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THE DOSSIER

Gendering Economic Sanctions: Best Practices for the U.K.

By Dr. Max Thompson and Kallie Mitchell





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The views expressed in this article are those of the authors and not an official policy or position of the New Lines Institute.

COVER: Demonstrators in London protest the death of Mahsa Amini in October 2022. Amini was 22 years old, when she was arrested by Iran's Morality Police on dress code violations. She died in custody on Sept. 22, 2022. (Niklas Halle'n / AFP via Getty Images)

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THE DOSSIER - Executive Summary

Gendering Economic Sanctions: Best Practices for the U.K.

By Dr. Max Thompson and Kallie Mitchell

Executive Summary

In recent years, the United Kingdom has used targeted sanctions to support its efforts to accelerate the goals of gender equality. The U.K. Foreign, Commonwealth and Development Office (FCDO) formalized these efforts in its International Women and Girls Strategy 2023-2030, committing to “make use of United Nations and U.K. sanctions regimes, including working with international partners to take direct action against those responsible for conflict-related sexual violence (CRSV) and the trafficking of women and girls.” Given the disproportionate effect that economic sanctions visit on women and girls around the world, the growing use of sanctions to protect women and advance gender equality necessitates a broader discussion of the need to mainstream gender within the U.K. sanctions policy.

The Women, Peace and Security (WPS) agenda presents itself as an important normative and legal framework for all stages of sanctions policy to enhance both the U.K.’s commitment to human rights, including gender equality and LGBTQ+ rights, and its strategic and wider geopolitical interests. Despite the U.K. serving as the “penholder” on WPS at the United Nations since 2000, its economic sanctions policy has not explicitly drawn on WPS as a means of justifying, advocating, diagnosing, and developing sanctions regulations. There also is no formal training or guidance on mainstreaming gender at the Office of Financial Sanctions Implementation (OFSI) or within His Majesty’s Treasury more widely. It is vital that the U.K. ensure its sanctions programs adequately address the unique experiences of women and girls and are effective in accelerating progress toward women’s security and empowerment.

Assessing the four broad areas where U.K. sanctions and gender equality efforts currently intersect (discrimination on the basis of sex, sexual and gender-based violence, LGBTQ+ rights, and the suppression of civil society spaces) reveals little to no formal integration of the four pillars of WPS in the design, implementation, and assessment of U.K. economic sanctions. Through the integration of the WPS agenda within economic sanctions policy, the U.K. will be better equipped to achieve its stated defense and foreign policy commitments to gender equality and positive peace.

Key Takeaways

- Sanctions regulations employed with the intent to prevent sex-based discrimination and to support the rights and participation of women and other marginalized groups should be driven and shaped by robust monitoring and reporting mechanisms that use sex- and age-disaggregated data.
- When developing and applying sanctions in response to sexual and gender-based violence, understanding both the nature and political drivers of that violence enables better protection of vulnerable groups and accelerates progress toward more equitable and inclusive political landscapes globally.
- As a major player in the Commonwealth and a country that has spearheaded LGBTQ+ rights in its foreign policy, the U.K. can and should translate rhetoric into reality by developing LGBTQ+-sensitive economic sanctions. Using the pillars of WPS can help the U.K. develop more specific metrics that call for sanctions to further LGBTQ+ rights.
- Considering the U.K. has readily made connections between gender equality and democracy, sanctions



can be wielded as a tool to protect the political and civic liberties of women and girls and to support civil society organizations as an integral part of the global WPS agenda and of progress toward gender equality.

Recommendations

1. His Majesty's Treasury and the OFSI should integrate the WPS agenda into sanctions design, implementation, and assessment processes.
2. The U.K. government should formalize the use of sanctions to promote accountability for sexual and gender-based violence and the violation of the rights of women and LGBTQ+ persons.
3. The FCDO should work in collaboration with the OFSI to coordinate designation criteria and implementation best practices for sanctions against violators of women's rights.
4. His Majesty's Treasury should lead on specific commitments on WPS and sanctions set out in the Delivery Plan in future iterations of the U.K. WPS National Action Plan (NAP).
5. Sanctions implemented to address sex-based discrimination must engage with local civil society and women's groups.
6. Sanctions in relation to gender-based violence should go beyond CRSV as well as attempt to specify and contextualize the political, military, and/or economic motivations for that violence.
7. The U.K. should use its influence within and outside of the Commonwealth to expand its push for LGBTQ+ rights within sanctions policy and target sanctions in a manner that protects vulnerable groups from backlash.
8. The U.K. should ensure sanctions designed to support civil society and democratic opposition are gender sensitive and consider the agency and needs of women activists and political prisoners.



Introduction

To mark International Women's Day 2023, the U.K. government (HMG) [announced](#) a new sanctions package targeting perpetrators of gender-based violence in Iran, South Sudan, the Central African Republic, and Syria. The package reflects a broader global shift toward the use of thematic economic sanctions to further human and women's rights. In December 2022, the U.K. [had announced sanctions](#) that targeted corrupt political figures, those violating human rights, and – for the first time – perpetrators of conflict-related sexual violence (CRSV). These penalties build on the Magnitsky-style sanctions announced by Foreign Secretary Dominic Raab [in July 2020](#), the first human rights-related sanctions imposed independently by the U.K. outside of the auspices of the United Nations or the European Union.

The use of economic sanctions by the U.K. to punish and/or prevent CRSV necessitates a broader discussion of the need to mainstream gender within HMG's sanctions policy. The press release announcing the December 2022 sanctions referenced the U.K. hosting the 2022 Preventing Sexual Violence in Conflict Initiative (PSVI) Conference. However, it did not reference the U.K.'s commitments under the Women, Peace and Security (WPS) agenda. Whereas the PSVI conference and [policy paper](#) that followed it make clear links between PSVI and WPS, the broader connection has not yet been made between the four pillars of WPS and the U.K.'s shifts toward thematic sanctions to prevent and respond to violations of women's rights and promote the meaningful participation of women and girls in peace and security work.

Although protecting women and other vulnerable groups from CRSV is a vital part of the WPS agenda, this is not its sole focus. WPS rests on four pillars: participation, protection, prevention, and relief and recovery, which are underpinned by gender mainstreaming efforts to integrate gender perspectives into all areas of peace and security work. The agenda seeks to achieve gender equality and recognizes that progress requires that women be included and empowered as equal actors in conflict prevention, management, and resolution. Economic sanctions are one of many tools that governments

may use for conflict management and promoting positive peace. However, the gendered impacts of sanctions are more poorly understood, discussed, and addressed than those of other tools such as mediation or peacebuilding.

Given the unequal effects of economic sanctions on women and girls, as well as the increased use of thematic sanctions to address women's rights, the WPS agenda presents itself as an important normative and legal framework for all stages of sanctions policy. To meet obligations on gender equality, it is vital to ensure that sanctions programs both adequately address the unique experiences of women and girls and effectively accelerate progress toward women's security and empowerment.

There is a significant intersection between the pillars of the WPS agenda and U.K.'s use of sanctions as deterrence and accountability mechanisms for violations of human rights, as well as tools for peace. The assessment of four broad areas where U.K. sanctions and gender equality efforts currently intersect illustrates where future and current sanctions can be made more effective through greater engagement with WPS pillars:

- Ending “discrimination including on the basis of a person's sex”
- Punishing and/or preventing “rape and other forms of sexual and gender-based violence,” such as forced marriage, in multiple countries including several [U.K. WPS focus countries](#)
- Stopping “the systematic use of murder, torture and cruel, inhuman or degrading treatment or punishment” against LGBTQ+ persons
- Countering “repression of civil society” including peaceful demonstrators, students, and the arbitrary detention of political prisoners

Recognition of the value of the WPS agenda as a tool in the design, implementation, and monitoring of economic sanctions is a gap in policy and practice, as well as in academia, that needs to be closed. This report builds on the research and findings of an earlier dossier, [“Gendering Economic Sanctions: Best Practices for the U.S.”](#) Despite the increasing use of economic sanctions to prevent and respond to abuses



and violations of human rights against women, girls, and LGBTQ+ groups, there has been little to no formal integration of the four pillars of WPS into the design, implementation, and assessment of U.K. economic sanctions. By meaningfully engaging with the WPS agenda and integrating its pillars into U.K. sanctions policy – as well as establishing best practices for the use of sanctions to promote women’s rights – the U.K. will be better equipped to advance its commitments to human rights, including gender equality and

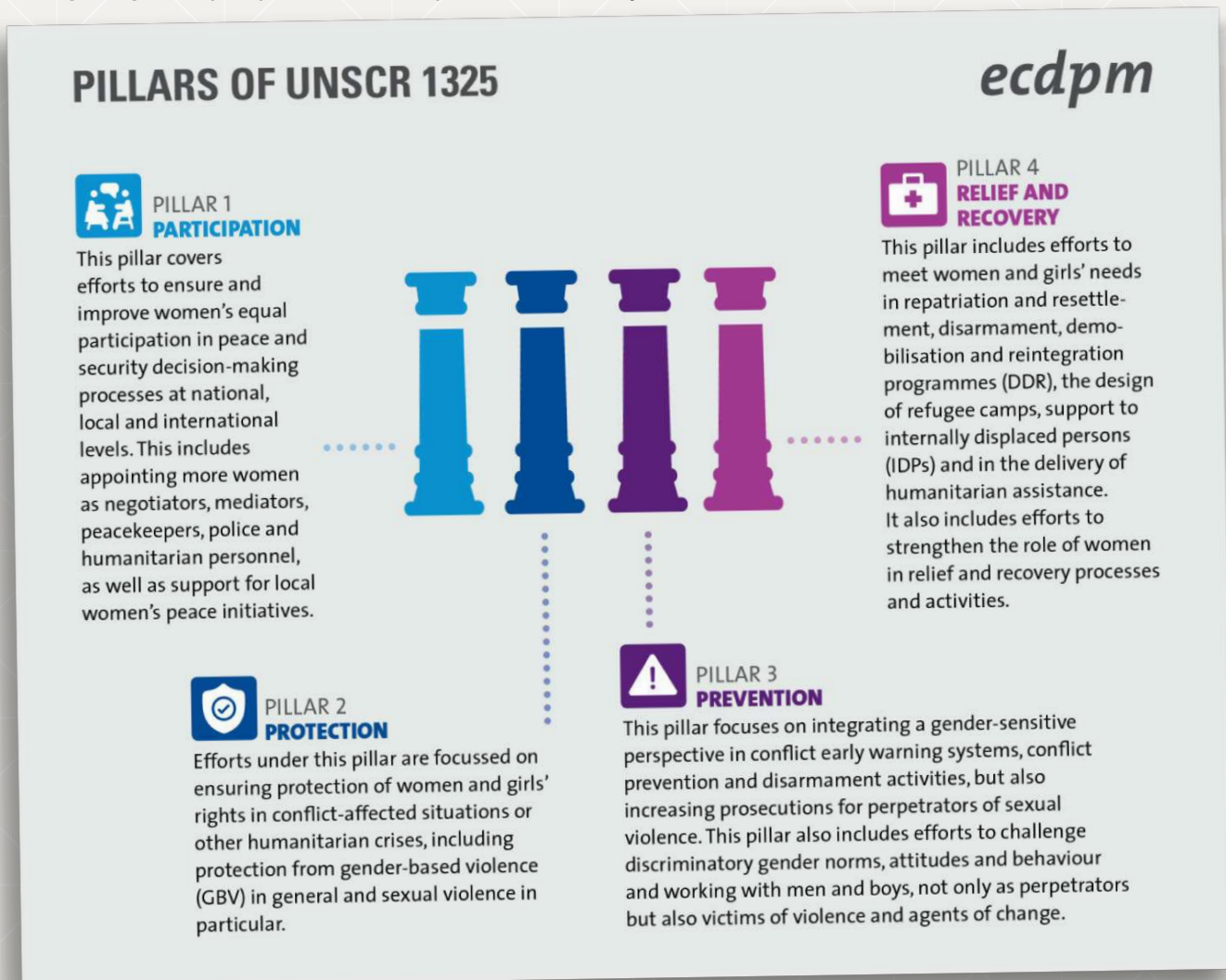
LGBTQ+ rights, as well as its strategic and wider geopolitical interests.

U.K. Economic Sanctions and WPS

U.K. sanctions are [restrictive measures imposed by the government to achieve specific foreign policy or national security objectives](#), administered and enforced by agencies that fall under the Treasury and the Department for Business and Trade. The [2018 Sanctions and Anti-Money Laundering Act](#)

Implementing the WPS Agenda

This chart, from the European Centre for Development Policy Management, illustrates the four key issue areas, or pillars, that compose the WPS Agenda as outlined in UNSCR 1325. The pillars are supported by gender mainstreaming efforts to integrate gender perspectives into all peace and security work.



Source: European Centre for Development Policy Management (ECDPM) [Discussion Paper No. 245: Rhetoric and real progress on the Women, Peace and Security agenda in Africa, Page 8; by Desmidt and Davis]



(Sanctions Act) provides the legal basis for the current U.K. sanctions regime and required the Foreign Commonwealth, and Development Office (FCDO) to publish a report “[Sanctions Regulations Report on Annual Reviews 2021](#),” delineating the purposes of the sanctions regime. In the report’s Ministerial Foreword, Lord (Tariq) Ahmad of Wimbledon, FCDO minister, noted:

These sanctions regimes are not about punishing countries or their populations. They are smart tools allowing the Government to impose both asset freezes and travel bans on specific individuals or entities in order to provide accountability for and deter corruption and serious violations of human rights around the world. Designations under these regimes can also prevent those responsible from entering the U.K. or availing themselves of their assets.

The most significant U.K. department related to sanctions is the Office of Financial Sanctions Implementation (OFSI), which maintains a consolidated list of asset freeze targets. The U.K. has produced a 1,143-page U.K. Sanctions List Publication. This includes agencies and individuals under sanctions for a variety of reasons, including, increasingly, those responsible for human rights violations including murder and torture; rape and sexual violence; arbitrary detention of political prisoners; human trafficking; repression of civil society; and wider corruption and illicit finance.

The FCDO formalized the use of sanctions to protect women in its International Women and Girls Strategy 2023-2030, with the office committing to “make use of U.N. and U.K. sanctions regimes, including working with international partners to take direct action against those responsible for CRSV and the trafficking of women and girls.” Despite this pledge, the U.K. has not explicitly drawn on WPS as a means of justifying, advocating, diagnosing, and developing economic sanctions, and there is no formal training or guidance on mainstreaming gender at the OFSI or within the Treasury more widely. Similarly, statements related to sanctions targeting human rights and women’s rights violations have not referenced the U.K.’s commitments to WPS.

U.K. Women, Peace and Security National Action Plan 2023-2027: Strategic Objectives

The NAP outlines the U.K.’s approach to progressing their commitments to the global WPS agenda. Using the four WPS pillars as “an overarching framework for activity,” the NAP identifies five Strategic Objectives that “reflect U.K. priorities and ways of working.”

Description	Objective
(S01) Decision-Making	Increasing women's meaningful participation, leadership and representation in decision-making processes.
(S02) Gender-Based Violence	Preventing gender-based violence, including conflict-related sexual violence, and supporting survivors to cope, recover, and seek justice.
(S03) Humanitarian and Crisis Response	Supporting the needs of women and girls in crises and ensuring they can participate and lead in responses.
(S04) Security and Justice	Increasing the accountability of security and justice actors to women and girls and ensuring they are responsive to their rights and needs.
(S05) Transnational Threats	Ensuring we respond to the needs of women and girls as part of our approach to transnational threats.

Source: UK Government ([UK Women, Peace and Security National Action Plan 2023-2027](#))

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As a permanent member of the U.N. Security Council and “penholder” of the WPS agenda, the U.K. has served as a leader in drafting and advocating for all 10 Security Council resolutions that constitute the global WPS agenda. The U.K.’s current and historic WPS commitments are set out in five National Action Plans on WPS (2006, 2012, 2014, 2018, and 2023), none of



which explore or reference the intersection of WPS and economic sanctions. In the most recent [2023-2027 NAP](#), then-Foreign Secretary James Cleverly and Secretary of Defence Ben Wallace stated:

The Women, Peace and Security agenda is about building a more representative and effective approach to tackling conflict. It is the right thing to do and the smart thing to do, because empowered and engaged women make societies more prosperous and secure.

Setting out five strategic objectives (SOs), which are measured against the four pillars of the WPS agenda, the 2023 NAP contains several important innovations. It considers a wide range of transnational challenges and had a welcome emphasis on [domestication](#), seeking to enhance women's experiences in the U.K. armed forces and to include a gendered perspective across defense. When it comes to the economic effects of crises, the most recent NAP references "economic recovery priorities" in relation to women's participation in decision-making, "the economic effects of gender-based violence (GBV)," and the importance of "gender-responsive humanitarian programs" that consider socioeconomic harm.

It does not, however, consider sanctions policy or the role of any major sanctions-implementing departments. The FCDO and the Ministry of Defence (MOD) jointly own the NAP, which contains a Delivery Plan that sets out "lead departments" for dozens of commitments that flow out of the U.K. priorities. None of these commitments is owned by His Majesty's Treasury. The five departments referenced are FCDO, MOD, the Home Office, the Ministry of Justice, and the Northern Ireland Executive. The only commitment that tangentially applies to the Treasury is that of "sharing U.K. best practices and expertise with other governments to support global efforts to tackle Violence against Women and Girls," as it is described as "cross-government."

Gender mainstreaming is a central element of the global WPS agenda. It serves as the foundation of the four pillars, requiring policymakers to examine the gendered effects of any public or foreign policy matters. The fifth NAP does not make any specific reference to sanctions policy, but it does talk about

"opportunities across HMG" and ensuring "there is a collective responsibility across government for policy and programming that delivers for women and girls in fragile and conflict-affected contexts." It also references the Conflict, Stability and Security Fund (CSSF) Helpdesk, which is open to all U.K. government staff to provide "high quality, evidence informed analysis and expertise on WPS issues." However, the Treasury is not a lead agency on any of the commitments in the NAP, and the CSSF Helpdesk does not contain a single publication on economic sanctions.

All four pillars of WPS provide guidance on how economic sanctions can enhance U.K. WPS commitments and can be used further in developing, implementing, and monitoring sanctions.

Participation

Five of the 10 U.N. Security Council resolutions that make up the WPS agenda acknowledge that women continue to be underrepresented in all aspects of decision-making and focus on promoting the full and substantive participation of women "[at all decision-making levels ... for the prevention, management, and resolution of conflict](#)," as well as within post-conflict peacebuilding efforts.

In the most recent U.K. NAP on WPS, Strategic Objective 1 (SO1) speaks most clearly to decision-making, seeking to provide direct support to women's and girls' rights organizations and promote the inclusion of women at all levels of decision-making. However, participation underpins the other four SOs, especially SO3, which emphasizes the need for women to participate and lead in humanitarian and crisis response, and SO4, which highlights the significance of women and girls "making decisions about national and subnational security and justice mechanisms and how they are implemented."

When considering sanctions policy, participation includes ensuring engagement with women's and civil society groups, enabling the OFSI to develop sex- and age-disaggregated metrics on women's participation, and taking a broad perspective when considering the implications of sanctions policy.



U.K. Foreign Secretary James Cleverly (front) exits 10 Downing Street in London in March 2023. next to a sign for International Women's Day in London. (Leon Neal / Getty Images)

Protection

As a policy framework, the WPS agenda has trended toward a focus on issues under the protection pillar as [“the most visible and most readily associated concerns related to the agenda.”](#) The U.K. has a long-established PSVI strategy and outlines a series of impressive commitments under SO2 of the NAP that go far beyond CRSV and considers other forms of sexual violence and coercive control, as well as the provision of support to survivors and the well-being of children born of CRSV. Thus far, U.K. human rights sanctions have considered CRSV, trafficking, and forced marriage.

Nevertheless, sanctions regulations of various forms can inflict unintended harm on civilians. When the governments and leaders targeted by sanctions seek to evade, undermine, or mitigate the pressures of those regimes, civilians living under their governance often experience a rollback of human rights and a deterioration of humanitarian conditions as the provision of essential goods and services is disrupted.

In addition, SO5 considers the need for a gendered perspective in all transnational threats and where sanctions are applied to counter corruption and

terrorism, formal consideration to the agency and needs of women and girls should be applied. A holistic understanding of protection, as set out in the NAP, would involve considering the wider gendered effect of both comprehensive and targeted sanctions.

Prevention

The WPS agenda's prevention pillar has been referred to as [“the weakest ‘P,’”](#) [leading to concerns](#) that the agenda is more focused on making conflict safer than it is in preventing it altogether. Economic sanctions policy is an area with boundless potential when considering the prevention pillar of WPS. Sanctions as a tool for conflict management are typically imposed as a means to prohibit violence and limit escalation rather than to punish those already engaged in fighting. The prevention pillar, [“including integrating gender considerations into conflict early warning systems and involving women and their specific needs in conflict prevention and disarmament activities,”](#) opens a significant space for considering gender perspectives in economic sanction design and implementation.

SO4 considers the need to address patriarchal norms and the discriminatory policies that they entail. It highlights the barriers that women, and



other minority and marginalized groups, often face in claiming their rights and considers how the U.K. can influence “partner countries” and gives an example of U.K. support for women in the Jordanian Security Sector. The increase of women therein is described as “a sound basis to continue a strategic partnership between the U.K. and Jordan.” Sanctions are often used as means of conflict prevention and looking at economic sanctions through the lens of the prevention pillar provides quick wins for implementation.

Relief and Recovery

Although economic sanctions are commonly used as preventive policies to thwart conflict escalation, the relief and recovery pillar, as part of the post-conflict period, can be a useful tool to promote considerations of the sanctions’ gendered impacts and to advance women’s social, political, and economic empowerment. These efforts have the potential to transform conflict prevention work and to support sustainable peace efforts. Women and girls do more than just “[play a crucial role in ... relief and recovery efforts](#)” during post-conflict reconstruction; the involvement of women and girls in this period of transition from conflict to peacebuilding phases provides a route for the causal mechanisms that drive both gender inequality and conflict to be reshaped to promote sustainable peace.

SO3 specifically considers relief and recovery and the importance of implementing a “gender-responsive humanitarian approach.” There is scope here to consider the gendered impact of sanctions and ensure their implementation in post-conflict scenarios does not make the situation worse for women and children. Sanctions can be applied effectively and ineffectively and, especially when not considered through a gendered lens, may have inadvertent consequences for the most vulnerable. As such, the shift from comprehensive to targeted sanctions is welcome.

Where comprehensive sanctions are applied, specific carveouts for health and humanitarian assistance should be encouraged to ensure that refugee camps and internally displaced persons maintain access to basic goods and services. For relief and recovery, it is essential that sanctions are not misused and that their

application follows a significant consideration of their gendered impact.

Sex-Based Discrimination in Iran

On Dec. 8, 2023, the U.K. added the names of five Iranians to its sanctions list for “[breaches of Iran’s obligation to secure the human rights of persons in Iran, without discrimination including on the basis of a person’s sex, through enforcing mandatory dress code for women](#).” This builds on previous sanctions employed against three Iranian state entities, including the Iranian Morality Police, and brings the total number of Iranian individuals subject to women’s rights-related sanctions by the U.K. to 11. These sanctions have been enacted in response to protests following the 2022 arrest and death of Mahsa Amini while in the custody of the Iranian Morality Police.



A protester holds a sign with Mahsa Amini’s photo (Mostafa Bassim / Anadolu Agency via Getty Images)

Using sanctions to further women’s rights serves the U.K.’s moral and wider geopolitical commitments and can be seen as part of a vision of Global Britain set out in the [Integrated Review](#). The U.K.’s second overarching objective, “[shaping the open international order of the future](#),” contains priority actions including “[promoting gender equality](#),” which specifically emphasizes the importance of working with women’s rights organizations. The 2022 International Development Strategy also lists “[providing women and girls with the freedom they need to succeed](#)” as one of its four overarching priorities.

While Iran is not one of the U.K.’s WPS focus countries, it has been the subject of more targeted sanctions in recent years due to the severe oppression of women’s rights that have been likened to “[gender apartheid](#).” The U.K. has heavily sanctioned Iran through U.N. sanctions since 2006. Most of the U.K.’s current sanctions on Iran focus on human rights, and the [Iran \(Sanctions\) Regulations 2023](#) came into force on Dec. 14, 2023. A statutory guidance [document](#) on Iranian



“ Though human rights law and respect for human rights is discussed, there is no mention of the global WPS agenda in the policy guidance. Given the number of sanctions directly related to sex discrimination, this is a missed opportunity. ”

sanctions last updated Dec. 21, 2023, describes the regulations as imposing “financial, trade, shipping, director disqualification and immigration sanctions for the purposes of encouraging the Government of Iran to comply with international human rights law, respect human rights and deter the Government of Iran or an armed group backed by the Government of Iran from conducting hostile activity against the United Kingdom or any other country.”

Though human rights law and respect for human rights is discussed, there is no mention of the global WPS agenda in the policy guidance. Given the number of sanctions directly related to sex discrimination, this is a missed opportunity. Gender mainstreaming necessitates a full understanding of the gendered impact of sanctions, and the monitoring and reporting mechanisms make no reference to this. To develop gender-responsive sanctions regulations, HMG should formalize gendered considerations within the development, implementation, and monitoring of sanctions regulations that are based in a comprehensive understanding of how sanctions effects are gendered. Similarly, sanctions directed to highlight and enhance women’s meaningful participation should ensure broader engagement with women’s and civil society groups as well as mechanisms for monitoring and reporting that are gender sensitive.

Between 2017 and 2022, civil society recommendations drove [4 percent](#) of the U.K.’s Magnitsky-style sanctions. While the U.K. has [supported](#) Iranian women’s demands for government accountability and for greater respect for their human rights by the government, sanctions [undermine the efforts](#) of female protesters and activists, as pressure placed on the economy by sanctions forces many women and girls to divert energy from advocacy

toward [providing](#) for their families as resource disruption leads to economic hardships for civilians.

To effectively protect and empower women’s rights organizations, activists, and peacebuilders around the world – as the U.K. has [committed](#) to do within the WPS NAP – sanctions regulations that are employed with the intent to support the rights and participation of women and other marginalized groups should be driven and shaped by robust monitoring and reporting mechanisms that disaggregate their impacts on civilians by sex and age to ensure they are effective in meeting their goals. These efforts should follow the data collection and analysis systems [employed by](#) the humanitarian response industry by facilitating direct engagement with local civil society organizations, which are best-placed to report on effects and offer guidance for implementation to minimize the negative cascading impacts of sanctions that, despite intentions, may harm women’s rights.

Countering Gender-Based Violence

Individuals and agencies in the [Central African Republic](#), the [Democratic Republic of the Congo](#), [Mali](#), [Myanmar](#), [South Sudan](#), [Sudan](#), [Syria](#), and Yemen have been targeted by U.K. sanctions in relation to “rape and other forms of sexual and gender-based violence.” CRSV is motivated by a range of political, military, or economic objectives and is a crime punishable under International Human Rights Law, International Humanitarian Law and International Criminal Law. With the “use of U.N. and U.K. sanctions regimes to deter CRSV perpetrators” listed at Objective 2 of the 2022 PSVI Strategy, countering CRSV has become a central motivation of U.K. human rights sanctions since 2022. This accords with the commitments on GBV in SO2 and puts the U.K. among other states that have made CRSV a motivator for economic sanctions.



The U.K.'s application of sanctions to punish and prevent CRSV warrants further direct engagement with the WPS agenda and especially the 2023-2027 NAP, which goes far beyond CRSV and considers it as occurring [“on a continuum of interrelated and recurring forms of violence primarily against women and girls.”](#) The U.K. currently deploys asset freezes and travel bans against those involved in GBV through the perpetration of forced marriage and human trafficking, including individuals from Pakistan, Libya, and Mali.

This indicates GBV and other forms of violence are already being considered, but the U.K. could go further to expand its considerations of violence against women as an issue to be addressed through sanctions. The NAP outlines multiple forms of GBV – including crimes against men, boys, and LGBTQ+ people – as well as the U.K.'s commitments to preventing and responding to these crimes. As the U.K. government builds on its [“What Works to Prevent Violence”](#) research program to identify and scale up effective approaches to preventing GBV, sanctions regulations should be considered within this work as a potentially effective tool to promote accountability for various forms of GBV along the “continuum.”

For example, while U.K. sanctions regulations regarding the government of Venezuela [include provisions](#) for deterring torture and inhumane treatment of detainees, they include no explicit considerations for women or other marginalized groups. Violence against imprisoned individuals often has a differentiated effect based on gender. While arbitrarily detained by authorities, Venezuelan women were subjected to multiple forms of GBV, including sexual violence, gendered forms of torture, and sexual exploitation; these crimes were rarely investigated, and perpetrators acted with impunity. In Myanmar's Rakhine state, sanctions have been imposed against individuals and entities responsible for the perpetration of gender-based violence against men, women, and children or ethnic and religious minorities. Deeper understandings of CRSV and of broader acts of GBV within sanctions policy will enable a fuller understanding of how it can be combatted including through use of targeted sanctions.

Sanctions policy could also be made more effective by understanding the motivation to commit these acts

and whether it is part of a wider strategy to undermine women's rights. As the number of women who are active in political and public spaces grows, so too do the instances of violence against them. [“Intentionality matters”](#) when considering acts of violence against politically active women, which are rarely random but have strategic aims extending beyond inflicting harm on an individual. Given that a broader goal of political violence is typically to disrupt the flow of political processes, it is vital to understand the specific objectives of GBV against politically active women to effectively respond to and prevent it. Motivations for gender-based political violence commonly stem from the desire to [preserve politics as a masculine](#) space and exclude women.

By mainstreaming gendered considerations in the use of sanctions to respond to and prevent political violence, the U.K. would be better positioned to address the specific challenges and threats faced by women and marginalized groups in these spaces. In some instances, this is already happening. In the case of Yemen, for example, Abu Sagar Zabin's role as a member of Yemen's Ministry of Interior “in a policy of intimidation and use of systematic arrest, detention, sexual violence and rape against politically active women” is referenced specifically. So too is the arms embargo on the Houthis, which was imposed in response to the threat that the rebel militia poses to the peace and security of the fragile state of Yemen, partly justified as they have “implemented a policy of sexual violence and repression against politically active women.” By addressing the driving forces of political violence against women, U.K. sanctions regulations can accelerate progress toward more equitable and inclusive political landscapes globally.

Integrating LGBTQ+ Rights in Sanctions Policy

As the issue of gender-based violence against LGBTQ+ persons was acknowledged by the 2023 NAP, the WPS agenda can also provide a framework to assist in the development of sanctions that effectively respond to and prevent these crimes. The U.K. has sanctions in place to punish and prevent crimes against LGBTQ+ persons. In Chechnya, a semi-autonomous province of Russia, the Terek Special Rapid Response Unit and three Chechen individuals are subject to asset freezes



Demonstrators outside the Russian Embassy in London in 2017 lay flowers atop a rainbow flag to protest a reported crackdown in Chechnya on members of the LGBTQ+ community. (Justin Tallis / AFP via Getty Images)

and travel bans for [“the arrest, murder and torture of LGBT persons.”](#)

Centralizing the rights and needs of LGBTQ+ persons has been a stated aim of U.K. foreign policy since December 2007, when the FCO established a [program](#) for promoting the human rights of LGBTQ+ people. In 2010, it set out guidance for personnel and indicators for assessing LGBTQ+ human rights in countries with a priority on those “where there is complete illegality, or there are moves to introduce decriminalization, and seek ways to raise the issue and lobby for decriminalization.”

To some extent, the U.K. has been a global leader in wielding its economic power to further the rights of LGBTQ+ persons. In 2011, then-Prime Minister David Cameron made it clear that countries receiving U.K. aid should respect gay rights. This was a significant part of a global condemnation that led to the repeated shelving of Uganda’s early attempts to

pass its [Anti-Homosexuality Act \(AHA\)](#), which made “aggravated homosexuality” a capital offense. The U.K. has advocated for LGBTQ+ rights through Official Development Assistance (ODA) and is a self-described “champion for the human rights of LGBT+ people around the world.”

Despite the U.K.’s advocacy, however, Uganda and 31 other countries in the [Commonwealth of Nations](#), over which the U.K. has considerable influence, currently criminalize consensual adult same-sex relations. The U.K. has described the 2023 AHA as [“deeply discriminatory”](#) and “appalling.” Despite Cameron’s suggestion in 2011 that aid could be conditioned on protection of LGBTQ+ persons, no punitive measures have been forthcoming against Uganda in the wake of the enactment of the AHA. Unlike the U.S., which has imposed travel bans and asset freezes, and the World Bank, which has [halted new loans](#) to Uganda in response to the passage of the AHA, the U.K. has been unwilling to threaten sanctions to further



LGBTQ+ rights beyond those deployed in Chechnya. For example, no U.K. sanctions against Russia have referenced the country's increasingly hostile legal and political environment for LGBTQ+ people, including a recent Supreme Court [ruling labeling](#) the "international LGBTQ+ public movement" as an "extremist organization." As a country that has spearheaded LGBTQ+ rights in its foreign policy, the U.K. can and should translate rhetoric into reality through developing LGBTQ+-sensitive economic sanctions. Cameron, the current foreign secretary, has made LGBTQ+ issues a cornerstone of his prime ministerial legacy and can develop a consistent approach through developing sanctions policy that goes beyond [arrest, murder and torture of LGBTQ+ persons](#) and considers the individuals and agencies that push for restriction of LGBTQ+ rights and criminalization.

These would need to be developed, implemented and monitored in a manner that would avoid a backlash against these communities, and the WPS NAP provides a framework for doing so. The most recent NAP references GBV against LGBTQ+ persons (SO2), their barriers to accessing assistance (SO4), and cyberthreats against them (SO5), and Uganda receives a large amount of humanitarian assistance from the ODA.

The [2023 U.K.-Uganda development partnership](#) summary does mention "violence and discrimination" against the LGBTQ+ community and claims that "the U.K. will use a full range of tools to defend democratic norms and the rights of excluded groups, for example the LGBT+ community." However, it does not highlight what those tools are. By using the pillars of WPS, the U.K. can develop more specific metrics that call for sanctions to further LGBTQ+ rights.

Supporting Civil Society and Democratic Opposition

Promoting democracy and protecting civil and political rights around the world has been a long-standing priority of the U.K. and its foreign aid programming. In response to the growing wave of global democratic backsliding in recent years, the use of economic sanctions as a coercive tool to promote democracy has become [increasingly popular](#) among Western democracies, including the U.K. To this end, the

U.K. established unilateral regulations for the use of sanctions to ["promote respect for democracy, the rule of law and good governance."](#) The FCDO International Women and Girls Strategy 2023-2030 recognizes that women's status and ability to participate in civic and political processes are strongly and inextricably linked to the health of a democracy in a given state. Given that these connections between gender equality and democracy have been readily made by the U.K., the lack of explicit consideration for women's participation and protection within civic and political spaces represents a shortcoming in its sanctions regimes and an impediment to HMG's ability to effectively promote and defend democracy through economic coercion.

Over the past two decades, increasingly autocratic governments have suppressed political and civil freedoms, as well as economic and social rights around the world. Authorities in Venezuela, [Belarus](#), [Nicaragua](#), and [Myanmar](#), for example, have used arbitrary detention and political imprisonment to suppress political opposition, punish civic dissension, and minimize accountability for government activities. As the experiences of any form of imprisonment and arbitrary detention are [gendered](#), the inclusion of provisions within sanctions regulations that account for the unequal vulnerabilities of women and other marginalized groups while in detention is vital to ensure that the specific gendered needs of political prisoners are considered in coercive measures.

Additionally, the suppression of civil society groups and the closure of the civic spaces within which they operate is a highly gendered issue; therefore, the use of sanctions by the U.K. to counter attacks on civil society should similarly integrate gendered considerations. Women's civil society organizations have long been an integral part of the global WPS agenda, having been a catalyzing force for the adoption of the U.N. Security Council resolution on Women, Peace and Security in 2000. Indeed, the U.K.'s WPS NAP acknowledges that ["civil society are in the driving seat of the WPS agenda"](#) and "recognizes the importance of civil society as a key strategic partner" in the implementation of its WPS objectives.

As civic space shrinks in many countries experiencing democratic backsliding, women and marginalized groups are [disproportionately impacted](#) as their



Lord (Tariq) Ahmad of Wimbledon speaks at the United Nations Security Council meeting on women and peace and security in New York City in July 2023. Ahmad is the U.K. Prime Minister's Special Representative on Preventing Sexual Violence in Conflict. (Lev Radin / Pacific Press / LightRocket via Getty Images)

historical exclusion from formal governance institutions and political processes has left the gender equality movement and related organizations more heavily dependent on civil society organizing to advance their objectives. As backlash against women's rights and gender equality is a [common element](#) of democratic backsliding, efforts to curtail civic activity are gendered in nature.

In Belarus, women were on the front lines of civic protests in response to the contested 2020 election that [returned](#) authoritarian leader Aleksandr Lukashenko to office. To suppress the protests, Belarusian authorities increasingly targeted women's organizations by instituting ambiguous and repressive laws, such as regulations allowing these groups to be listed as extremist. Female activists in Belarus were also [subject to](#) forced disappearances, exile, arbitrary detention, gender-based violence, torture, and threats against their families.

While U.K. sanctions against Belarus, which were put into force in 2022 to impose asset freezes on targets, encourage its government to [“refrain from actions, policies, or activities which repress civil society in](#)

[Belarus,”](#) the [ambiguity](#) of legal classifications and the [information disclosure](#) associated with registering civil society organizations present specific risks to women and other marginalized groups active in civic spaces. The Belarusian authorities have established a broad array of grounds upon which civil society organizations can be denied registration, meaning that even a minor technicality may lead to denial. Many organizations working for gender equality have been denied legal status on the grounds that gender equality is already [“enshrined in the country at the constitutional level”](#) and that monitoring and reporting on gender-related issues can only be carried out by governmental bodies.

The lack of legal registration hinders these groups from financially or physically advancing their objectives; [legally](#), registered organizations can only receive foreign funding for very specific purposes, [none of which](#) relate to women's rights or gender equality. In the 2023 NAP, the U.K. commits to the defense and support of civil society as a key partnership in countering those hostile to the rights of women globally; as a coercive measure, sanctions regulations would be effective tools toward that end.

Recommendations

The U.K. is the WPS “penholder” at the United Nations. It produced a highly nuanced and detailed fifth National Action Plan (NAP) on Women, Peace and Security and is joining other Western countries in deploying economic sanctions to further women's rights. Effectively integrating WPS into sanctions policy is a necessary and important step toward realizing the agenda and making the U.K. a global leader and force for good. To do so, the following recommendations are made.

- His Majesty's Treasury and its Office of Financial Sanctions Implementation (OFSI) should integrate the WPS agenda into sanction design, implementation, and assessment processes.
- The U.K. government should formalize the use of sanctions to promote accountability for sexual and gender-based violence and the violation of women's and LGBTQ+ rights.
- The Foreign Commonwealth and Development Office (FCDO) should work in collaboration with the OFSI



to coordinate designation criteria and implement best practices for sanctions against violators of women's rights.

- The Treasury should lead on specific commitments on WPS and sanctions set out in the Delivery Plan in future iterations of the NAP.
- Sanctions implemented to address discrimination on the basis of sex must engage with local civil society and women's groups.
- Sanctions in relation to gender-based violence should go beyond CRSV and attempt to specify and contextualize the political, military, and/or economic motivations for that violence.
- The U.K. should use its global influence within and outside of the Commonwealth to expand its push for

LGBTQ+ rights within sanctions policy and should target these in a manner that protects vulnerable groups from backlash.

- The U.K. should ensure that sanctions designed to support civil society and democratic opposition are gender sensitive and consider the agency and needs of women activists and political prisoners.

The U.K. has not yet sufficiently gendered its policies regarding sanction design, implementation, and monitoring. To do so, HMG would do well to integrate the WPS agenda – using both the 2023 WPS NAP and the 2023 International Women and Girls Strategy – to ensure sanctions protect women and girls and are being used to their full transformative potential to push for gender equality globally.



Dr. Max Thompson is Deputy Head of Department in Defence and International Affairs at the Royal Military Academy Sandhurst. He is responsible for oversight of the Army Higher Education Pathway, which has included integrating WPS into academic exercises. He

completed his DPhil in International Relations at St Edmund Hall, Oxford, writing on the role of friendship in U.S. foreign policy and alliance formation. Before arriving at RMAS, he held lectureships at several Oxford colleges and worked as an international consultant at the International Trade Centre in Geneva. His research interests include alliance theory; U.S. foreign policy; the development of the liberal world order; human security; and the women, peace, and security agenda. He recently co-edited and contributed to *Women, Peace and Security in Military Operations* (Howgate, 2023), which considered how militaries can best integrate and apply WPS in their operations.



Kallie Mitchell is an Analyst for the Gender Policy Portfolio at the New Lines Institute. Prior to joining the New Lines Institute, Kallie was a Research Assistant for the Women, Peace, and Security Program at the International Peace Institute, where she focused on gender in

U.N. peace operations and women's participation in peace processes. She previously worked in Stockholm, Sweden, as an Assistant Project Coordinator with the International Institute for Democracy and Electoral Assistance, where she led a research project on electoral assistance in transitional elections. Mitchell also worked as a Research Associate at the Institute of Comparative and Regional Studies in Denver, co-authoring a U.N. Development Program report on inclusive governance for sustainable peace.

Kallie holds a Master of Arts in International Studies from the University of Denver and a Bachelor of Arts in Political Science from the University of Delaware.

Contact



For media inquiries, email media@newlinesinstitute.org



To submit a piece to the New Lines Institute,
email submissions@newlinesinstitute.org



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1776 Massachusetts Ave., N.W. Suite 120
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