular crisis? How might the MoD/UK Government assist NGOs in addressing these challenges?

[^40]: “The Afghan Government and the international community established the Joint Coordination and Monitoring Board for overall strategic coordination of the implementation of the Afghanistan Compact after the endorsement of the Afghanistan Compact and the interim Afghanistan National Development Strategy (I-ANDS) at the London Conference and the ensuring Security Council Resolution No.1659.”

BAAG/AA drew a distinction between integration and co-ordination. Because of their different mandates, NGOs maybe willing to co-ordinate with UK Government as part of a Comprehensive Approach, but most NGOs will not want to integrate activities as this would compromise their impartiality and independence.

BAAG/AA do not engage in the planning of the Comprehensive Approach as i) they do not share the goals of MoD or the UK Government and ii) they do not want to get too close to what is a military dominated concept as this could impact on their independence and neutrality. BAAG/AA do, however, liaise and engage with MoD, and UK Government in general, at a policy level, and are particularly interested to do so when they see an opportunity which has the potential to benefit the Afghan people.

MoD’s efforts to consult and engage with BAAG/AA and other NGOs have been sporadic and haphazard. When consultation happens, it usually takes place ahead of the deployment of forces. The level of consultation and engagement can be dependent upon the views and interest of the individuals who hold key posts in the MoD.

The short duration of some military postings in Afghanistan can make it difficult for NGOs to establish and maintain effective liaison in-country.

Theme 7: What are the challenges faced by NGOs in engaging in the delivery of a Comprehensive Approach to a particular crisis? How might MoD/UK Government assist NGOs in addressing these challenges?

BAAG/AA do not engage in the delivery of the Comprehensive Approach for reasons set out under theme 6.

BAAG/AA said that NGOs are not always able to operate in areas the military think they should do. If a location is being “held” by the military it does not mean that it is safe for unarmed NGO staff to start to deliver programmes in what may well be an unfamiliar setting.

Theme 8: What are the challenges faced in moving between different stages of a Comprehensive Approach, for example from stabilisation to reconstruction?

There is likely to be significant overlap between the phases of the Comprehensive Approach. For example, some reconstruction activity is likely to be involved during each of the stages typically identified by the military - that is “take, hold, develop”.

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Theme 9: How can local ownership for a Comprehensive Approach be established?
First the UK Government and the international community need to be clear about which Afghans they would like to see take ownership of the Comprehensive Approach. If it's the Afghan people, then the UK Government and other governments need to engage with the real representatives of the Afghan people, and not just those in positions of power such as senior governors and police authorities. Engagement with the local people can be difficult to achieve, but it would be assisted by UK Government and other governments building up civil society. DFID's work on civil society is generally well regarded. However, in Afghanistan DFID has rather neglected the development of civil society.

Local acceptance is only likely if the Comprehensive Approach addresses issues which are important to local people. BAAG sponsored research (see overview and context 1) identified that, whilst development is important, the priorities of the Afghan people are improved governance and establishing the rule of law.

Theme 10: What lessons have been learnt from the application of the Comprehensive Approach in Iraq, Afghanistan or other countries?
1) The Comprehensive Approach should deliver what the Afghan people want first (i.e. improved governance and establishing the rule of law). BAAG sponsored research shows that the “hearts and minds” philosophy and projects do not work as they do not address the priorities of local people. Currently, it could be argued that the focus of the international community’s efforts is not on state building but on image building for their military intervention.

2) The application of the military driven Comprehensive Approach to Afghanistan has presented DFID with significant challenges:
   - Allocating aid. In Afghanistan, DFID’s aid is used in two ways. A high proportion of DFID's aid - around 80 per cent - goes through multi government trust funds. This is seen by many, including the Afghan Government, as an effective way of providing aid. Of the remaining 20 per cent, however, the majority is now used by DFID for projects in Helmand which are supporting the military intervention. By focusing the aid it directly manages on a single province, DFID is going against its general principle that aid should be distributed according to need, with the aim of reducing poverty.
   - Operating projects in insecure environments. Due to the level of insecurity, development projects have been difficult to establish and deliver in Helmand. The consequent slow progress has frustrated local people, including those in provincial government, as they had expected development to happen quickly.
The increasing focus of DFID on Helmand has reduced the amount of UK funding available for NGOs working elsewhere in Afghanistan. For example, DFID has stopped funding a “livelihoods programme” Afghan Aid had been running in a number of drug producing areas of Afghanistan. The programme had been successful and was supporting the UK Government’s objective to reduce the availability of narcotics.

Rather than being Helmand focused, DFID should allocate its funding according to need and aim for a more geographically balanced programme of support. Such a programme would improve the outcomes achieved from aid spending and reduce the risk that perverse incentives are generated (i.e. increasing flows of aid to insecure provinces could encourage instability elsewhere in Afghanistan).

3) Inadequate attention has been given by the international community and UK to strengthening the education system in Afghanistan. Education should have been a priority at the start of the international community’s involvement in Afghanistan. Improving the education of Afghans is a key building block to improving the capability and capacity of the Afghanistan state.
Appendix H: NGO 10
NAO summary of meeting with representatives of NGO 10 3rd June 2009

Present from NGO 10: Staff based in Afghanistan and the UK

Overview and context
Experience in Afghanistan challenges the assumption that an integrated approach between military and civilian actors is a good thing. Rather NGO 10’s in-country team sees the integrated approach adopted in Afghanistan as jeopardising the prospects for improving security, reducing poverty and establishing a just and functional government.

The British Government’s objective for Afghanistan is to tackle counter insurgency. NGO 10 argue that it is therefore important to look at the root causes of insurgency which are:

1) local Afghan communities are not protected;
2) high levels of poverty and unemployment;
3) the absence of just and functional Government.

NGO 10 has not seen evidence that the Comprehensive Approach is successfully addressing these three issues. For example, the Provincial Reconstruction Teams (PRT) operate along the lines of the Comprehensive Approach. NGO 10 is not aware of any PRT that has brought greater stability to its province.

By bringing the military closer to development efforts in Afghanistan, NGO 10 see the Comprehensive Approach as compromising the effectiveness of development activity and jeopardising the safety of civilians (both Afghans and foreigners) undertaking development activities.

Note on this summary. Most of the discussion focused on NGO 10 concern’s over the validity of the Comprehensive Approach, and its application in Afghanistan. As a consequence some of the themes (set out below) were not directly covered during the meeting.

Theme 1: From a UK perspective, what does your organisation understand by the term “Comprehensive Approach”?
Question not addressed during discussions.
Theme 2: Has the MoD and/or the UK Government effectively communicated what it understands by the Comprehensive Approach and the merits of such an approach? Question not addressed during discussions.

Theme 3: Does your organisation see the Comprehensive Approach as an effective way of addressing international crisis?

NGO 10’s in-country team identified the following reasons why the Comprehensive Approach had not proved successful in Afghanistan.

i) **Hearts and minds projects do not work and do not deter insurgency attacks.**
Afghan people are suspicious of foreign military forces. Many within the international community, including the UK, assumed that they were starting with a blank slate. This view, however, ignored the years of foreign interference in Afghanistan, and the decade of neglect in the 1990s when Afghanistan was no longer perceived as useful.

Individual quick impact development projects often do not address key development challenges. Moreover, with full consideration given to the particular history and context of Afghanistan (especially the south and south-east), namely, the history of foreign military interference, persistent poverty and unemployment, corrupt and unjust government, excessive use of force by international military forces, widespread illiteracy, Islamist propaganda, and the systematic use of terror and intimidation by militants, it is clear that limited assistance projects will have little impact on support for, or engagement in, insurgent activity.

In addition, in some cases insurgents view military-sponsored construction/development projects as attractive and more legitimate targets for attack.

ii) **As indicated above, excessive use of force by foreign military forces in air-strikes and house-raids, especially by the US in the early days, continues to undermine the Afghan people’s support for the international presence in their country.**

iii) **In this context of Afghanistan, it will be difficult, if not impossible, for any organisation associated with military forces to achieve sufficient levels of local ownership.** Local people need to take on and implement or use the facilities or resources provided by development projects. Without local ownership development
projects will not reach the root of the problem, or build local capacity, and will therefore not succeed. Any organisation (e.g. NGO) associated with military forces, particularly in the south and south-east, will not be able to build sufficient local ownership for their work to have a significant development impact.

iv) Corruption is manifest and the Afghan people see individuals who are predatory succeeding. This undermines the Afghan people’s confidence in their government.

The international community initially decided to work with Afghan nationals who were in positions of power, regardless of their record or background. This has resulted, for example, in the Afghan cabinet including warlords. Also the international community has had little appetite to get to grips with corruption. Development activity will not bring security or significant development gains, if the Afghan people do not have some trust in their government.

v) High levels of poverty and unemployment can make Afghan people susceptible to insurgents. It is a source of dishonour to Afghan men if they are not able to look after their family.

vi) The destabilising tactics of the insurgents. The insurgents are increasing their attacks on local security forces, staff of NGOs (both Afghans and foreigners) and overseas military forces. The number of attacks on NGO staff, for example, in the period June 2008 to September 2008 was at its highest level since 2001.

In respect of resources, the UK Government has rightly supported programmes with national impact. However, in terms of political efforts the Government has focused too much on Helmand province and given too little attention to activities which would affect Afghanistan as a whole.

The National Solidarity Programme41 (NSP) has been successful in engaging elected Afghan community councils in development projects. The Programme involves national and international NGOs and is lead by the Afghan Ministry of Rural Rehabilitation and

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41 The National Solidarity Programme (NSP) was created in 2003 by the Ministry of Rural Rehabilitation and Development to develop the ability of Afghan communities to identify, plan, manage and monitor their own development projects. http://www.nspafghanistan.org/
Development. Many NGOs are, however, considering withdrawing from the Programme: the blurring of the civil-military distinction in Afghanistan means that NGOs are increasingly targeted by insurgents where they have an association with the Afghan government.

Theme 4: Has the MoD and/or UK Government worked effectively with the international community to adopt a Comprehensive Approach?
The United Nations Assistance Mission in Afghanistan (established in 2002) and UN agencies, such as UNICEF, initially had too light a footprint across Afghanistan. For example, UNAMA only established its provincial offices from around 2007. UK Government should use its position as a major funder of the UN, to expand and improve the effectiveness of UN operations in Afghanistan.

There is poor co-ordination of international donors in Afghanistan with no shared approach to the identification of gaps and balancing of resources. The lack of co-ordination increases the burdens on the Afghan government of interacting with donors.

Theme 5: Has the MoD and/or the UK Government built the UK’s capacity to engage in a Comprehensive Approach to a crisis? What more could be done?
The ability of UK Government to understand the situation in Afghanistan and liaise effectively with stakeholders, including NGOs, depends on the experience and expertise of its staff. The short duration of some postings, particularly in the military, can make it more difficult for staff to operate effectively.

Theme 6: What are the challenges faced by NGOs in engaging in the planning of a Comprehensive Approach to a particular crisis? How might the MoD/UK Government assist NGOs in addressing these challenges?
NGO 10 see the Comprehensive Approach as blurring the distinction between military and NGO activity, making it more difficult for NGOs to operate effectively and securely.

In Afghanistan, the military’s (including the PRTs’) role in humanitarian and development projects blurs the distinction between military and civilian organisations. The blurring happens because:

i) military authorities / PRTs are working closely with some NGOs. There is a diverse range of NGOs in Afghanistan. Some NGOs (often US) have been happy to work closely with military organisations. Most UK NGOs however do not want to be seen as working in an integrated way with the military authorities;
ii) PRTs are directly undertaking some military and humanitarian/development projects. If military authorities are clearly associated with humanitarian and development work there is a risk that all people that undertake such activities will be seen by Afghans as part of, or closely associated with, the military. This jeopardises the safety of people working for NGOs - they can be seen as legitimate targets for insurgents (see above). Declining safety increases the risk that NGOs pull out from providing humanitarian and development activities and consequently can increase the demands on foreign governments and their military organisations.

The military’s involvement in humanitarian activities is at odds with the “Guidelines for the Interaction and Coordination of Humanitarian Actors and Military Actors in Afghanistan”. These Guidelines, which amongst others have been signed by the United Nations Assistance Mission and the International Security Assistance Force, state that the use of “military assets” for “humanitarian relief operations” should only be used if a number of conditions are met including:

- “there is no comparable civilian alternative”;
- “to the extent possible there is civilian control over the operation”;
- “military assets are clearly distinguished from those used for military purposes”.

In a number of areas, the military have undertaken development or humanitarian operations where there are civilian alternatives.

Theme 7: What are the challenges faced by NGOs in engaging in the delivery of a Comprehensive Approach to a particular crisis? How might MoD/UK Government assist NGOs in addressing these challenges?
Covered by Theme 6

Theme 8: What are the challenges faced in moving between different stages of a Comprehensive Approach, for example from stabilisation to reconstruction?
Question not addressed during discussions.

Theme 9: How can local ownership for a Comprehensive Approach be established?
Question not addressed during discussions.

Theme 10: What lessons have been learnt from the application of the Comprehensive Approach in Iraq, Afghanistan or other countries?
NGO 10’s in-country team identified the following key actions required to improve development and stability in Afghanistan:

i) **The International community must make a sincere commitment to state building.** Action is needed to build capacity at national, provincial and district level. The international community’s top down approach, which focuses on national government, will not work on its own.

ii) **Additional support is needed for agriculture.** The subsistence or employment of around 80 per cent of Afghans depends on agriculture, and connected occupations and trades. International support for this sector has been low and relevant Afghan government organisations at a national and local level are under resourced.

iii) **The international community needs to build the capability and professionalism of the Afghan security forces.** The international community has not provided the level of support for the security sector, especially the police, that it had promised.

iv) **Overseas military forces need to change their emphasis.** Rather than tracking down insurgents, the overriding objective of military forces should be protecting local Afghans so that they can get on with their lives.

v) **The international community must get a much better understanding of the Afghan people so that it is better placed to design development and other programmes.**

NGO 10 made the following general observations on the application of the Comprehensive Approach drawing on experience in Afghanistan and other countries:

i) **There is a question over whether the Comprehensive Approach is wrong in principle, or whether the wrong polices have been used to implement the Comprehensive Approach in practice.**

ii) **There can be tension between who should take credit for improvements made, for example, in security and development in the host country when a Comprehensive Approach is adopted.** For example, if the international community in Afghanistan takes credit for development work this can help bolster its support amongst Afghans and the populations of donor and troop contributing countries. However, this
would do little to provide the Afghan government with greater legitimacy, which is a necessary condition for conferring legitimacy on the international forces in the eyes of many Afghans.

**iii) UK Government effort needs to be co-ordinated in a way which does not subordinate the role of development.** In Afghanistan, increasing levels of aid have been ring-fenced and targeted at provinces where international forces are operating at the expense of other provinces. This creates development gaps, which insurgents can exploit, and may even generate perverse incentives. Although the distribution of the UK’s aid is more balanced than that of many other donors, there is no proper system for communicating commitments among donors and with the government in order to ensure that gaps do not occur.

**iv) The Cabinet Office may not have the capacity or expertise to undertake their role of co-ordinating UK Government activity as effectively as is required.** This observation is related to the previous point (under Theme 5) about high turnover of military and civilian staff in Afghanistan, and the corresponding difficulty in building knowledge and expertise.

**v) There can be political pressure for rapid results which can be unhelpful and unachievable.** The political focus on short term results can divert attention away from important longer term projects which aim to build the capability of the host country. The Stabilisation Unit’s new manual on QIPS (Quick Impact Projects) is however seen as pragmatic and realistic.
Appendix I: CARE International UK
Paper prepared by CARE International UK

CARE International UK Submission
Select Committee Inquiry on the Comprehensive Approach

Summary:
From the perspective of CARE International, the Comprehensive Approach (CA) needs to be understood in the broader context of shifts in civil-military relations, peace operations, donor aid policy related to conflict-affected developing countries. The ‘War on Terror’ has introduced new dimensions to longer-term changes in donor and military policy, which promote ‘integrated approaches’ across political, military, and aid strategies. Certain trends appear encouraging - at the level of rhetoric at least, if not implementation. Thus some variants of ‘Comprehensive Approach’ policy discourse in the UK and internationally appear to recognise the need for civilian-led political and reconstruction strategies in post-conflict situations. ‘Lessons identified’, if not ‘lessons learned’, emerging from Iraq and Afghanistan underline the ineffective and counter-productive nature of short-termist, military-dominated approaches to civil-military relations. For others, it is merely a new label for the old-style ways of working.

Different military and government officials maintain quite varied understanding of the term’s definition. For some officials, it implies a new way of operating, which respects and supports civilian leads on tasks associated with stabilisation and reconstruction. For others, it is merely a new label for old-style ways of working. Fundamentally, the CA appears to remain a military-dominated agenda; focusing on narrow and technocratic issues about departmental territoriality and organisational culture. While coherence of government policy is an obvious and important objective, NGOs maintain serious concerns about potential impacts of CA implementation for their operations, and the safety of their staff and beneficiaries. At field level, experience of military operations in Afghanistan suggests that international forces will continue to assert a military pre-eminence in hostile environments in which they are conducting combat operations. This partly reflects both the level of authority delegated to the force commander in-theatre, and the imbalanced spread of resources between military and civilian actors involved. Such an approach threatens the space for NGOs or other agencies to deliver independent, neutral and impartial humanitarian assistance.

Key Recommendations:
- The UK Government should respect the non-governmental and independent character of civil society and specifically NGOs involved in humanitarian assistance in conflict-affected contexts. For this reason, it should not seek to incorporate NGOs into a Comprehensive Approach framework, but rather identify means to enable appropriate and effective dialogue with NGOs on related policy and operational issues.
- The UK Government should invest in NGO capacities and mechanisms to enable effective and appropriate NGO engagement in policy dialogue on issues related to the Comprehensive Approach; trainings and exercises with the military to sensitise them to humanitarian principles; and programmatic learning on effective NGO approaches to civil-military interaction at field level.
The UK Government should ensure that development of the Comprehensive Approach respects the distinct mandate and priorities of the Department for International Development (DFID); in particular in relation to humanitarian action. DFID should be maintained as a government department represented at cabinet-level by a Minister to ensure effective and appropriate coordination, as opposed to subordination, between aid policy and the other relevant line ministries.

UK approaches to the Comprehensive Approach are highly influenced by wider international efforts. For this reason, DFID should invest in strengthening UN humanitarian leadership and coordination structures, in particular UN OCHA. At present, UN OCHA is frequently constrained by inadequate human resources and political backing to effectively engage in coordination with political and military actors on an equal and independent footing.

Comprehensive Approach: Implications for NGOs at field level
NGOs, such as CARE International, deliver life-saving and livelihoods assistance in some of the most insecure and conflict-affected regions of countries like Afghanistan, Somalia and Sri Lanka. That access, often fragile and dynamic, is dependent on the acceptance of local communities and parties to the conflict. Respect of humanitarian principles is central to negotiating such access. Our commitment to humanitarian principles is not inspired by abstract theory, but rather our need to ensure the safety and security of field staff, partners and beneficiaries. In southern Afghanistan, for example, one of CARE’s local partners was approached by Taliban representatives and told: ‘Your aid is good for the local community and may continue. However, if you or the programmes you implement become associated with the NATO forces, then you will make yourselves a target.’

For the above reasons, CARE maintains serious concerns about potential consequences of the Comprehensive Approach for its operations, and the safety of our staff and beneficiaries. An instrumentalist interpretation of the Comprehensive Approach in donor government policy would threaten the space for CARE and other aid agencies to deliver independent, neutral and impartial humanitarian assistance.

At field level, experience of military operations in Afghanistan suggest that international forces continue to assert a military pre-eminence in hostile environments in which they conduct combat operations. This partly reflects both the level of authority delegated to the force commander in-theatre, and the imbalanced spread of resources between military and civilian actors involved. CARE played a leading role in organising recent field research by the BAAG and ENNA networks on civil-military relations in Afghanistan; with a particular focus on experience in Uruzgan and Paktia. That research found that inappropriate associations between the military and some NGOs created security risks for the wider NGO community and local beneficiary populations. It also led to recommendations that military forces should stop instrumentalising NGOs to deliver on their short-term ‘hearts and minds’ activities; and take greater steps to minimise risks incurred through their interactions with civilian agencies. The research indicated that while there has been an expansion in the civilian capacity of NATO Provincial Reconstruction Teams (PRTs) and investment in coordination with the government and other civilian actors, considerable challenges remain. While ‘civilianisation’ of stabilisation efforts may feature high in the rhetoric of policy-makers, it was yet to translate into discernable changes for either Afghan populations or NGOs on the ground at the time of our research.

The BAAG/ENNA research also assessed the mechanisms for civil-military interactions at field level in Afghanistan. A number of NGOs participate in the Afghanistan ‘civil-military

42 Interview, 13 June 2006
43 ‘Aid and civil-military relations in Afghanistan’ BAAG and ENNA Policy Briefing Paper, 2008
relations working-group’, which is chaired by ACBAR in Kabul. The group is attended by donors, UN, NATO ISAF and Coalition representatives. Its objectives are to facilitate dialogue in order to address concerns regarding ‘bad practice’ (e.g. military CIMIC activities that impact negatively on aid programmes), and share information of relevance to NGO safety and security. Critical to the on-going sustainability of this working-group is its careful demarcation as a forum for appropriate dialogue that respects the neutrality of aid agencies. No information can be discussed that could be perceived as alignment or intelligence-sharing with the military. However the group suffers from two major limitations: inconsistent participation from all sides; and failure on the military side to follow-up and implement commitments made. In terms of participation the group has lacked representatives from the national contingents leading the PRTs. Additionally, ISAF participation has normally been limited to the CIMIC unit (CJ9), while most of the issues discussed need participation of representatives from the other branches of ISAF (particularly planners and strategists - CJ5). On the NGO side, many NGOs simply lack the staff capacity to engage in such processes. In terms of concrete results, NGOs express concerns about the limited follow-up on issues raised in the working group. On the military side, this partly reflects the high turn over of personnel and a lack of follow-up within the military hierarchy.

Recommendations:

- The UK Government should respect the non-governmental and independent character of civil society and specifically NGOs involved in humanitarian assistance in conflict-affected contexts. For this reason, it should not seek to incorporate NGOs into a Comprehensive Approach framework, but rather identify means to enable appropriate and effective dialogue with NGOs on related policy and operational issues.
- The UK Government should invest in NGO capacities and mechanisms to enable effective and appropriate NGO engagement in policy dialogue on issues related to the Comprehensive Approach; trainings and exercises with the military to sensitisize them to humanitarian principles; and programmatic learning on effective NGO approaches to civil-military interaction at field level.

Comprehensive Approach: Implications for UK government institutions

Donor deliberations on aid effectiveness have become increasingly preoccupied with ‘whole-of-government approaches’ to coordination between diplomatic, defence and development efforts. In the UK, these debates have focused on implementation of the ‘Comprehensive Approach’ across relevant government departments; in particular the Department for International Development (DFID), Ministry of Defence (MOD), and the Foreign and Commonwealth Office (FCO). Coherence of government policy is an obvious and legitimate objective. For this reason, efforts to promote the Comprehensive Approach have partly focused on narrow and technocratic debates about departmental territoriality and organisational culture in Whitehall. However, the Comprehensive Approach must also be understood in the broader context of shifts in civil-military relations and wider donor policy related to the ‘War on Terror’. Certain trends appear encouraging at the level of rhetoric at least, if not implementation. Thus some variants of policy discourse on the Comprehensive Approach appear to recognise the need for civilian-led political and reconstruction strategies in post-conflict situations. ‘Lessons identified’, if not ‘lessons learned’, emerging from Iraq and Afghanistan have underlined the ineffective nature of short-termist and military-dominated approaches to stabilisation and reconstruction efforts in such contexts. However, for others, the Comprehensive Approach is merely a new label for old ways of working.

In the UK, some commentators have suggested that a Comprehensive Approach could imply that development and humanitarian policy become explicitly subordinated to UK national
security or foreign policy imperatives. This has led some commentators to suggest that DFID should end in its current form as an independent Government department represented at Ministerial level in the Cabinet; and that it becomes incorporated as a sub-department within the Foreign and Commonwealth Office. This would represent a hugely controversial and counter-productive direction for UK policy and practice, reminiscent of changes in US foreign assistance policy under the Bush administration. Under the Bush administration, aid policy became explicitly framed within the US national security strategy. Between 2002 and 2005, total US assistance managed by the Department of Defence (DOD) went from 5.6% to 21.7%, while that managed by USAID fell from 50.2% to 38.8%. This militarisation of US foreign assistance policy is widely perceived as a significant factor in the increased targeting of US-based NGOs by armed groups involved in conflicts around the globe. More recently, policy discourse from the Obama administration indicates that the US may shift towards a more nuanced approach to coordination across development, defence and foreign policy.

CARE, along with other multi-mandate NGOs operating across humanitarian, recovery and development programmes, has widespread experience of the linkages between security and developmental efforts on the ground. Disarmament, demobilisation and reintegration (DDR) programmes provide one example. DDR consists of short-term military components (disarmament and demobilisation) and a long-term development process (reintegration). Failure to adequately link, sequence or resource DDR has led to insecurity (El Salvador, Guatemala, Angola), and even jeopardised peace processes in some instances. However, CARE’s experience in community-based reintegration and rehabilitation efforts, in contexts like the Democratic Republic of Congo and elsewhere, suggests that effective coordination not require integration.

**Recommendation:**
- CARE calls on the UK Government to ensure that development of the Comprehensive Approach respects the specific mandate and priorities of the Department for International Development (DFID); in particular in relation to humanitarian action. DFID should be maintained as a government department represented at cabinet-level by a Minister to ensure effective and appropriate coordination, as opposed to subordination, between aid policy and the other relevant line ministries.

**Comprehensive Approach: Implications for international institutions**
While the Comprehensive Approach has been primarily an intra-governmental agenda, its implications for multilateral institutions are also evident. From CARE’s perspective, one of the most important challenges lies in strengthening the UN’s role in humanitarian coordination. The ability of humanitarian agencies to engage in policy dialogue or coordination with military or political actors depends on functioning humanitarian coordination structures. For this to work, these humanitarian coordination structures, whether UN or non-UN, must be experienced as legitimate from the perspective of operational agencies, such as CARE. At present, it is generally acknowledged that humanitarian leadership and coordination remains one of the most significant challenges in reform of the UN humanitarian system.

Current debates in the UN secretariat on the role of humanitarian coordination in relation to ‘integration’ between political, military and aid strategies are preoccupied by models of ‘structural integration’ versus ‘coherence and strategic partnership’. At present, UN Integrated Missions are headed by the UN Special Representative of the Secretary General (SRSG), who will often also hold the double-hatted role as Resident Coordinator and

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44 “United States (2006), DAC Peer Review: Main Findings and Recommendations.” OECD/DAC. 2006. [http://www.oecd.org/document/27/0,2340,en_2649_201185_37829787_1_1_1_1,00.html](http://www.oecd.org/document/27/0,2340,en_2649_201185_37829787_1_1_1_1,00.html)
Humanitarian Coordinator. This arrangement integrates humanitarian leadership into the mission’s political and military leadership. In some instances, a deputy Deputy-SRSG role has also been established with responsibility for humanitarian affairs, reporting to the SRSG. Advocates of the latter approach argue that it provides for adequate humanitarian coordination capacity, and enables humanitarian influence on the SRSG from inside the mission. At present, there is not one stand-alone UN Humanitarian Coordinator (HC) deployed anywhere worldwide. UN OCHA continues to struggle to deploy adequate capacity to the field-level to support humanitarian coordination efforts in a timely and effective fashion. **As yet, there have been no independent evaluations to verify whether these arrangements have led to any positive outcomes in terms of facilitating humanitarian access.** Humanitarian agencies have frequently criticised current arrangement for [a] politicising humanitarian coordination; and [b] resulting in inadequate capacity for humanitarian coordination as the individual in-question is pulled in several directions.

More recently, the deteriorating situation in Afghanistan has led to the establishment of a new and semi-independent OCHA office in that country. This development is widely perceived as an acknowledgement that total integration of humanitarian affairs into a political and military mission in Afghanistan was not effective or sustainable. While this change is unlikely to make a fundamental difference in how humanitarianism is perceived in Afghanistan in the short-term, it should provide enhanced capacity for humanitarian coordination. With time, this may also result in a better coordinated humanitarian community able to deliver life-saving assistance in a principled and professional fashion.

For the above reasons, CARE believes that international reforms should recognise that effective coordination between aid agencies and political or military actors does not require integration. Particularly in violent contexts, the responsibility for humanitarian coordination should remain outside of political and military mission structures. Military and political missions should not be given mandates or capacities, which duplicate or undermine the remit and efficacy of an independent OCHA, which should serve as the voice and representative of the humanitarian community.

**Recommendation:**

- CARE calls on DFID to invest in strengthening UN humanitarian leadership and coordination structures, in particular UN OCHA. At present, UN OCHA is frequently constrained by inadequate human resources and political backing to effectively engage in coordination with political and military actors on an equal and independent footing.
Appendix J: Tearfund
Paper prepared by Tearfund

Tearfund comments on National Audit Office research to support the House of Commons Defence Committee inquiry into the Comprehensive Approach

Overview and context - To set the scene please provide an overview of your organisation’s involvement in Iraq, Afghanistan or other areas of conflict, and engagement you have with the MOD and/or other UK departments in these conflict zones?

Tearfund is a Christian relief and development agency. We have over 40 years’ experience of working in over sixty countries with local partners and through disaster management teams, supporting them to respond to the needs of local communities and to ensure that governments and international policy-makers listen to the voices of the powerless.

The Disaster Management Teams are currently operational in South Sudan and Darfur, the Democratic Republic of Congo and Afghanistan. Our operational team in Afghanistan has current field bases in Kandahar, Kapisa, Jawzjan and Kabul since 2001 with 9 expatriate and 113 Afghan staff managing projects of up to £2 million. This programme has DFID funding from 2005-2008 for Disaster Risk Reduction work across three provinces and from 2007-2011 for innovations in Water, Sanitation and Hygiene (WASH). In Afghanistan, Tearfund is a leader amongst the humanitarian community in the areas of Community-based Disaster Risk Reduction, household water treatment through BioSand filters and Community Led Total Sanitation.

Tearfund staff have contributed to Mission Training exercises for NATO as Subject Matter Experts for the civilian cells for Regional Command South. Our UK staff have provided an NGO perspective for 3 Commando Brigade, 19 Light Brigade and 11 Light Brigade during study weeks as they prepare to go to Helmand. Our civil focal point has attended the Peace Support Operations week at the Defence Academy in Shrivenham in 2008 and 2009 and contributed to the CIMIC course taught at Longmore Camp with Lt. Col. Dr. Stuart Gordon.

Theme 1. What does your organisation understand by the term the “Comprehensive Approach”?

Tearfund understands the Comprehensive Approach to describe the approach taken by the MOD, DFID and FCO when approaching conflict or post conflict scenarios in which they are involved. The aim of this cross government work is to ensure collaboration and close coordination of HMG objectives, strategies, and activities in the military, development, and diplomatic spheres. The work of the Stabilisation Unit largely contributes to this as well. The work of the MOD within the Comprehensive Approach uses the language of ‘civil effects’ - that is, activities carried out with and for the civilian population and civil society that are in line with the Commanders’ objectives for the mission. These include Quick Impact Projects; “hearts and minds” activities for consent winning, reconstruction of infrastructure and capacity building of government ministries including security sector reform.
Theme 2. Has the MOD and/or other UK Government effectively communicated what it understands by the Comprehensive Approach and the merits of such an approach?

Tearfund is not aware of any formal communication from the UK Government setting out the adoption of this approach. Tearfund’s understanding of the Comprehensive Approach is based simply on being aware of these policy developments due to our membership of various coalition groups: NGO Military Contact Group, BOND Conflict Policy Group and British Agencies in Afghanistan Group (BAAG) etc. The merits of such an approach are little communicated and little evidence has been offered to support them. Tearfund would recommend a more concerted communication by HMG, possibly through DFID, of the benefits of the Comprehensive Approach and how they envisage NGOs and humanitarian agencies are to engage effectively.

Theme 3. Does your organisation see the Comprehensive Approach as an effective way of addressing international crises?

Tearfund recognises that there is a vacuum, especially in settings like Afghanistan, which must be filled by the building of government and political institutions. Addressing this vacuum will require coordinated security, development, and diplomatic work, and is not within the mandate or expertise of humanitarian agencies. At the same time, there is an on-going debate between military and some humanitarian agencies about the appropriate level of security needed for NGOs to operate after the ‘take, hold and develop’ activities of the forces and a more fundamental debate about the appropriateness of NGOs to operate in this way given their commitment in the Red Cross Code of Conduct “not to act as instruments of government foreign policy.” Tearfund believes that the Comprehensive Approach is a valid experiment to address the political process and bridge the gap between insecurity and security in order to create a stable environment in which to conduct humanitarian aid and development activities.

This approach needs to be closely monitored for its effectiveness and the extent to which it could severely impact on the safety, security and independence of humanitarian agencies existing operations. The close coordination of development objectives and strategies with military and diplomatic ones should not mean that humanitarian funding is limited to those areas or populations which are foreign policy priorities for the MOD and FCO. There needs to be an understanding that the aims of the British Government are not necessarily in line with the humanitarian objectives of the NGOs and therefore NGOs will not necessarily follow the military after it has ‘taken and held’ a location. It is imperative that the proponents of the Comprehensive Approach do not see NGOs as ‘force multipliers’ of HMG’s strategy in conflict areas.

Theme 4. Has the MOD and/or the UK Government worked effectively with the international community to adopt a Comprehensive Approach

The FCO has welcomed feedback from the BOND Conflict Policy Group on their strategy regarding the protection of civilians in armed conflict. The MOD involved in Southern Afghanistan have welcomed input into their pre deployment training. However none of this has been communicated as direct involvement in the Comprehensive Approach nor has there been, to our knowledge, a formal launch of the approach. There is an increased drive across government to provide more civilian assistance to post conflict settings in order to strengthen governance and political process with local governments such as the Government of Afghanistan. This has been widely communicated in the media.
Theme 5. Has the MOD and/or the UK Government built the UK’s capacity to engage in a Comprehensive Approach to a crisis? What more could be done?

The UK Government and the MOD specifically have included a lot more civilian personnel in their operations in Helmand in roles such as Political Advisor and Stabilisation Advisors. The Stabilisation Unit accesses its database of Deployable Civilian Experts to fill such positions under the Cabinet Office. However the aims of these posts seem to be very foreign policy and military-led as opposed to being led by the development needs of the populations affected. Tearfund believes it is imperative that DFID be included at every stage of development of the Comprehensive Approach in order to advise the FCO and MOD of the developmental agenda and how this will contribute to a country’s recovery following a conflict.

Theme 6. What are the challenges faced by NGOs engaging in the planning of a Comprehensive Approach to a particular crisis? How might the MOD/UK Government assist NGOs in addressing these challenges?

There is little engagement with NGOs in the planning stages of a Comprehensive Approach outside of the classrooms of Shrivenham. To invite NGOs into the planning of the Comprehensive Approach from the DFID or FCO side would yield positive insights. However it must be remembered that NGOs need to maintain their impartiality. Neutrality is absolutely critical in order to comply with the Red Cross Code of Conduct’s commitment not “to act as instruments of government foreign policy” and to effectively prioritise on the basis of need alone. This does not mean that NGOs cannot have a healthy relationship or dialogue with government / military actors but this is not seen as collaboration or a convergence of similar objectives and opinions on this engagement will vary across the NGO sector. As a result, the most appropriate route for NGOs to engage with the planning of the Comprehensive Approach would be through DFID. There has to date been little outreach from DFID to NGOs regarding this. When planning for a Comprehensive Approach, the differentiation between the foreign policies of HMG, the British and other international forces from the humanitarian agencies at work in similar locations must be understood on all sides. Again, this does not mean that NGOs cannot have a healthy relationship, dialogue, or coordination with government and military actors, but that NGOs must retain independence in selecting the areas and populations with which they work, and that their humanitarian priorities cannot be presumed to converge with the policy priorities of the government (e.g. political stabilisation).

In addition, the Comprehensive Approach plan should not over-estimate the ability of humanitarian agencies to move swiftly into areas which may be considered “stabilised” for purposes of military movement about the area, but in which violence (criminal or low-level insurgent) continues to affect civilians to a significant degree. As most NGOs do not arm themselves and rely largely on their acceptance in communities for protection, their perceptions of security in an area may be very different from HMG personnel who travel armed or under armed escort. Moreover, in cases where NGOs have witnessed the withdrawal of military forces from areas once considered “held,” and the return of those areas to insurgent control, they may rightly hesitate to engage in areas newly declared to be “taken and held.”

Theme 7. What are the challenges faced by NGOs in engaging in the delivery of a Comprehensive Approach to a particular crisis? How might MOD / UK Government assist NGOs in addressing these challenges?

Part of the problem in addressing the different stages of a Comprehensive Approach is that it has not been explained outside of Government what the agreed stages are of the Comprehensive Approach. This makes it difficult to advise on how to overcome the challenges. It is very hard to move from a very military led set of stabilisation activities; physical infrastructural activities, capacity building of political institutions for government, to activities that will be connected to longer term development gains. This is not because such
activities are not also appropriate with peace time activities but that those carrying them out will be very different and their approaches with them. Stabilisation, in a layman’s understanding of it, it about influence, governance, political process, and capacity building institutions of government. As these activities are being done during the Hot Stabilisation period there needs to be close analysis of how they can be tied to longer term development and be sustainably carried out by the people who will remain in the country for a longer time than HMG’s staff. This could be done through the ties made across government departments and the direct capacity building of the human resources in the civil service of the conflict affected country. Providing good management skills to personnel is a key capacity building a country for recovery post conflict.

Humanitarian agencies delivering services in areas of intense conflict such as Afghanistan must take care not to be perceived as parties to the conflict, or to be collaborating with military forces. If NGO work is publicly “claimed” by a government party to the conflict as a sign of stabilisation and victory, the odds sharply increase that the NGO will come under attack and the benefits of its work will be reduced or lost – witness the increase in volume of attacks in 2008 by insurgent forces against NGOs implementing the National Solidarity Programme (NSP) in Afghanistan. Accordingly, humanitarian NGOs whose work coincides with the Comprehensive Approach of the UK Government (and may be funded as part of that Approach) face the primary challenge of differentiating themselves in the eyes of the population from an ongoing military/counter-insurgency campaign. Whether or not HMG considers increased political stabilisation to be a de facto result of humanitarian NGO work (for example through improved health, food security, or income in a given area), that work should never be made a component of an explicit “hearts and minds” campaign, in which infrastructure or other benefits are explicitly claimed as an achievement by one of the parties to the conflict. HMG can assist NGOs by recognizing this differentiation and adopting a low profile approach to monitoring and publicizing NGO projects in conflict areas.

General insecurity is another challenge, in areas where criminality and insurgent activity pose a risk of violence to anyone, regardless of perceived affiliation. HMG can continue to assist by accepting the necessary security measures in NGO project budgets (e.g. staff specifically tasked with security management and analysis; employee training in security management and personal security; increased travel costs due to flights rather than road travel; communications costs such as additional satellite phones and radios; compound security measures such as blast film and razor wire; ballistic blankets and in some cases armour for project vehicles).

**Theme 8. What are the challenges faced in moving between different stages of a Comprehensive Approach, for example from stabilisation to reconstruction?**

It is very difficult for an agency such as Tearfund to advise on these challenges when those outside of Government have not been made fully aware of the different stages specified as constituting the Comprehensive Approach. It is very hard to move from a very military-led set of stabilisation activities (e.g. physical infrastructure and the capacity building of political institutions for government) to activities that will be connected to longer term development gains. This is not because such activities are irrelevant in peace time, but because those carrying them out will be very different and vary in their approaches. As many activities are being carried out during the Hot Stabilisation period, there needs to be close analysis of how they can be tied to longer term development and be sustainably carried out by the people who will remain in the conflict affected country for a longer time than HMG’s staff. This could be done through the ties made across the host government departments and the direct capacity building of the human resources in the civil service of the conflict affected country. Providing good management skills to personnel is a key capacity building a country for recovery post conflict.
Theme 9. How can local ownership for a Comprehensive Approach be established?

In order to garner local ownership for a comprehensive approach in crisis situations there needs to be a clear explanation of the merits of the approach. The primacy of a military operation must be acknowledged as having serious limitations when it comes to rebuilding a society immediately after conflict or even during the ‘Hot Stabilisation’ period. The benefits of addressing indigenous ways of organising communities (for example through Shuras in Afghanistan), addressing reconciliation and district level governance need to be acknowledged, engaged, strengthened and used by HMG Stabilisation actors in order for the Comprehensive Approach to be valued, understood and owned locally. Greater input into the domestic security forces of police and legal institutions is needed further to the development of local armed forces. The value of developing and capacity building civil servants to run the conflict affected countries can be addressed by the Comprehensive Approach but there must be permission of those nations to design systems and institutions that are suitable for them not simply a mirror image of the UK.

Better communication is needed regarding the purpose and benefits of HMG strategy to be targeted at both local governments, down to the lowest district/provincial level, and at other civil society actors including the humanitarian aid community. There will be inherent difficulties in promoting this approach as for example the civilian casualties caused by a military operation are carried out by the same government that is providing reconstruction and development through the comprehensive approach. The local population needs to believe that HMG’s involvement is for their good, their protection and the improvement of their daily lives. If this is not actually the case, or is perceived not to be the case then local ownership of the approach as a whole will be unlikely.

Theme 10. What lessons have been learnt from the application of the Comprehensive Approach in Iraq, Afghanistan or other countries?

It is difficult for an NGO to comment on anything learnt by government but we would encourage some research into this. A sharing of those lessons would also be welcome as the approach continues to be used and developed in areas of conflict. As an NGO engaged in disaster response, Tearfund has learnt the importance of dialogue with the military forces operating in the same environment in order to explain our organisation’s mandate, our manner of working and how the work of the military and stabilisation impacts this.
Summary:

This paper seeks to provide written responses to each of the questions put forward by the National Audit Office’s enquiry into the Comprehensive Approach on behalf of the Defence Select Committee.

Examples from War Child’s experience in the field, complimented with references from key elements of the relevant body of literature are presented.

In summary, it is War Child’s view that the Comprehensive Approach is not currently effective, and that its development is confined by the dominant military agenda that underlies it. Recommendations are suggested to address this.

Overview and context

War Child is an international award winning charity that has worked for over 15 years to help protect children, realise their rights and rebuild their lives in conflict and post conflict situations.

War Child has previously delivered major humanitarian projects, primarily emergency feeding, in Bosnia, Iraq and Afghanistan. Our focus is now on building a protective environment for marginalised children in some of the worst conflict affected countries, including Afghanistan, DRC, Uganda and Iraq, where we remain the only international child protection organisation in the south of that country. In addition, War Child has experience of operating in Palestine, East Timor, Sierra Leone, Liberia, and Rwanda.

War Child is also part of the War Child International family, which collaborates on projects to maximise the benefit of our collective efforts for children living with the effects of war. War Child International currently operates in Sudan and Sri Lanka.

War Child UK has worked in Iraq since 2003 in Thi Qar and Basrah, and in Afghanistan since 2001 in Herat.

War Child works with some of the most marginalised people in these countries - children who are affected simultaneously by insecurity, extreme poverty and social exclusion. They are often overlooked and hard to reach. They include street children, children in prison, child soldiers and child mothers.
“The recruitment of children as suicide bombers is an increasing threat and often involves significant cajoling and trickery. UNICEF indicates that children as young as six have been recruited to carry out such attacks. Many of these children are from destitute families in volatile regions of the country and are more easily persuaded to join the insurgents for protection.”

It is children like this that War Child is working with in Iraq.

Our work, however, is not limited to working with children. We work with families, local government, national ministries, the judiciary, the police, the education system, local religious organisations and local community based organisations as well as with other NGOs. It is through the relationships we build with these groups as well as with the local staff we employ in these locations that we have a deep understanding of the context on the ground, the needs and views of communities, their local structures and cultures.

We also work closely with DFID and the FCO, both of which have funded work in Afghanistan and DRC respectively. We have liaised with the MOD directly and via the Humanitarian Office for Coordination in Kuwait.

Theme 1: From a UK perspective, what does your organisation understand by the term “Comprehensive Approach”?  

War Child understands that the Comprehensive Approach refers to an integrated approach across relevant government, public and possibly private sector and/or non-governmental agencies for the purpose of assessing, planning and implementing crisis management and peace support operations.

War Child understands that its primary elements:

- Political
- Economic
- Military
- and Humanitarian

We understand that this is currently being driven by the MOD. This clearly implies a dominant military agenda, which reflects War Child’s experiences on the ground.

Theme 2: Has the MOD and/or the UK Government effectively communicated what it understands by the Comprehensive Approach and the merits of such an approach?

No.

War Child operates in both Iraq and Afghanistan, as well as in DRC and Uganda. We routinely work through civil-military liaison organs. Our staff have worked in numerous conflict and post conflict environments, including Kosovo, Bosnia, Gaza, East Timor, Sierra Leone, Sri Lanka, Liberia, Rwanda and so on. Our advocacy team works closely with UK Government departments as well as with politicians. However, no staff member has heard of the Comprehensive Approach.

In seeking to understand what the Comprehensive Approach is, the primary source documents we found were:
The Joint Discussion note 4/05, Jan 2006, promulgated as directed by the Chiefs of Staff. The definition of the Comprehensive Approach provided by this document is, at best, vague and open to a variety of interpretations. As a means of communicating the concept it is poorly written and has very little substance.

The Stabilisation Unit’s “core script” on the Comprehensive Approach. This paper scopes out a clearer purpose, with a focus on joined up planning. However, it is not a paper that would be accessible unless a specific search was being made on the Comprehensive Approach. In other words, you would have to know about the Comprehensive Approach before being able to have found this paper.

Both documents are very limited in terms of communicating the merits of a Comprehensive Approach:

- There is no reference to evidence, success or failures, or even an example of how the Comprehensive Approach has or might be employed in practice.

- There are huge gaps, including:
  - how the Comprehensive Approach might be used to prevent conflict occurring in the first place
  - the duration of commitment of the Comprehensive Approach

- There is no consideration of a cross-government capability to deliver it.

- There is only a limited assessment regarding the status of its development as a concept and the challenges to its practical implementation.

A brief online search yielded a wider, specialist narrative on the Comprehensive Approach, such as conference reports and official military documents, which provided a fragmented body of literature. This body of literature presents significant inconsistencies regarding the definition and purpose of the Comprehensive Approach, which raise serious concerns for its humanitarian intentions on the one hand, and the transparency of interests underlying its use in any given situation on the other.

So, there does not appear to have been any substantive effort by the MOD and/or UK Government to communicate the concept of the Comprehensive Approach, the status of its development, an acknowledgement of current limitations and/or gaps in its understanding to anyone other than some internal stakeholders.

Theme 3: Does your organisation see the Comprehensive Approach as an effective way of addressing international crises?

There are potentially several very significant positives that might be gained through the use of a Comprehensive Approach in addressing international crises:

- It recognises the links between humanitarian/development, political and economic issues to security.

- It creates improved conditions for a more inclusive consultation of key stakeholders in a way that could make an intervention more responsive to the needs of civilians on the ground.
It improves the potential for having clearer and more transparent objectives for an intervention, which would enable non-state actors such as NGOs to more effectively position themselves with regard to humanitarian, development and advocacy needs, while having been explicit about intent the MOD and/or UK Government could be more robustly held to account.

It creates the possibility of a civilian led intervention with military elements, rather than an intervention that is defined and led primarily on military terms.

It presents the opportunity to establish the conditions in which conflict can be prevented through the use of economic and political assets alongside the option of military force in supporting governments which legitimately and to the best of their capability represent the interests of civilians, but which are at risk of coups, insurgencies or rebellion (see the work of Paul Collier in War, Guns & Votes: Democracy in Dangerous Places, 2009, Bodley Head).

However, according to Para 103 of the Joint Discussion note 4/05, “the CA is a conceptual framework which could be used to reinvigorate the existing, Cabinet Office-led approach to coordinating the objectives and activities of Government Departments in identifying, analysing, planning and executing national responses to complex situations.” It is therefore by definition a whole government approach and so is inherently politically motivated. This is inevitable and necessary. However, International Humanitarian Law dictates that humanitarian assistance, which is currently seen as an element of the Comprehensive Approach, should be given regardless of the political affiliation of a person, their ethnicity, religion and so on. So while there may be alignment with humanitarian objectives from time to time, the delivery of humanitarian action cannot remain independent of government policy wherever it falls within the scope of the Comprehensive Approach.

If humanitarian action is sourced in a “whole government” owned strategy and subsequently delivered through a Comprehensive Approach then it is not impartial. Consequently, the humanitarian delivery agents will not be perceived to be neutral within a conflict or post-conflict situation.

Furthermore, the Comprehensive Approach is established within the Joint Discussion Document as the “more extensive employment of the Effects Based Approach”, that is, its military aspect. The Comprehensive Approach is, therefore, fundamentally seen through a military lens and driven by a military agenda.

Four examples of a military dominance within the comprehensive approach are given in boxes:

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Language use and misuse is at the heart of much of the confusion surrounding civil-military relations. During the Kosovo crisis, NATO’s Chief Press Officer made reference to “humanitarian bombing” and a “humanitarian war”. War Child believe that the term “humanitarian” should not be used to describe any military operations.

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The Effects Based Approach is defined as the “the way of thinking and specific processes that, together, enable the integration and effectiveness of the military contribution within a Comprehensive Approach”.

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Military sources close to War Child have stated that senior military personnel are referring to the campaign in Iraq as the “British defeat in Iraq”, indicating two things:

1. The comprehensive approach has failed.
2. Couching the description in the language of defeat (and by default, victory) is not consistent with the Stabilisation Unit’s paper on the Comprehensive Approach.

ISAF have recently been distributing teddy bears to the local population (via kindergartens, children’s centres and orphanages) in Herat, Western Afghanistan, which feature the ISAF logo and words along the lines of “caring for the Afghan people”. This attempt to behave as an NGO and encourage goodwill amongst the community following military action is hugely detrimental to War Child and other NGOs. The lack of distinction between NGOs and the military is likely to occur amongst ordinary people, which will result in lack of goodwill, lack of trust and lack of security of NGOs.

Within the frame of a military agenda, the Comprehensive Approach has been neither able to deliver aid in the volumes required nor without shaping it according to military and political interests:

- Since 2001, $25 billion has been spent in Afghanistan building local security forces. An equal amount was pledged in aid but only $15 billion has been delivered. Of that $15 billion, 40% has flowed back to the donor countries through contractors and other foreign staff. In the mean time, the security situation continues to deteriorate.

- Much of the money ‘follows the conflict’, It is disbursed in areas where the conflict is fiercest, suggesting it is being used to achieve military and political aims rather than the humanitarian or development needs of people.

- Because much of the aid flow into Afghanistan is tied to a military two-thirds of assistance bypasses the Afghan government, which raises serious question marks over the timing of efforts to support the establishment of an elected government.

- Consequently, there is poor donor coordination and communication, and so the Afghan government does not know how 1/3 of the aid disbursed since 2001 - $5 billion - has actually been spent. This brings into question accountability to Afghan civilians as well as to the western, tax-paying public.

ACBAR, Aid Effectiveness in Afghanistan, 2008
Because humanitarian assistance delivered within the Comprehensive Approach has an inherently political basis (not least as a result of the military drivers) its delivery will be subject to partiality, and there will be a lack of neutrality on the ground. Consequently, there are significant implications for:

- Access to those civilians who require humanitarian assistance.
- The space independent humanitarian actors have to operate within, as defined by the parameters of impartiality, neutrality and independence and, therefore, capability to deliver.
- The security of independent humanitarian agencies as a result of humanitarian actions being perceived as non-neutral.

This leads to a number of unanswered questions:

- Where does the military role start and end within a Comprehensive Approach?
- How does the military role relate to the humanitarian role?
- How are local actors/NGOs involved in a Comprehensive Approach, and how are prospective beneficiaries able to input?
- Are all agencies/actors “in-theatre” perceived as assets within the Comprehensive Approach and, if so, what does this mean for the delivery of humanitarian assistance to the very people who need it?
- How can the integrity of “campaign authority” within the Comprehensive Approach be maintained given the dominance of the Effects Based Approach?
- To what extent are military actors able and/or willing to work with other actors toward a common humanitarian language that does not utilise or spin alternative meanings in order to cloak the negative consequences of military actions, or service an agenda that is not always reconcilable with humanitarian work?

These are all questions which need answering in the planning phase of a Comprehensive Approach for a specific crisis and then reviewing throughout the delivery of it. Full transparency regarding the answers to these questions will be vital to ensure that the purpose of a Comprehensive Approach is fully understood and so that the key actors can be held to account for it. It is on this basis that more effective coordination with independent actors will be enabled and its legitimacy more deeply rooted among civilians. And so finding the answers to these questions must involve the consultation of civilians, their organisations and NGOs.

In the mean time, within the frame of a Comprehensive Approach people are perceived as objects, the vessels of attitude and motivation, the holders of hearts and minds, allies or enemies. They are not perceived, as they would be through an impartial humanitarian lens,

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Campaign Authority is “an amalgam of 4 interdependent factors: the perceived legitimacy of the international mandate; the perceived legitimacy of the authority of those conducting operations; the degree to which factions, local populations and other actors subjugate themselves to the authority of those conducting operations; and the degree to which the activities of those conducting operations meet the expectations of factions, local populations and others”. Joint Discussion Note 4/05.
as human beings with rights, the actual subjects of a humanitarian intervention. Consequently, within the four primary elements of the Comprehensive Approach - political, economic, military and humanitarian - the humanitarian needs of people play a muted fourth fiddle.

Thus, humanitarian action is likely to serve the political, economic and military objectives of foreign policy rather than the requirements of international law, especially international humanitarian law. This closes the loop in a way that creates a partial, non-neutral frame for humanitarian assistance that is not always in the interests of those who need help.

**Humanitarian assistance is one of the St Petersburg Tasks that form the mandate of the EU’s Rapid Reaction Force. There are major concerns about the effectiveness of humanitarian assistance when delivered by the military within the frame of a Comprehensive Approach. For example:**

- **Aid delivered by the military is often short term and unsustainable.** For example, during the Rwandan crisis British forces established an army field hospital which was open for only six weeks, which they demolished during a serious Shigella outbreak.

- **Also during the Rwandan crisis, the RAF quoted cargo rates for the transport of humanitarian supplies six times higher than those of a civilian airline.**

- **In Afghanistan, the US Army spent $40m on food airdrops weighing 6,000 tonnes, equivalent to $7.50 per Kg. This compared with the World Food Programme’s average of $0.20 per Kg.**

- **Also in Afghanistan, the food packets air dropped by the US military were the same colour as cluster bombs, which they also dropped in over 235 locations.**

- **Most armies are not equipped to provide health services for civilians.** They are geared up to provide medical care to a predominantly male, adult, healthy population. However, 80% of all displaced people are women and children.

  *Jane Barry with Anna Jefferys, Jan 2002, HPN Network Paper, Overseas Development Institute*

It is worth noting that humanitarian aid is not limited to food drops and field hospitals. It has crucial social elements that are linked to both food security and health, but which are also wider in scope such as child protection and transitional justice. Neither the army nor DFID have this type of expertise. For an NGO to do this work under the auspices of a Comprehensive Approach would create challenges of access, security and the actual humanitarian space required to ensure all the civilians in need were assisted regardless of their ethnicity, religion, age or gender.

Humanitarian assistance delivered through a Comprehensive Approach diverts funds away from the established humanitarian aid architecture. This prevents independent humanitarian actors from doing their job effectively and so establishes the conditions in
which they will fail. Consequently, a pretext is provided for humanitarian assistance to be delivered through a Comprehensive Approach (rather than through independent humanitarian actors) and the shaping of it by political and military interests.

For example, in Kosovo only 3.5% of total funding from the top six EU contributors went to UNHCR. In overstepping UNHCR’s mandate and bypassing UNHCR’s role as coordinator, governments unilaterally (and through NATO) started to run the humanitarian operation.

Schenkenberg, E. Sept 2001, NGOs must seriously reflect on their roles following the Kosovo refugee crisis. Focus: Balkans. www.oneworld.org/voice/crisis.html

Finally, whenever military actors are involved in the delivery of humanitarian assistance, very little effort is made to learn and evaluate effectiveness.

For example, feedback from field staff on NATO’s Response Force involvement in the response to the Pakistan earthquake raised concerns “about mission creep which occurred with NATO contingents getting involved …. in rehabilitation and other longer term programmes, which could have been led by civilian agencies. The NATO deployment also became politically controversial in Pakistan; leading to the expedited withdrawal of NATO troops. To date, no surveys have been conducted to assess the implications of NATO involvement in the flood response for perceptions of International NGOs, longer term rehabilitation assistance and humanitarian space. Furthermore, despite the wider investment in “humanitarian reform”, policy makers also appear deaf to proposals that donor nations might resource alternative civilian options for providing such air-lift capacity.”

NGO Seminar on Civil-Military Relations, February 2008, VOICE

Theme 4: Has the MoD and/or UK Government worked effectively with the international community to adopt a Comprehensive Approach?

In the Joint Discussion Document and the Stabilisation Unit’s paper on the Comprehensive Approach there is no consideration of how adopting the Comprehensive Approach will require the buy-in and commitment, as well as capability development among other nations, not least NATO and EU member states.

As a consequence, there appear to be significant inconsistencies across a variety of key international actors.

For example, the US military’s Army Modernisation Strategy establishes the Comprehensive Approach as a means of ensuring full spectrum dominance. This can be reasonably interpreted as total victory (see p.12 of http://downloads.army.mil/docs/08modplan/Army_Mod_Strat_2008.pdf), which is not consistent with statements by the UK Government’s Stabilisation Unit core script on the Comprehensive Approach:
This leads to a cloaking of vying interests and creates distrust, conflicting interpretations of key terms and inevitably, a lack of coordination with regard to humanitarian activity. Consequently, humanitarian activities become even more vulnerable to exploitation by political and military requirements, threatening the core parameters of humanitarian space, not least impartiality and neutrality.

This has been starkly illustrated during the course of 2008 in Afghanistan where the consequences of military activities on civilians do not appear to have been considered as a particular factor in working effectively across the international community’s efforts.

High levels of civilian casualties undermine the achievement of the objectives and/or strategic aim of the Comprehensive Approach. With this in mind, neither the MOD nor any other element of the UK Government in Afghanistan has sought to monitor the excess mortality of Afghan civilians as a result of the occupation, nor has this been championed as a necessity to ensure informed policy and decision making within the delivery of the Comprehensive Approach in Afghanistan. Therefore, there have only been limited efforts to mitigate the consequences of military activity on civilians across the international community, which challenges the local perception of legitimacy and so undermines the Campaign Authority element of the Comprehensive Approach:

- “…it is virtually impossible to get a clear and uncontested account of Afghan civilian deaths….No organisation has undertaken sustained and consistent data gathering and presentation, and so there is no agreed authoritative record, nor any widely respected body able to authenticate future claims to such authority.”

- “UNAMA Human Rights recorded a total of 2118 civilian casualties between 01 January and 31 December 2008. This figure represents an increase of almost 40% on the 1523 civilian deaths recorded in the year of 2007. The 2008 civilian death toll is thus the highest of any year since the end of major hostilities which resulted in the demise of the Taliban regime at the end of 2001. Of the 2118 casualties reported in 2008, 1160 (55%) were attributed to antigovernment elements (AGEs) and 828 (39%) to pro-government forces. The remaining 130 (6%) could not be attributed to any of the conflicting parties since, for example, some civilians died as a result of cross-fire or were killed by unexploded ordinance.”

- “In 2007 Afghan security forces and IMF [International Military Forces] supporting the Government in Afghanistan were responsible for 629 (or 41%) of the total civilian casualties recorded. At around 39% of total civilian casualties, the relative proportion of deaths attributed to pro-government forces remained relatively stable for 2008. However, at 828, the actual number of recorded noncombatant deaths caused by pro-government forces amounts to a 31% increase over the deaths recorded in 2007. This...”

increase occurred notwithstanding various measures introduced by the IMF to reduce the impact of the war on civilians.”

Theme 5: Has the MOD and/or the UK Government built the UK’s capacity to engage in a Comprehensive Approach to a crisis? What more could be done?

No

Because:

- A truly comprehensive civilian agency is not in place nor capable of leading the planning or delivery of a Comprehensive Approach.
- The lack of DFID’s institutional muscle to influence outcomes in a Comprehensive Approach. If DFID were to be made a part of the FCO this would have catastrophic consequences for the department’s capability to champion the importance of humanitarian development issues outside a military agenda, thereby significantly limiting the scope of a Comprehensive Approach.
- Of the limiting attitude of the military.

For example, Lieutenant General Sir John Kiszely, Director of the UK Defence Academy and, therefore, ultimately responsible for the training of all military personnel, limited the purpose of a Comprehensive Approach to “driving a wedge between the insurgent and the people”.


- The focus on crisis management only and not prevention, or post-crisis follow up.
- Lack of capability to consult and genuinely enrol the support of local stakeholders.
- Inadequate commitment of humanitarian resources.

Theme 6: What are the challenges faced by NGOs in engaging in the planning of a Comprehensive Approach to a particular crisis? How might the MOD/UK Government assist NGOs in addressing these challenges?

The current decision making architecture utilised throughout the Comprehensive Approach is very difficult to penetrate. Therefore, the potential of NGOs to influence the planning of the Comprehensive Approach is negligible.

For example, the federal and decentralised structure of NATO operations in places like Afghanistan means that trying to engage in planning is challenging and often fragmented. “Many of the fundamental questions regarding civil military interaction in Afghanistan, like the military’s involvement in development and reconstruction activities, are decided upon at a political level. Debates between NGOs and junior military staff and policy makers at the working-group level have little impact on these decisions.” This massively constrains NGOs ability to engage in planning.

50 NGO Seminar On Civil-Military Relations. Feb, 2008. VOICE
Even where NGOs are able to engage with planning processes, it is rarely a meaningful exercise and can be obscured by vested military interests.

For example, without exception every meeting held by War Child staff with ISAF on security trends in Afghanistan have been on a one to one basis, in order to promote confidence, candour and transparency. In all cases, including during 2008, War Child was specifically told that the security situation in Afghanistan was improving. This calls into question the point of actually seeking to use resources in engaging the planning process in a comprehensive approach if it is going to be predicated by the avoidance of vital facts for the purpose of portraying a more positive situation than actually exists. It also undermines confidence in the integrity of information shared.

Theme 7: What are the challenges faced by NGOs in engaging in the delivery of a Comprehensive Approach to a particular crisis? How might the MOD/UK Government assist NGOs in addressing these challenges?

Because NGOs are unable to influence the planning of a Comprehensive Approach, the effects on delivery are likely to be catastrophic.

Although NGOs are, for the most part, the primary champions of civilian consultation, inclusion and rights - the escalation in the number of deaths, kidnappings and intimidation of humanitarian workers, has massively affected humanitarian access to large numbers of people in Afghanistan thereby compounding existing challenges to civilians. This is a huge problem to NGOs and is, in part, attributable to their perceived and sometimes actual engagement with the Comprehensive Approach.

In Afghanistan, the Comprehensive Approach is led by military interests and objectives. It is not, therefore, balanced, based on the needs of local civilian populations, and so lacks legitimacy in the eyes of Afghans. Consequently, security continues to deteriorate nationally.

Human Rights Watch raises “concerns as to whether the attacking forces acted in accordance with their obligation under the laws of war to exercise ‘constant care to spare the civilian population’ and take ‘all feasible precautions’ to minimize loss of civilian life.”

“There has been a massive and unprecedented surge in the use of airpower in Afghanistan in 2008. In response to increased insurgent activity, twice as many tons of bombs were dropped in 2007 than in 2006. In 2008, the pace has increased: in the months of June and July alone the US dropped approximately as much as it did in all of 2006. Without improvements in planning, intelligence, targeting, and identifying civilian populations, the massive use of airpower in Afghanistan will continue to lead to unacceptably high civilian casualties.”

51 Aid agencies have long criticised Western troops in Afghanistan and Iraq for carrying out small development projects, “blurring the lines” between military and humanitarian actors. For instance, the Taliban issued a statement after killing four aid workers in Afghanistan on August 13th (2008), accusing them of working for “foreign invader forces”. An article by Humanitarian Relief on a report by the centre for International Cooperation and the Overseas Development Institute (see http://humanitarianrelief.change.org/blog/view/attacks_against_aid_workers)
“NATO lawyers involved in investigating? airstrike told Human Rights Watch that in some TIC [Troops in Contact] situations in which airstrikes have been called in, US and NATO forces did not know who was in the area they were bombing. Civilian casualties increase when forces on the ground do not have a clear picture of the location and number of combatants and civilians in an area. Such gaps in knowledge, when combined with fear and the ‘fog of war’ at times mean that forces resort to airstrikes when options less likely to cause civilian loss are available.”

“Air-strikes remain responsible for the largest percentage of civilian deaths attributed to pro-government forces. UNAMA recorded 552 civilian casualties of this nature in 2008. This constitutes 64% of the 828 non-combatant deaths attributed to actions by pro-government forces in 2008, and 26% of all civilians killed, as a result of armed conflict in 2008. Nighttime raids, and ‘force protection incidents’ which sometimes result in death and injury to civilians, are of continuing concern. Also of concern is the transparency and independence of procedures of inquiry into civilian casualties by the Afghan Government and the IMF [International Military Forces] …and the placement of military bases in urban and other areas with high concentrations of civilians which have subsequently become targets of insurgent attacks.”

Troops in Contact: Airstrikes and Civilian Deaths in Afghanistan.
Human Rights Watch, 2008

The delivery of NGOs’ humanitarian and development efforts are greatly compromised in Iraq due to the lack of funding available. This has been acknowledged by several members of a coalition of NGOs who work together to advocate for Iraq. A recent War Child Iraq Appeal provides an example of how War Child believes the current weak Comprehensive Approach in Iraq has affected our funding. Our appeal was launched to raise money for children affected by the war in Iraq. Despite having a significant communication campaign\(^{52}\) we only raised tiny amount of money from the public. We believe that the dominance of MOD messages in the media could have contributed to this. In addition to government messaging about the urgency of military operation, if DFID had given equal priority to communicating the reality for civilians on the ground - their poverty, displacement, lack of access to basic services, etc, the public may have been persuaded that the need to donate to children in Iraq was important.

Aid provided to fragile states rarely lasts long enough to help stabilise a country/region after conflict. Development investment is not always forthcoming due to the fear that conflict will resume or that conflict is universal. This is known as the conflict trap - the less development, the more chance of conflict.\(^{53}\) Similarly, the higher the chance of conflict, the lower the chance of development. The huge resource gap for post-conflict situations affects many NGOs, including War Child.

When NGOs apply for funding, we are asked to provide evidence of the problems we describe. There is a dearth of data about communities in conflict locations, partly because of security issues but also due to a lack of commitment to invest in obtaining it. This gap in information affects not only War Child’s ability to raise much needed money, but also the understanding and acknowledgement of specific issues on the ground. These combined issues have a significant affect on the delivery of humanitarian and development programmes.

\(^{52}\) through gigs hosted by high profile celebrities, national TV advertising and radio coverage across Europe
\(^{53}\) For example see Collier, The Bottom Billion.
The stabilisation unit’s description of the Comprehensive Approach mentions the need for “state-building” A NATO article acknowledges this and the need for building institutions including the judiciary and police.

“Experience in Afghanistan and the Balkans has demonstrated the importance of contributing to the International Community’s Comprehensive Approach for the success of operations, which are increasingly of an integrated civilian-military character. NATO is therefore trying to build closer partnerships with other international organizations that have experience and skills in areas such as institution building, development, governance, judiciary and police” (http://www.nato.int/cps/uk/natolive/topics_51633.htm)

The delivery of War Child’s work on the ground in Iraq and Afghanistan is often hindered by the judiciary and police, who are more frequently a cause rather than a solution to the problem. For example War Child’s experience of the weak judiciary in Afghanistan includes witnessing the impunity for perpetrators of child abuse and children being kept in prison alongside adults, often for crimes they have not committed. Similarly War Child has evidence of a weak police. Rather than protecting children, the police in countries including Iraq and Afghanistan often display brutality to street children.

For the UK government to assist NGOs in addressing this problem, there needs to be a greater emphasis on building the capacity of institutions such as the judiciary and police, which would include training on human rights, child rights, juvenile justice, etc.

**Theme 8: What are the challenges faced in moving between different stages of a Comprehensive Approach, for example from stabilisation to reconstruction?**

The primary challenge is that military actors do not know how to do this.

Firstly, the humanitarian sector has learned from decades of experience that stabilisation - relief - reconstruction - rehabilitation - development is not a sequential continuum. These elements are inter-dependent and often occur concurrently.

Secondly, many civilians already have coping strategies with regard to each of these elements. To impose solutions without recognition of this can undermine these often life saving coping strategies. For the most part, military actors take charge, define problems and contrive solutions with little or no consultation. This further undermines the inter-dependence of these elements. Without investment in people and their ability to address their own humanitarian needs, even administer support given to them, dependency will be inevitable and sustainability will not have a chance.

Thirdly, the military agenda which dominates during the conflict/stabilisation elements of a Comprehensive Approach have long term consequences for the way in which humanitarian actors are perceived by civilians, which can create huge challenges to legitimacy, participation and effective aid delivery.

*For example, NGOs were identified as “force extenders” under Operation Enduring Freedom in Afghanistan, which hugely compromised perceptions of NGO neutrality and led to reduced access to civilian populations and a massive increase in security risks in the delivery of humanitarian assistance.*
Fourthly, the way in which assistance is delivered is usually as important as the substance of the assistance itself.

Alice Thomson reporting from Afghanistan in The Telegraph noted that:

“These people don’t just need a few TV dinners that might land on their heads (i.e. air drops). They need water - impossible to drop from the air. They require medicine, but also someone to administer it; oral rehydration tablets for cholera; tents to keep out the snow; vaccination against measles; therapeutic feeding for malnourished babies; millions of blankets. In Herat last winter, 500 children died from hypothermia in temperatures of -25C and that was before the war started.”

Theme 9: How can local ownership of a Comprehensive Approach be established?

The comprehensive Approach is defined in the Joint Discussion document as: Commonly understood principles and collaborative processes that enhance the likelihood of favourable and enduring outcomes within a particular situation.

If the Comprehensive Approach is to be an effective way of addressing international crises for civilian populations, then we have to understand its definition more clearly and ask the following questions.

Who decides:

- What the common principles are?
- Which collaborative processes will enhance the likelihood of favourable and enduring outcomes?
- What the favourable and enduring outcomes should be?
- Who they should benefit?
- When and where the Comprehensive Approach should be used?
- How long it should be employed?

For the most part, civilians are denied a voice in helping to shape these fundamental principles in any given situation where a Comprehensive Approach is used, thereby denying it the traction it needs to gain local legitimacy and support.

In order to enable local influence and ultimately support of a Comprehensive Approach participatory, field based surveys should be undertaken in advance of any military action with civilians, civil society and other key stake holders in order to assess the:

- Costs and benefits
- Likely impact over the short and long term, with particular regard to civilians
- Cultural appropriateness
- Likely levels of support and participation
- Implications for local economic, political or social structures
- Favourable outcome options and who they are likely to benefit
- Strategies that will enable independent, impartial and neutral delivery of humanitarian assistance
- Sustainability
- Potential alternative solutions to military action

Ultimately, the success of a Comprehensive Approach will be defined by the ability to enrol, engage and genuinely work with local stakeholders, and in War Child’s experience,
this will be based on the capability and support of civil society. Without exception, in all the countries War Child has operated civil society has established that it is best placed to engage, franchise and enable the genuine participation of civilians in humanitarian and development programming. Unless there is investment in the conditions to strengthen civil society - locally and internationally - many of the structures through which information, representation and accountability are enabled will remain weak. This will have a knock-on effect on the effectiveness of attempts to promote representation, relevance and governance throughout the course of a crisis intervention and its follow up. Furthermore, civil society organisations are, to varying degrees, independent. Many have the specialised skills required to deliver humanitarian assistance effectively. Limited investment in the conditions required to support civil society, therefore, limits the extent of delivery of impartial humanitarian assistance.

The role that DFID has to play in enabling this is vital. DFID should, therefore, be the primary actor in a UK Government Comprehensive Approach.

Theme 10: What lessons have been learnt from the application of the Comprehensive Approach in Iraq, Afghanistan or other countries?

Based on War Child’s understanding and experiences of working in Iraq and Afghanistan, as well as elsewhere, we are proposing a 16 point plan that might enable the Comprehensive Approach to become effective in addressing international crises:

1. The Comprehensive Approach narrative needs to be realigned with a focus on civilians and their humanitarian and economic needs.

2. It should not be limited to response, but should also be employed in crisis prevention efforts.

3. Wherever the Comprehensive Approach is employed, the overall aim and objectives must be clearly spelled out and comply with International Law and be mandated by the relevant authorities such as the UN.

4. All military actors must be ultimately responsible to a civilian command architecture within a Comprehensive Approach.

5. Military action should only be countenanced if:
   - All peaceful methods of resolution have been exhausted
   - Protection by the controlling authorities have demonstrably failed
   - The overall aim and objectives of the Comprehensive Approach in any intervention must be clearly spelled out, comply with International Law and be mandated by the relevant international authorities such as the UN.
   - There is proportionality to the protection needs of civilians at risk
   - There is accountability to the UN

6. The military should, if at all possible, not get involved in humanitarian aid efforts. If military actors must get involved, this should be in support of a lead civilian agency, where the military stays in the background. Only as a last resort should the military get directly involved in aid delivery, and only if the humanitarian assistance process fails (but not if this is as a result of funds and other resources being diverted from humanitarian agencies to military and other state delivery agents). In such circumstances the military should have a clear plan of what, why, how and the duration their involvement, and a clear strategy to hand over operations at the earliest possible time to the relevant agency.
Clear lines need to be drawn between independent humanitarian actors and those actors which are subject to the mandate of a Comprehensive Approach. On this basis, the criteria for dialogue to promote coordination and, where appropriate, information sharing can be developed and compliance monitored.

The probability of conflict relapse after a military intervention is high and so the Comprehensive Approach must ensure a long term commitment. A Comprehensive Approach would mean that even if the military leave, other relevant government departments would remain active until the location in question is economically, socially and politically stable.

A common language (with commonly shared meanings) must be developed between humanitarian and military actors.

A Comprehensive Approach and its core objectives must mean the same thing to all actors involved within it, especially within multi-lateral initiatives.

A genuinely independent monitoring and evaluation capability must be established to evaluate and bear witness to the effects of military actions on civilians and the delivery of humanitarian assistance (directly or indirectly) within a Comprehensive Approach.

Official monitoring and publication of the primary impact of the Comprehensive Approach must be undertaken. This must include surveying excess mortality, and must conform to internationally established epidemiological standards. Vitally, the data in such surveys must be disaggregated by age and gender.

One of the essential ingredients for a successful Comprehensive Approach must be equal power across key UK Government and/or international “departments”. In the UK this would include DFID, MOD and the FCO. DFID does not currently have the mandate to fundamentally influence the planning and delivery of a Comprehensive Approach. A Comprehensive Approach must, therefore, ensure that DFID (and its UN agency equivalents on the international stage) has the institutional muscle to affect outcomes positively.

The Comprehensive Approach needs to be developed as an international norm. In order to be effective it must be adopted internationally, not least by the likes of NATO, the EU, UN and especially by the US.

Investment in the conditions to strengthen civil society, both locally and internationally. This is a vital part of crisis prevention as well as crisis preparedness. This must be undertaken in a way that secures the integrity of civil society’s independence, impartiality and neutrality.

Finally, and crucially, children comprise more than 50% of all people living in failed and fragile states, the countries most vulnerable to the type of crisis that might require a Comprehensive Approach intervention. The status of children is profoundly linked to the status of women.

Research by the likes of the ODI and IDS indicates that children are the primary demographic structure through which poverty is transmitted across generations. Children stunted by malnutrition now, and children unable to go to school now equates to drastically reduced development prospects for a country in years to come. If a Comprehensive Approach is to be successful, therefore, it must be
aligned with the long term conditions required to promote the development of children and women. Otherwise, the likelihood of a crisis relapse during a prolonged post-conflict period will dramatically increase.

This can best be achieved by utilising a rights based framework throughout the planning and delivery narrative of a Comprehensive Approach. Reference to key treaties and conventions, such as Universal Declaration on Human Rights, the UN Convention on the Rights of the Child, UN Convention on the Elimination of All Forms of Discrimination Against Women and so on, will need to be a central part of this narrative. This will provide a deeper human substance to a Comprehensive Approach in a way that makes it more meaningful to both civilian populations as well as to UK tax payers, and is more likely to result in its success thereby providing value for money.