

COUNTRY REPORT



# UNITED KINGDOM

2024



Civilian Protection  
Monitor

# Civilian Protection Monitor

Civilian Protection Monitor is a project by **Airwars & PAX**

Based on a framework developed by  
**Center for Civilians in Conflict**

**Analysis in this report is based on publicly accessible sources only and covers developments until 1 February 2025.**

## **PAX**

is a Netherlands-based NGO with additional offices and peacebuilding programmes in over a dozen (post-)conflict countries. Together with people in conflict areas and concerned citizens worldwide, PAX works to build just and peaceful societies across the globe.

## **Airwars**

is a transparency watchdog which tracks, assesses, archives and investigates civilian harm claims in conflict-affected nations. Airwars works to reliably and independently document the human cost of war in order to promote a more peaceful world where human lives are acknowledged and taken in to account by militaries, policy-makers, and global citizens with dignity and empathy.

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**Cover image** Ray Harrington, Unsplash, 2022

The logo for PAX, consisting of the letters 'PAX' in a bold, orange, sans-serif font.The logo for Airwars, consisting of the word 'Airwars' in a white, sans-serif font, centered within a solid blue square.

## **ACKNOWLEDGEMENTS**

We would like to extend our heartfelt thanks to the many people who gave up their time and shared their knowledge with us for this report. We could not have created the CPM framework, nor applied it comprehensively to national contexts, without the support of partners in NGOs, academia, and civil society - and without the valuable engagement with officials in governments and ministries/departments of defence. None of them bear responsibility for any of the opinions or possible errors in this report, which are the authors' own.

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# INTRODUCTION TO CPM

The Civilian Protection Monitor (CPM) introduces an evaluation system adapted from a framework created by Center for Civilians in Conflict which allows for the consistent measurement of state performance in protecting civilians and providing redress in cases where military actions result in harm to civilians.<sup>1</sup> CPM aims to provide civil society organisations, policymakers, military actors as well as academics and media with insights into the protection-related policies and performance of individual states and the data they need to press for improvements. A collaborative partnership between Airwars and PAX, CPM aims to bridge the gap between civil society and policymakers in advancing transparency for state military actions.

## **Why does civilian harm mitigation and response matter?**

Civilian harm mitigation and response (CHMR) is essential for minimising the impact of military operations on civilians in conflict zones. Protecting civilians is a core tenet of International Humanitarian Law (IHL), aiming to reduce unnecessary suffering and foster humane conduct during conflicts. Effective CHMR strategies not only save lives but also prevent displacement, psychological trauma, and the disruption of vital services and infrastructure. Civilian harm mitigation and response contributes to the stability and resilience of conflict-affected communities, reducing the long-term social and economic costs of conflict. Moreover, prioritising civilian protection can help to maintain public support for military operations, foster legitimacy and prevent moral injury among service personnel.

Independent monitoring of state practices in relation to CHMR is equally crucial, as it promotes accountability and transparency. External oversight ensures that governments and militaries adhere to established norms and standards, reducing the risk of unchecked power or impunity. Independent monitoring can lead to improved CHMR practices, as it provides unbiased assessments and evidence-based recommendations through which states can learn from each other and drive policy and procedural reforms. Additionally, it builds trust within the international community and affected populations, as they see states addressing and learning from incidents of civilian harm. Overall, CHMR and independent monitoring work together to protect civilians, uphold humanitarian values, and strengthen accountability in conflict situations.

# METHODOLOGY

CPM measures five indicators: the national policy frameworks addressing civilian harm mitigation and response, civilian harm tracking, civilian harm investigations, transparency on policies and practices, and response mechanisms to harm to civilians. Each indicator has its own leadership tier, with qualitative scoring categories to describe the steps a state must take to receive a certain score.

The current indicators were chosen because they are key aspects of civilian harm mitigation and response, and allow for a cross-comparison between different states on the basis of open sources. For several reasons, other important sub-aspects of CHMR, such as mitigation itself, have not been included yet. This is primarily because there is not yet enough transparency in the states monitored - or any other states - to be able to analyse and score operational mitigation approaches.

The analysis is based on publicly available sources only, to ensure the analysis is verifiable and reproducible. CPM is also intended as a tool to push for greater transparency and accountability on civilian harm. By relying on open sources, states are encouraged to release further details on their civilian harm mitigation and response practices to increase their score.

This report examines the UK's approach to mitigating and responding to civilian harm, assessing the systems and practices in place to prevent, track, investigate, and address harm in conflict environments. Our analysis considers both civilian harm that occurred as a result of military action in compliance with International Humanitarian Law (IHL) and harm that occurred as a result of unlawful action; both have lasting impacts on the civilians affected and provide insights into the strengths (and weaknesses) of the systems put in place to mitigate and respond to harm – however it occurs. By monitoring the UK's mechanisms for harm mitigation and response, we assess whether they align with best practices, ensuring accountability, adaptability, and context-sensitive engagement in operational settings.

Each country report has been reviewed by external independent experts.

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# EXECUTIVE SUMMARY

*Note: the subsequent analysis covers developments that occurred up to 1 February 2025, exclusively making use of open-source materials that were available until that time.*

The United Kingdom's approach to civilian harm mitigation and response contains important examples of good practice in its policies and select recent military campaigns. An assessment as to the extent to which these good practices are embedded within institutional policy, training, and decision-making is challenged by an overall lack of transparency around the UK's approach. Where elements of the approach can be reviewed publicly, there are also some evident gaps in application.

The country's approach to the protection of civilians is steered by the Joint Services Publication 985 on human security in defence, which sets an example of good practice by approaching civilian harm as a broad concept that goes beyond death and injury to also consider the long-term impact of conflict for different demographics in conflict settings. At the same time, however, good practices from previous coalitions have not been effectively codified into policy or guidance and some significant gaps remain. Notably, most policies are now focused on mitigating harm caused by other actors without detailing how the UK mitigates harm caused by its own operations, and there is significant opacity on the UK's approach to key elements of harm mitigation, such as civilian harm tracking.

There is, in fact, no publicly available information on how the UK tracks civilian harm allegations; while the MoD maintains it is dedicated to investigating allegations, the processes for doing so and for determining whether allegations are investigated and confirmed are not transparent. It is unclear what oversight mechanisms are in place to ensure investigations are handled appropriately, or to ensure that lessons learned from incidents of harm are analysed and effectively feed into operational learning. This is particularly concerning as the MoD's own conclusions on allegations of harm are often significantly different from those of its allies and independent monitors.

In the past, the UK has had systems in place to offer voluntary compensation payments to civilians harmed by military operations, particularly during earlier conflicts in Iraq and Afghanistan. In recent operations, these mechanisms have been removed and legislation has been introduced to further limit options for civilians to seek compensation. The UK acknowledges its commitment to minimising harm, but there is room to enhance how post-harm responses are managed, ensuring that civilians affected by military operations are better able to seek redress.

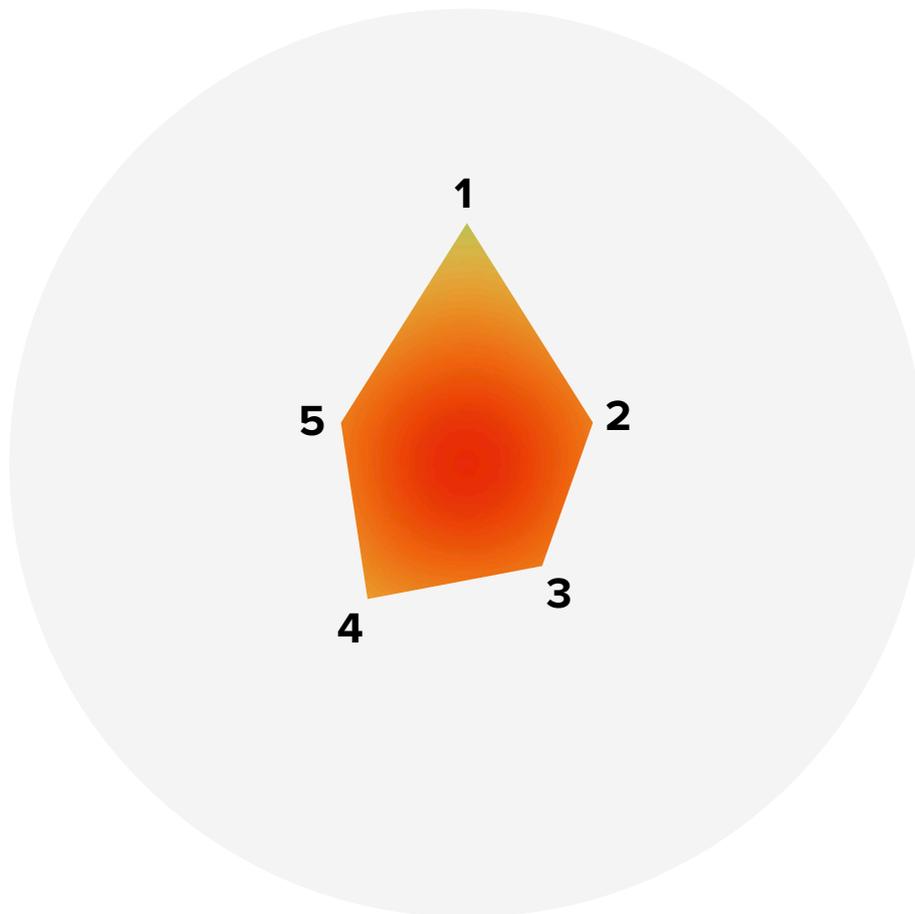
Overall, the UK's approach to protecting civilians during military operations could benefit from greater clarity, coordination, and transparency. Creating CHMR-focused policies that build on existing human security policy, combined with improvements in tracking harm, investigating incidents, and providing post-harm responses are necessary to strengthen the UK's civilian protection efforts going forward.

# CIVILIAN PROTECTION SCORE OVERVIEW II..

## UNITED KINGDOM

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OVERALL SCORE **UNCOMMITTED**



### LEGEND



# CATEGORIES

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1

## **NATIONAL POLICY** **ENGAGED**

The UK has a policy framework aimed at mitigating civilian harm, notably through the Joint Services Publication 985 (2024) and the UK Approach to Protection of Civilians in Armed Conflict (2020). These documents contain elements of good practice, for instance by placing the direct impact of war on civilians in the wider context of human security, reflecting the indirect and reverberating consequences of warfare. At the same time, steps can be taken to significantly improve the policy framework in key areas. Notably, while the policy framework highlights the UK's commitment to mitigating harm caused by others, it offers little in addressing civilian harm from UK operations. These shortcomings hinder the practical implementation of civilian harm mitigation efforts.

2

## **TRACKING** **UNCOMMITTED**

While the UK has outlined the importance of civilian harm tracking in rhetoric, it does not appear to have a functional approach to doing so in practice. While allies and independent monitors have found significant evidence of harm from UK airstrikes in Iraq and Syria, the MoD maintains that it has evidence of only a single civilian casualty from this campaign, indicating either a lack of engagement with the available evidence or a threshold for admitting civilian harm that is far higher than those of its allies. In a 2023 tribunal, a Deputy Director of the MoD responsible admitted being unaware of a systematic approach to tracking harm allegations or a consistent UK written approach to investigating civilian harm.

3

## **INVESTIGATIONS** **UNCOMMITTED**

The UK has made commitments to investigate civilian harm allegations. However, this is undermined by a lack of transparency, consistency, and accountability on the UK's methodology and findings. While policies such as those used during ISAF in Afghanistan showed an intent to investigate civilian harm, allegations have recently emerged of extensive harm to civilians at the hands of UK special forces in Afghanistan, as well as efforts to cover these up. Campaigns launched after ISAF have seen less clarity on how allegations of harm are investigated and assessed.

4

## **PUBLIC REPORTING & TRANSPARANCY** **UNCOMMITTED**

During OIR, the UK was very transparent on the time and location of its airstrikes, setting a strong example for allies. However, this practice has not been institutionalised or carried forward to new operations, such as those countering the Houthis in Yemen. The UK never reported consistently on civilian harm allegations. The MoD often highlights the difficulties in gathering data on civilian harm in conflicts, yet has failed to engage with international and local NGOs offering data and evidence, it has not taken on best practices used by allies and independent watchdogs performing this task in the same conflict zones, and it has not laid out a strategy for how it will address such challenges.

5

## **POST-HARM RESPONSE** **UNCOMMITTED**

The UK currently has no national system for providing amends to those harmed by its military actions. During counterinsurgency operations in Iraq and Afghanistan, the UK government implemented a structured system for offering compensation for civilian harm and property damage. However, during OIR, there was a stark shift in policy, with no regular approach to ex-gratia payments to civilians. This appears to have been replicated in more recent operations, such as Operation Poseidon Archer in Yemen, which has led to allegations of civilian harm that the UK has not responded to. Additionally, legislative changes limiting compensation claims have further restricted civilians' ability to seek redress, effectively curbing the UK's willingness to acknowledge or compensate for harm altogether.

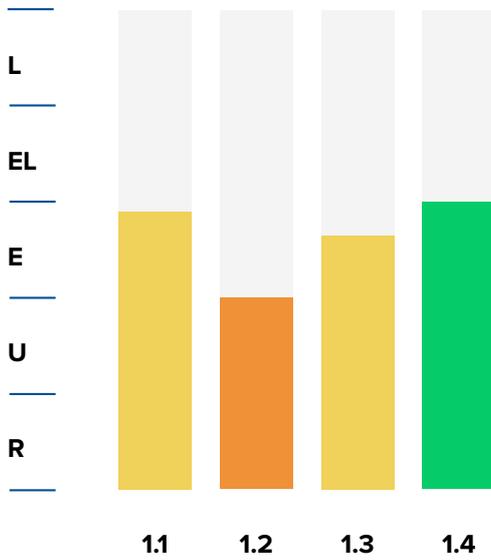
## DETAILED RESULTS PER CATEGORY

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The next page contains an overview of the country's scores across all categories and indicators. The narrative analysis of each country's performance follows further on in the report.

# 1

## NATIONAL POLICY



### DESCRIPTION

The national policy or system of policies, strategies, and guidance adopted by the executive branch of government and its organs (including security institutions) that establishes clear authorities, responsibilities, and guidance for the prevention, mitigation, and response to civilian harm. A national policy framework, when combined with effective implementation of its provisions and formalised engagement with civil society actors can be helpful for communicating a government’s commitment to mitigate harm to civilians.

**1.1 National policy Framework** E

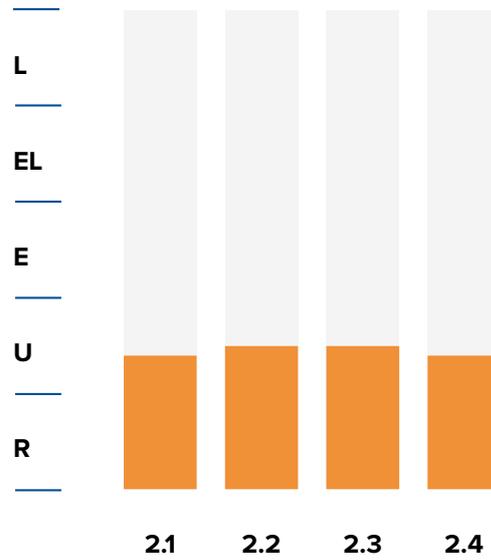
**1.2 Clear policy language** U

**1.3 Clear implementation guidance** E

**1.4 Budget and resources** EL

# 2

## CIVILIAN HARM TRACKING



### DESCRIPTION

An internal (military or security force) process by which an armed actor gathers and analyses data about civilian harm incidents in order to better prevent, mitigate, and address harm in the future.

**2.1 Tracking mechanism** U

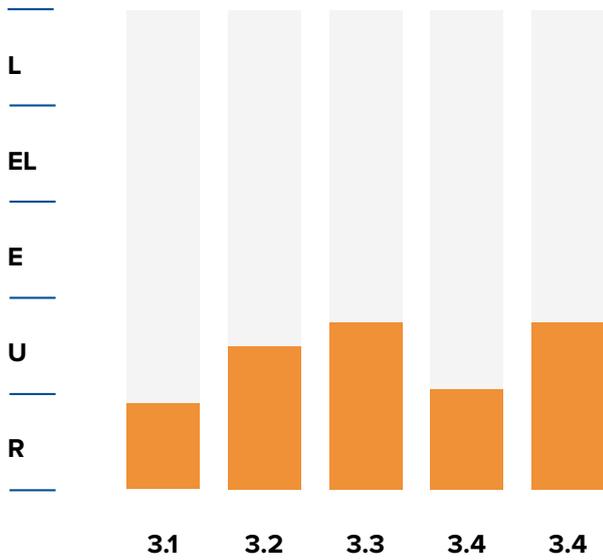
**2.2 Tracking to reduce harm through analysis** U

**2.3 Coordination with investigation mechanisms** U

**2.4 Data management** U

# 3

## INVESTIGATIONS



### DESCRIPTION

Formal inquiries (often in the form of administrative or criminal investigations) that can be used to elucidate facts, to understand the cause of harm, to identify relevant state and/or individual responsibilities, to facilitate the appropriate response and/or remedy, and even to exonerate.

- 3.1 Investigates all credible reports** U
- 3.2 Conducts witness interviews and site visits** U
- 3.3 Reports of investigation** U
- 3.4 Interaction with response mechanisms** U
- 3.5 Criminal investigations** U

# 4

## PUBLIC REPORTING & TRANSPARENCY



### DESCRIPTION

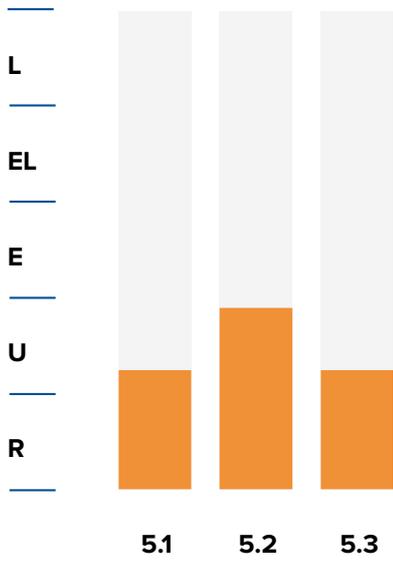
Systems and procedures to ensure that the public and institutions of public oversight are made sufficiently aware of civilian harm, and to protect the right of victims to pursue remedy. Information may be limited or redacted due to privacy concerns for affected civilians, to safeguard other ongoing investigations or for national security reasons, but these reasons should not be abused and should be subject to review.

- 4.1 Discloses time and location of operations** E
- 4.2 Civilian harm reporting** U
- 4.3 Public disclosure of process and records** U

# 5

## POST-HARM RESPONSE

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### DESCRIPTION

Efforts to acknowledge and express condolence for harm, to include offers of monetary and non-monetary forms of post-harm assistance.

**5.1 Process for amends U**

**5.2 Acknowledgement U**

**5.3 Comprehensive, victim-centred condolence U**

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# 1 NATIONAL POLICY

Indicators: National policy framework; Clear policy language; Clear implementation guidance; and Budget and resources

## CATEGORY DESCRIPTION

The national policy or system of policies, strategies, and guidance adopted by the executive branch of government and its organs (including security institutions) that establishes clear authorities, and responsibilities, and guidance for the prevention, mitigation, and response to civilian harm. A national policy framework, when combined with effective implementation of its provisions and formalised engagement with civil society actors, can be helpful for communicating a government's commitment to mitigate harm to civilians.

## OVERALL SCORE **ENGAGED**

The UK has a policy framework aimed at mitigating civilian harm, notably through the Joint Services Publication 985 (2024) and the UK Approach to Protection of Civilians in Armed Conflict (2020). These documents contain elements of good practice, for instance by placing the direct impact of war on civilians in the wider context of human security, reflecting the indirect and reverberating consequences of warfare. At the same time, steps can be taken to significantly improve the policy framework in key areas. Notably, while the policy framework highlights the UK's commitment to mitigating harm caused by others, it offers little in addressing civilian harm from UK operations. These shortcomings hinder the practical implementation of civilian harm mitigation efforts.

# 1.1 NATIONAL POLICY FRAMEWORK

## INDICATOR DESCRIPTION

The government has adopted a national policy framework on mitigating civilian harm resulting from its own military operations, including clear definitions of key terminology such as ‘civilian harm.’

## SCORE **ENGAGED**

The UK has adopted national policies relevant to civilian harm mitigation, notably the JSP985 and the UK Approach to the Protection of Civilians in Armed Conflict. These contain elements of good practice, yet there is no information in these policies – or any other publicly available documents – on the UK’s methodology when it comes to mitigating, tracking, investigating, or responding to harm from their own military actions in practice.

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### What evidence exists to support this?

The UK government has several policies in place that address different aspects of civilian harm mitigation and response:

- The 2024 Joint Services Publication 985 (JSP985) is the UK’s most comprehensive policy document that explicitly mentions civilian harm mitigation.<sup>2</sup> It includes some commendable intentions. Notably, the JSP985 uses the broader term ‘harm’ rather than focusing purely on civilian casualties.
- The UK’s 2020 Approach to Protection of Civilians in Armed Conflict also emphasises the importance of civilian protection, but mostly focuses on how the UK can lessen the harm caused by other actors.<sup>3</sup>
- The JSP985 connects the civilian harm mitigation and response (CHMR) agenda to other policy agendas such as Cultural Property Protection (CPP), providing a comprehensive approach to the various intersecting types of harm that can affect civilians in warfare, which is often overlooked by other states. Moreover, it pays explicit attention to how different demographics, such as women, men, children and young people, are impacted in conflict settings and notes the intention to incorporate this into decision making.
- The UK has published two editions of the Voluntary Report on the Implementation of International Humanitarian Law at Domestic Level (2024).<sup>4</sup> This contains a review of the UK’s protection of civilians through the lens of IHL, including an overview of its work internationally on the women, peace, and security agenda, the children in armed conflict agenda, and international peacekeeping. This report also touches directly on “respect for IHL in United Kingdom military operations”, noting; “...The MOD has robust targeting policies, practices and processes...and conduct a rigorous assessment before and after striking a target”. The report goes on to emphasise that the MoD will investigate all credible reports of civilian harm from UK actions. While these are valuable commitments, there are no details on what makes the UK’s approach to targeting robust, the post-strike analysis rigorous, or an allegation of harm credible enough to investigate.
- With the broadened focus on human security, the UK has prepared to coordinate and implement several CHMR elements that may have otherwise been scattered across different departments.
- The UK is a signatory of the 2022 Political Declaration on the Use of Explosive Weapons in Populated Areas (EWIPA), see textbox on page 16.<sup>5</sup>

### What gaps/caveats are important to consider?

There is no one policy that incorporates all necessary efforts to mitigate harm to civilians across departments.

- The UK has no public information on its approach to investigating, assessing, or responding to civilian harm caused by its own military operations.
- The UK documents, both the JSP985 (2024) and the Approach to Protection of Civilians (2020), focus predominantly on how the UK will prevent harm caused by other actors, especially when it comes to women and children, with little focus on how civilians will be protected from the impact of UK military actions. Additionally, the JSP985 does not mention options for responding to harm caused by UK operations.
- Several significant gaps thus remain, such as the lack of ability to estimate and track civilian harm and unclear standards for investigations. While the Approach to PoC commits the UK to investigate credible allegations of harm, there is no clarification on who will do these investigations, what methodology will be applied, or what is considered a ‘credible allegation.’
- There are no requirements for reporting on the implementation of the PoC Approach or JSP985.
- Some documents include general statements on the importance of civilian harm mitigation, with no details on what this means for UK practice. The JSP985 for instance states that the UK mitigates harm to civilians by “considering the Protection of Civilians as central to the Human Security approach and integral to all military operations; continuing to consider measures to reduce the risks posed to civilians when conducting operations and missions” without clarifying what this means, who is responsible, what methodology will be used, and how progress will be reported.<sup>6</sup>

- While there is some ad-hoc engagement between the MoD and civil society, there is a lack of sustained avenues for in-depth sharing of concerns, lessons, recommendations, and mutual learning. It is unclear, for instance, how civil society organisations can share learnings on past UK military campaigns and their impacts on civilians.

### **The Political Declaration on the Use of Explosive Weapons in Populated Areas (EWIPA)**

The 2022 Political Declaration on Explosive Weapons in Populated Areas (EWIPA) is aimed at addressing the humanitarian consequences of using explosive weapons in densely populated areas. The declaration, endorsed by 87 states - including the US, UK, and the Netherlands - acknowledges the severe and often long-term impact of explosive weapon use in populated areas, which leads to high civilian casualties, displacement, and extensive destruction of infrastructure. It emphasises that the use of such weapons in populated regions should be restricted to prevent indiscriminate harm and protect civilian life, aligning with existing International Humanitarian Law.

Signatories to the declaration commit to adopt preventive measures, including stricter policies on the use of heavy explosive weapons in populated zones. It calls for enhanced training of armed forces, better planning of military operations, and transparency in tracking civilian harm. Additionally, it promotes comprehensive victim assistance, response measures, and humanitarian aid to communities affected by such violence. The declaration also seeks to improve data collection on the use of explosive weapons and their impacts, fostering accountability and facilitating a response based on evidence.

While the declaration is not legally binding, its adoption represents a significant step in the global effort to limit the humanitarian fallout of armed conflict in urban areas.

## **1.2 CLEAR POLICY LANGUAGE**

### **INDICATOR DESCRIPTION**

The policy contains clear language and commitment to protecting civilians.

### **SCORE UNCOMMITTED**

The language in UK policies on civilian harm mitigation is relatively clear, yet there are significant gaps in terms of clarity on wording (for instance on how the MoD defines ‘civilian harm’) and clarity on processes (e.g., how does the MoD track and investigate allegations of harm?).

#### **What evidence exists to support this?**

The PoC approach (2020) and JSP985 (2024) both have clear language, stressing the importance of protecting civilians. They do not, however, provide clear details on the UK’s approach to tracking, investigating, assessing, or responding to civilian harm from its own operations.

#### **What gaps/caveats are important to consider?**

There is no easily accessible overview of all CHMR-related documents.

- There is no publicly available, centralised overview of all relevant documents relating to civilian harm mitigation and response in the UK.
- Key terms, such as ‘civilian harm,’ are not defined in the UK’s policy framework (see the glossary for our definition of the term). When definitions are not included or remain unclear, this leaves too much room for diverging interpretations of policy obligations. This is exacerbated by the differences in the MoD’s focus on the ‘human security’ agenda, and the FCDO’s focus on the ‘protection of civilians’, with no clarification on the interoperability between these two departmental approaches.
- The JSP985 often relies on normative language, such as “should”, in laying out best practice for the UK to adopt on human security. Coupled with the lack of reporting requirements and lack of information about resourcing available to teams, the JSP985 at times comes across as a series of recommendations for the MoD to take on board, as opposed to an action plan.
- It is unclear what reporting channels currently exist for independent monitors and civilians wishing to report harm to the MoD directly.

## 1.3 CLEAR IMPLEMENTATION GUIDANCE

### INDICATOR DESCRIPTION

Policy and implementation guidance is clear and includes defined roles and responsibilities.

### SCORE **ENGAGED**

The JSP985 lays out recommendations for which teams should be responsible for which aspects of human security. It does not clarify what reporting will be conducted to ensure these teams have taken said tasks on board, and there is no clarity on how the teams in question are being resourced to perform new tasks.

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#### What evidence exists to support this?

Recent policies include some references to implementation and responsibilities:

- The JSP985 lays out which teams should be responsible for which aspects of human security. The JSP985 mentions organisational responsibilities on strategic as well as operational levels.
- Human Security Advisors are situated across all three services and in Strategic Command, to provide guidance on aspects of human security and “support the advancement of human security across Defence.”<sup>7</sup>
- The JSP985 sets out the intention to create human security career paths and specific training on human security. This appears to now be active, with bi-annual Human Security in Military Operational Planning courses being conducted at the Defence Academy of the United Kingdom.

#### What gaps/caveats are important to consider?

- The JSP985 does not lay out any reporting requirements on the fulfilling of its recommendations. It also does not clarify how tasks assigned to teams within the MoD fits into their existing work, or whether additional resources will be available to implement said tasks.
- Chapter 5 of the JSP985 lays out the training on human security that UK defence personnel should receive. However, it is unclear if this includes a focus on the mitigation of harm to civilians from own actions, or the tracking, investigation, response to, or learning from allegations of harm.

## 1.4 BUDGET AND RESOURCES

### INDICATOR DESCRIPTION

Funding, personnel and time are given toward implementation of CHMR policies.

### SCORE **EMERGING LEADER**

The MoD established a Human Security team to implement policies and guidance, and represent British commitments to human security in international fora. There are also Human Security Advisors placed throughout the MoD. However, the Human Security team has a broad scope and limited resources, leaving only a partial focus on CHMR. Additionally, there is no clarity on how other teams in the MoD are resourced and trained to take on tasks outlined in the JSP985.

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#### What evidence exists to support this?

- There is a small team within the UK MoD specifically focused on human security, with approximately three staff members.
- Human Security Advisors are situated across all three services and in Strategic Command, to provide guidance on aspects of human security and “support the advancement of human security across Defence.”
- The JSP985 (2024) provides some broad descriptions regarding which government department is responsible for certain areas of human security.

#### What gaps/caveats are important to consider?

- The JSP985 does not provide specifics on resourcing, personnel, or buy-in from the teams that are identified as being responsible for parts of its implementation.
- There is no public information available on a UK CHMR-specific budget.

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# RECOMMENDATIONS

## **Conduct a review of the UK's current approach to civilian harm mitigation and response**

The UK MoD should review its approach to tracking, investigating, assessing, reporting, and responding to civilian harm from UK actions, in line with recent commitments including those made as a signatory to the EWIPA declaration. This should build on input from affected civilians, engagement with civil society actors and other experts, as well as best practices identified by allies.

## **Increase the transparency of the UK's approach to civilian harm**

This should include an overview of the methodologies and procedures used to track, assess, investigate, respond to, and learn from allegations of harm from UK actions. Ensuring transparency and accountability in these areas is crucial for improving public trust and global cooperation, and implementing transparency on this topic would align the UK to many of its allies.

## **Provide definitions of key terminology**

This should include clarity on terms such as 'civilian harm' and 'credible' allegations. Clear and consistent terminology is essential to avoid misinterpretation and ensure the uniform application of policies. This will enhance coordination across UK departments and international partners.

## **Further clarify roles and responsibilities for executing the JSP985**

Clear lines of accountability are necessary to ensure the effective implementation of the policy. The allocation of appropriate resources will ensure that responsible teams are equipped to carry out their roles.

## **Require periodic public reporting on the implementation of the JSP985 and the UK Approach to PoC**

Instituting mandatory, regular reports would increase accountability and allow for tracking progress. This would also highlight areas where further improvements are necessary.

## **Formalise engagement with independent experts and civil society actors**

The UK MoD should formalise regular engagement with independent experts and civil society organisations, who hold important knowledge and lessons on CHMR practice in the UK and elsewhere. There has been some engagement in recent months, but this remains ad-hoc and personality-driven as opposed to institutionalised.

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# 2 CIVILIAN HARM TRACKING

Indicators: Tracking mechanism, Tracking to reduce harm through analysis; Coordination with investigation mechanisms; and Data management

## CATEGORY DESCRIPTION

An internal process by which an armed actor gathers and analyses data about civilian harm incidents in order to better prevent, mitigate, and address harm in the future.

## OVERALL SCORE **UNCOMMITTED**

While the UK has outlined the importance of civilian harm tracking in rhetoric, it does not appear to have a functional approach to doing so in practice. While allies and independent monitors have found significant evidence of harm from UK airstrikes in Iraq and Syria, the MoD maintains that it has evidence of only a single civilian casualty from this campaign, indicating either a lack of engagement with the available evidence or a threshold for admitting civilian harm that is far higher than those of its allies. In a 2023 tribunal, a Deputy Director of the MoD responsible admitted being unaware of a systematic approach to tracking harm allegations or a consistent UK written approach to investigating civilian harm.

## 2.1 TRACKING MECHANISM

### INDICATOR DESCRIPTION

The government has or plans for the capabilities, resources, personnel, and systems needed to track civilian harm, i.e., to systematically collect and analyse information on harm.

### SCORE **UNCOMMITTED**

The UK does not appear to systematically and effectively track civilian harm. It regularly reaches different conclusions from its allies, including the US, and independent monitors on allegations of harm. There is no information available to the public on how the UK tracks, assesses, or investigates allegations of harm, and a lack of clarity on what evidence is required for an allegation to be investigated or found plausible.

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### What evidence exists to support this?

The UK has made several commitments on the tracking of the effects of operations:

- In its Approach to the Protection of Civilians in Armed Conflict (2020), the UK committed itself to “investigate any credible reports that UK actions may have caused civilian harm”.<sup>8</sup> However, there is no clarity on what makes an allegation of harm credible enough to investigate, what methodology will be used to investigate allegations, or how allegations of harm should be submitted to the MoD.
- The UK has committed itself to tracking civilian harm by signing a Political Declaration on the Use of Explosive Weapons in Populated Areas (EWIPA), which requires the use of all practicable measures to ensure appropriate data collection, although it is unclear whether this is being implemented.
- The 2018 Joint Doctrine Publication (JDP 3-46) on Legal Support in Joint Operations notes the role of legal advisors in “civilian casualty report tracking, credibility assessments, investigations and reporting”, yet provides no further details on what these systems entail.
- The UK military conducts Battle Damage Assessments (BDA) for all strikes.<sup>9</sup> BDAs are assessments on the impact of the use of force, primarily focused on whether the munition used functioned as expected, whether the intended target was struck, and what the impact was on enemy combatants. If harm to civilians is observed in the immediate aftermath of the use of military force, this may also be included in a BDA, but they are not tools that are meant to give an insight into harm to civilians - especially as such harm often only becomes apparent in the hours, days and weeks following military action, when a BDA will already have been completed. BDAs also often rely solely on visual evidence from fighter jets or high-altitude drones, which cannot hope to capture evidence of civilians caught under structures or rubble.<sup>10</sup>

### What gaps/caveats are important to consider?

It is unclear what methodology the UK uses to track, assess, and investigate allegations of harm.

- In a 2023 tribunal, a Deputy Director of the MoD team responsible for tracking and investigating harm admitted he was unaware of the standard of proof the UK used when investigating allegations of civilian harm, whether written procedure governed investigations, and whether the UK tracks allegations at a systemic level.<sup>11</sup>
- The UK has only admitted a single civilian casualty from its substantive contribution to the anti-ISIS coalition in Iraq and Syria. However, there is no evidence on who exactly was killed and the US-led coalition did not find evidence of harm, pointing to potential flaws in the UK’s tracking mechanisms.<sup>12</sup>
- The UK MoD consistently reaches different conclusions on allegations of harm than its allies and independent monitors.<sup>13</sup> For instance, the UK and the US Department of Defense (DoD) regularly come to different conclusions on allegations of harm; while the DoD-led anti-ISIS coalition found civilian harm from a British strike in Mosul in November 2016 “credible,” the UK denies that any harm to civilians occurred because of the strike.<sup>14</sup>
- There are no publicly available threshold criteria for what the UK deems a ‘credible’ allegation of harm.
- In 2011, the MoD said in response to a Freedom of Information (FOI) request that it does not collate data of potential civilian harm cases.<sup>15</sup>
- There is no publicly available documentation on how the MoD facilitates institutional and operational learning from civilian harm cases.

### **Recording, tracking, assessment, investigation**

The process of tracking and assessing civilian harm begins with comprehensive recording of incidents, where reports from various sources are gathered to document potential civilian harm. Key components of this step include establishing a reliable data-gathering mechanism, ensuring reports are collected in real-time or shortly after incidents, and cross-referencing sources to verify details about harm. Accurate recording forms the foundation for later assessments and helps in identifying patterns of harm over time.

In the civilian harm tracking phase, collected data is systematically organised and analysed to identify trends and specific incidents that may require deeper investigation. Tracking involves cataloging each event's location, date, weapons used, and reported civilian impacts, and aggregating data to monitor the broader impact of military actions. This stage's key elements include maintaining a clear database, ensuring the integrity and consistency of data, and analysing frequency and severity of incidents to prioritise cases for assessment or investigation.

The final steps, assessments and investigations, focus on evaluating the incidents' credibility and conducting in-depth examinations of selected cases. During assessments, incidents are reviewed to determine if they meet criteria for further scrutiny, often involving corroborative evidence from multiple sources. Investigations delve deeper, with forensic analysis, interviews, and site visits (where possible) to establish accountability and identify operational mistakes or violations of law.

## **2.2 TRACKING TO REDUCE HARM THROUGH ANALYSIS**

### **INDICATOR DESCRIPTION**

The tracking mechanism produces or is effectively designed to produce meaningful analysis and insights that are used by military leaders to change tactics or procedures. The express and stated purpose of the tracking mechanism in policy and practice is to prevent, mitigate, and address harm and promote institutional and operational learning.

### **SCORE UNCOMMITTED**

The UK does not produce meaningful, publicly available analysis or insight to inform their practices on civilian harm mitigation. There is no public policy on how the UK facilitates institutional and operational learning.

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#### **What evidence exists to support this?**

There is no evidence available to the public to suggest that the UK MoD has a civilian harm tracking mechanism that is designed to produce lessons or meaningful analysis on civilian harm from UK military actions.

#### **What gaps/caveats are important to consider?**

Without basic transparency on the UK's approach to civilian harm mitigation, it is not possible to conduct analysis on strengths and areas of improvement in the UK's system for ensuring that civilian harm tracking feeds into analysis, if such a system exists.

## 2.3 COORDINATION WITH INVESTIGATION MECHANISMS

### INDICATOR DESCRIPTION

Tracking mechanisms interact effectively with other civilian harm investigations.

### SCORE **UNCOMMITTED**

There is no evidence available to the public on the interaction between the MoD's tracking and investigations mechanisms

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#### What evidence exists to support this?

- There is no information available to the public on how the MoD's tracking mechanisms interact with investigations. Yet without an effective tracking mechanism, harm reports are likely to be overlooked and not investigated.
- In a 2023 tribunal, a Deputy Director of the MoD team responsible for tracking and investigating harm admitted he was unaware of the standard of proof the UK used when investigating allegations of civilian harm, whether written procedure governed investigations, and whether the UK tracks allegations at a systemic level.<sup>16</sup>

#### What gaps/caveats are important to consider?

- Without an effective tracking mechanism, allegations of harm to civilians from UK actions are likely to be overlooked and not investigated.
- In a 2023 tribunal, a Deputy Director of the MoD team responsible for tracking and investigating harm admitted he was unaware of the standard of proof the UK used when investigating allegations of civilian harm, whether written procedure governed investigations, and whether the UK tracks allegations at a systemic level.

## 2.4 DATA MANAGEMENT

### INDICATOR DESCRIPTION

Tracking mechanisms have reliable access to accurate information and sufficiently detailed records about military operations (troop movements, airstrikes, incident reports).

### SCORE **UNCOMMITTED**

The 2018 JDP 3-46 on Legal Support in Joint Operations notes that Standard Operating Procedures (SOPs) on recording civilian harm exist, but these are not publicly available. There is no publicly available information on how data is archived and on which data and records assessments and investigations are based.

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#### What evidence exists to support this?

The 2018 JDP 3-46 on Legal Support in Joint Operations notes that Standard Operating Procedures (SOPs) on recording civilian harm exist, but these are not publicly available.

#### What gaps/caveats are important to consider?

Without basic transparency on the MoD's approach to data management on civilian harm, it is not possible to conduct analysis on strengths and areas of improvement in the UK's system.

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## RECOMMENDATIONS

### **Build - or strengthen - an institutional approach to proactively track civilian harm**

The MoD should proactively track civilian harm allegations from its own military action, using best practice methods including by reviewing open-source information, such as allegations emerging in the local language on social media channels or in local reports. The data gathered should be consistent across operations and deployments, and should include the sex and age of those harmed, their names, and more. Ensure strong data management on all allegations of harm to enhance institutional learning and strengthen mitigation of harm in ongoing and future operations.

### **Establish a reporting channel for external reports**

The UK should establish a reporting channel for civilians and third-party actors to report allegations of harm to the MoD, to ensure assessments and investigations are based on all available information (in line with partners and allies). Once an allegation has been reported, the MoD should make it clear when those involved should expect to hear back.

### **Use tracking mechanisms for operational learning**

Ensure that the primary purpose of tracking mechanisms is to understand and respond to harm caused and improve tactics in warfare to reduce future harm, as well as reporting on casualties and broader harm. This will align tracking efforts with the overarching goal of preventing civilian harm through operational and institutional changes; it will also improve the UK's ability to achieve military objectives.

### **Coordinate tracking and investigation systems**

The UK MoD should establish formalised coordination between civilian harm tracking systems and investigative mechanisms to ensure a consistent and reliable process. Standardising evidence collection and creating clear criteria for what constitutes 'credible' harm allegations would enhance the reliability of investigations and foster transparency.

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# 3 INVESTIGATIONS

Indicators: Investigates all credible reports;  
Conducts witness interviews and site visits;  
Reports of investigation; Interaction with response mechanisms; and Criminal investigations

## CATEGORY DESCRIPTION

Formal inquiries (often in the form of administrative or criminal investigations) that can be used to elucidate facts, to understand the cause of harm, to identify relevant state and/or individual responsibilities, to facilitate the appropriate response and/or remedy, and even to exonerate.

## OVERALL SCORE **UNCOMMITTED**

The UK has made commitments to investigate civilian harm allegations. However, this is undermined by a lack of transparency, consistency, and accountability on the UK's methodology and findings. While policies such as those used during ISAF in Afghanistan showed an intent to investigate civilian harm, allegations have recently emerged of extensive harm to civilians at the hands of UK special forces in Afghanistan, as well as efforts to cover these up. Campaigns launched after ISAF have seen less clarity on how allegations of harm are investigated and assessed.

## 3.1 INVESTIGATES ALL CREDIBLE REPORTS

### INDICATOR DESCRIPTION

Promptly investigates all credible reports of civilian harm, whether or not it is immediately clear that a violation of international law has occurred. Obtains relevant information from all relevant sources.

### SCORE **UNCOMMITTED**

There is no information available on the current methodology used by the UK to investigate civilian harm, how evidence should be submitted to the UK MOD, or what evidence is required for the MoD to find an allegation of harm 'credible'. The UK regularly reaches a different conclusion on allegations of harm than its allies and independent monitors; the UK MoD has also repeatedly admitted over the last ten years that it does not collate or hold figures on civilian casualties. Independent inquiries into civilian harm in past campaigns have repeatedly been terminated before their planned ends amid significant political pressure, with whistleblowers emphasizing that they had evidence of significant harm, at times amounting to war crimes.

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### What evidence exists to support this?

The UK MoD has committed itself to investigating allegations of civilian harm in several documents throughout the years. For instance:

- During the International Security Assistance Force (ISAF) multinational military mission in Afghanistan from 2001 to 2014, the UK provided some details on aspects of its investigations policy. A 2010 memorandum to Parliament, for instance, explains who is responsible for launching investigations into harm in this context, as well as the difference between UK and ISAF investigations.<sup>17</sup> However, the memorandum also conceded that, "The UK does not collate, publish or hold figures of civilian casualties in Afghanistan because of the immense difficulty and risks of collecting robust data. The operational environment in Afghanistan makes it difficult to monitor the overall number of civilian casualties. [...] However, where we are aware that a civilian casualty has occurred, a full investigation, as outlined above, is undertaken". For operations after ISAF, a comparable overview of who is able to launch an investigation is not publicly available.
- A 2016 email from J9 Permanent Joint Headquarters (PJHQ), released via a Freedom of Information request, states that in general: "The MoD conducts an assessment after every British strike of the damage caused which includes checks to see whether there are likely to have been civilian casualties. The MoD takes all allegations of civilian casualties seriously and analyses all allegations individually."<sup>18</sup> This has been reaffirmed in multiple parliamentary statements by Defence ministers.<sup>19</sup>
- In the 2018 JDP-3-46 on Legal Support to Joint Operations, the MoD outlined that, "There may be a need for more than one type of investigation. Investigations by non-Service authorities may be necessary. The decision on the most appropriate investigation will be made following policy, police and legal advice. [...] Types of investigation include a Service Inquiry, administrative investigation, sea/land/air accident investigations or after action review."<sup>20</sup>
- There are several bodies that can start or conduct an investigation into suspicions of civilian harm. Notably, external investigative bodies have been set up for specific deployment periods; this includes the Al-Sweady Inquiry, the Iraq Historic Allegations Team (IHAT), the Service Police Legacy Investigations (SPLI), Operation Northmoor and the Iraq Fatalities Investigations (IFI), the Iraq Inquiry and the Independent Inquiry Relating to Afghanistan.
  - The Independent Inquiry Relating to Afghanistan is currently ongoing. This Inquiry is examining allegations of harm to civilians at the hands of British special forces in Afghanistan between mid-2010 and mid-2013.
  - Service Police involved in the investigation of operational offending are involved in work to inform policy improvement, including by identifying gaps in training.
  - Since they were independent from the MoD, and the MoD had no reporting requirement to document implementation of recommendations, independent inquiries have limited power to impose policy changes.
  - As detailed below, several inquiries were closed before their scheduled ends.

### What gaps/caveats are important to consider?

The UK MoD's methodology is unclear when it comes to investigating civilian harm. It is unclear for instance, what the MoD considers an allegation worth investigating, what avenues should be used to submit allegations of harm, to what extent information from civilians and third-party actors, such as independent watchdogs, is included, who is responsible for launching and conducting investigations, if there is any form of independent oversight of investigations, and whether there is a policy dictating when the MoD reports on investigations, whether publicly or to those affected.

- The UK MoD admitted in 2021 that it does not hold information on the number of civilian casualties linked to British military activity since 2001.<sup>21</sup>

- The JSP985 on Human Security (2024) does not contain any information on investigations of civilian harm, even though it does recognise the possibility of harm resulting from UK operations.
- The UK has, on several occasions, acknowledged that it may have caused civilian harm beyond what it is currently admitting.<sup>22</sup> Yet, while it commits itself to investigating any new evidence that may emerge, it is unclear how such evidence should be submitted and what process will follow. Previous submissions of evidence by civil society organisations like Airwars, which contain evidence that the UK was ‘more likely than not’ responsible for strikes that allegedly caused civilian harm, have been rejected by the UK, even where the coalition agrees harm likely occurred.
- The UK appears to reject as ‘non-credible’ any allegation which they believe may not prima facie meet the criminal standard of proof, in contrast to the civil standard used by US and many official fact-finding bodies.<sup>23</sup>
- While independent reviews of civilian harm allegations have been commenced in the UK, for both Iraq (the Iraq Historic Allegations Team (IHAT)), and Afghanistan (Operation Northmoor), these have been terminated before their planned ends in the midst of significant political pressure. When it was shut down in 2017, 11 detectives working on IHAT told the BBC that the allegations they were examining amounted to war crimes. 52 allegations of harm to civilians from British Special Forces were initially to be investigated by Operation Northmoor, when it was shut down in 2019 before key Afghan witnesses could be interviewed by detectives.<sup>24</sup> While this may have been unlawful behaviour, and therefore does not reflect UK guidance to its troops, it indicates that the UK’s investigative systems require review. This is subject to the ongoing Independent Inquiry relating to Afghanistan.
- Detailed inquiries usually occur only after initial investigations are closed or fail, often due to failures in evidence disclosure or other procedural issues. These recurrent investigations are costly in terms of resources, soldiers’ welfare, and the MoD’s reputation.<sup>25</sup>
- The ICC Prosecutor claimed in 2021 that the Army’s initial investigations into possible war crimes in Iraq were “inadequate” and lacked a “genuine effort” to be independent or impartial.<sup>26</sup>
- During a tribunal in 2023, a senior MoD official admitted that he was unaware of the burden of proof used by the government to determine whether a civilian had been killed in an airstrike, revealing a lack of consistency in the UK’s approach to assessments and investigations.<sup>27</sup>
- There is an ongoing UK inquiry into alleged war crimes by Special Forces that focuses on accusations that SAS troops unlawfully executed Afghan civilians, particularly during night raids between 2010 and 2013. These include claims that unarmed men were killed in their homes, often described as a pattern of targeting males of ‘fighting age’. The investigation also examines a potential cover-up, where senior officials allegedly suppressed or failed to thoroughly investigate these actions. Two major military police probes, which previously found insufficient evidence, are under renewed scrutiny as part of the inquiry.<sup>28</sup> It is again important to note that these incidents do not reflect standing UK military guidance. Yet they do raise concern over the effectiveness of the UK’s internal reporting, investigation and transparency policies.

## 3.2 CONDUCTS WITNESS INTERVIEWS AND SITE VISITS

### INDICATOR DESCRIPTION

Investigating officers conduct site visits and/or conduct witness interviews or provide reasons why doing so is infeasible.

### SCORE **UNCOMMITTED**

There is no evidence of a structural approach within the MoD to conduct witness interviews or site visits.

### What evidence exists to support this?

There is little evidence available on the UK MoD’s current methodology when it comes to investigating allegations of harm to civilians.

- The Iraq Fatalities Inquiry, an investigation independent from the MoD, included witness interviews in its investigative methods.<sup>29</sup> Site visits do not seem to be common practice in investigations, to the extent publicly verifiable.
- The Service Police can conduct site visits, if the operational situation allows. However, it is unclear if there is a standardised methodology in place.

### What gaps/caveats are important to consider?

It is unclear what methodology the MoD itself applies in investigating allegations of harm, if there is a degree of standardisation, and whether its methods include witness interviews and/or site visits.

- There is no proof that the investigative methods used by external inquiries have been institutionalised within the MoD.
- Independent monitors, media outlets, and local NGOs have collated several allegations of harm from UK airstrikes in Iraq and Syria since 2014 based on witness interviews and site visits, yet these have not been acknowledged by the UK MoD. Conversely, the organisations that operate on the ground in the area where the UK claims its single civilian casualty from the OIR campaign was killed in 2018, found no recorded deaths in the area at the time of the purported strike and had no record of the UK MoD reporting such an incident to them, indicating that the UK did not conduct interviews with relevant Syrians on the ground.

## 3.3 REPORTS OF INVESTIGATION

### INDICATOR DESCRIPTION

Reports of investigations include a description of the process followed, the evidence consulted and included (including witness statements), information about its factual and legal findings, and recommendations for preventing a recurrence of civilian harm.

### SCORE **UNCOMMITTED**

The UK MoD does not report publicly on how its investigations are conducted, the process followed, the evidence consulted, its factual and legal findings, nor recommendations for preventing recurrence.

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### What evidence exists to support this?

- The MoD does not report publicly on how its investigations are conducted.
- Independent inquiries reported publicly via government websites. Reports of independent inquiries include a description of the process followed, the evidence consulted, information about factual and legal findings (if applicable) and sometimes recommendations. Yet these have no direct power over the MoD. The Service Police Legacy Investigations, for instance, which focused on allegations made by Iraqi civilians of serious criminal behaviour by UK Armed Forces in Iraq, released quarterly reports both in English and Arabic.<sup>30</sup> These investigations were independent from the MoD.

### What gaps/caveats are important to consider?

- In the past, the MoD has reported that the UK was not involved in specific incidents which are known to have caused civilian harm and/or that no civilian harm resulted from incidents that the UK was responsible for. These reports provide no detail on *how* the MoD reached its conclusion and the findings often do not align with the findings of allies or independent watchdogs. The same is true for the one civilian casualty that the UK has admitted from OIR, where the Secretary of Defence said simply that the MoD has undertaken “routine and detailed post-strike analysis”.<sup>31</sup>

## 3.4 INTERACTION WITH RESPONSE MECHANISMS

### INDICATOR DESCRIPTION

Investigations connect meaningfully to response mechanisms. Civilians who report incidents are informed of the possible response they can expect from the military responsible. Acknowledgements of harm following the conclusion of an investigation address the next steps in terms of amends.

### SCORE **UNCOMMITTED**

There is no evidence to suggest that the UK's investigations into allegations of harm connect meaningfully to any response mechanisms. There is no formal avenue for civilians to report allegations to the MoD and no communication on the process civilians can expect, if they do manage to report allegations. Amends schemes from past campaigns have been abolished, leaving no functional avenues for civilians to claim reparations.

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#### What evidence exists to support this?

Because of the limited information that is publicly available on how the UK conducts investigations or its approach to civilian harm response, it is largely unclear to what extent investigations meaningfully connect to response mechanisms.

- The only implicit mention of making amends for harm following an investigation can be found in the 2016 guidance for the stabilisation unit, which states that amends may follow from investigations if the conclusion is reached that procedures were not accurately followed: "Where mistakes occur they must be admitted to and remedial action taken as appropriate."<sup>32</sup> However, it is unclear to what extent this guidance is still relevant, as the unit was replaced in 2020.

#### What gaps/caveats are important to consider?

The UK had admitted only one civilian casualty from its extensive war against ISIS in Iraq and Syria. The existence of this civilian casualty is disputed, and there is no indication that the UK attempted to compensate the family of the person killed. There are no details on how the MoD reached its conclusions that it did not cause harm to civilians beyond this incident.

## 3.5 CRIMINAL INVESTIGATIONS

### INDICATOR DESCRIPTION

Incidents of a suspected criminal nature are referred to an independent, impartial investigative authority for investigating criminal violations.

### SCORE **UNCOMMITTED**

The UK has a strong focus on compliance with International Humanitarian Law in doctrine and guidance. The Service Police is responsible for investigating allegations of harm that may have breached international or national law. However, in practice, there are serious concerns about the effectiveness of these organisations in light of their role in allegations of repeated harm to civilians from British special forces in Afghanistan, and the cover-up that followed. The UK's investigatory practices have mainly been characterized by retrospective criminal investigations triggered by civil litigation. Official figures reveal only one prosecution of UK armed forces personnel for war crimes overseas in the last 24 years.

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#### What evidence exists to support this?

- The UK has internal processes for assessing potential criminality on the part of its Service personnel. For instance, if a Commanding Officer believes that a criminal act may have been committed or there has been a Rules of Engagement breach, they must report the matter to the Service Police.
- The Service Police is responsible for carrying out internal criminal investigations. The war crimes unit of civilian law enforcement may also conduct investigations.<sup>33</sup>
- Under the Armed Forces Act (2006) section 113, all commanding officers have a legal duty to report any possible serious offence that may have been committed to the service police.<sup>34</sup>
- Commanders are responsible for ensuring proper investigation of suspected unlawful activity. The 2018 JDP 3-26 on Legal Support to Joint Operations emphasises: "All personnel must be confident to use lethal force within the relevant

legal framework and, where applicable, rules of engagement. However, the need to investigate matters where either the law or our standards of conduct may have been breached is fundamental.”<sup>35</sup>

- In 2022, the Defence Serious Crime Command was formed which has taken responsibility for the investigation of all serious offences by service personnel. This sits outside the single services’ chain of command, to ensure operational independence.
- Official figures reveal one prosecution of UK armed forces personnel for war crimes overseas since 2001, and a further 14 prosecutions for other offences against the civilian population in Iraq and Afghanistan.<sup>36</sup>

### **What gaps/caveats are important to consider?**

- The UK’s investigatory practices have been narrow and reactive, primarily emphasizing retrospective criminal investigations triggered by civil litigation, such as IHAT, SPLI, and Operation Northmoor. Broader systemic issues have been addressed later through public inquiries and investigations like the Al-Sweady inquiry, and the Iraq Fatalities Investigations, highlighting a lack of holistic and proactive approaches.<sup>37</sup>
- There are serious concerns about the independence and effectiveness of Service Police investigations into serious offences, and whether they are always compliant with Article 2 of the European Convention on Human Rights. This has been the subject of two judicial reviews (the Saifullah and Noorzai cases), which were the basis of the Afghanistan Inquiry, and is now a main focus of the Inquiry.<sup>38</sup>
- The independent police investigations set up to investigate allegations of criminal violations, including IHAT, Operation Northmoor and SPLI (formed to complete the caseload of IHAT), have been shut down before their planned end dates with cases left un- and under-examined. Despite serious allegations that were perceived as amounting to war crimes by those working in these institutions, neither led to any prosecutions. The Prosecutor of the ICC opened a preliminary investigation into allegations of UK war crimes in Iraq in 2020. Evidence for war crimes were found, but these crimes were not prosecuted by the ICC.<sup>39</sup> The Court could not demonstrate an intent to shield perpetrators from criminal justice, but also did not rule it out.<sup>40</sup>
- During investigations into allegations of extrajudicial killings by UK Special Forces in Afghanistan, members of the SAS are accused of repeatedly and deliberately deleting evidence on the alleged crimes, hindering criminal investigations. This is currently being addressed by the Independent Inquiry Relating to Afghanistan.<sup>41</sup>

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## **RECOMMENDATIONS**

### **Standardise and institutionalise the UK methodology to assess and investigate allegations of civilian harm.**

The MoD should formalise and institutionalise its investigative methodology, including site visits, witness interviews, the use of open source information, and engagement with third party actors. It should clarify both its threshold for the evidence needed to launch an investigation, and the criteria for deeming an allegation ‘confirmed’ or ‘unconfirmed.’ Recognise that compliance with International Humanitarian Law requires continuous self-monitoring of state practice. Investigations are integral to state responsibility even if no crime is suspected.<sup>42</sup>

### **Use a sliding scale to determine the credibility of reports**

It is also recommended that the MoD uses a sliding scale to determine the credibility of reports rather than binary categorisation (credible versus non-credible), as adopted by allies and recommended by civil society experts. By institutionalising these practices, the MoD can build the capacity to respond swiftly to reports of civilian harm and avoid reliance on external inquiries.

### **Increase transparency and public reporting**

The MoD should improve transparency by regularly publishing reports on its investigations. These public reports should include descriptions of the investigation process, evidence consulted, legal and factual findings and recommendations for preventing future harm as well as a detailed consideration of the possible provision of amends. This would add legitimacy to the UK approach to investigating and responding to harm, a vital step in countering misinformation from adversaries.

### **Improve interaction between investigations and response mechanisms**

The MoD should develop a formal, transparent process to ensure that investigation findings are directly linked to response mechanisms, including ex-gratia payments and operational changes. This is in line with the practice of allies and recommendations from civil society groups.

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# 4 PUBLIC REPORTING AND TRANSPARENCY

Indicators: Discloses time and location of operations; Civilian harm reporting; and Public disclosure of process and records

## CATEGORY DESCRIPTION

Systems and procedures to ensure that the public and institutions of public oversight are made sufficiently aware of civilian harm, and to protect the right of victims to pursue remedy. Information may be limited or redacted due to privacy concerns for affected civilians, to safeguard other ongoing investigations or for national security reasons, but these reasons should not be abused and should be subject to review.

## OVERALL SCORE **UNCOMMITTED**

During OIR, the UK was very transparent on the time and location of its airstrikes, setting a strong example for allies. However, this practice has not been institutionalised or carried forward to new operations, such as those countering the Houthis in Yemen. The UK never reported consistently on civilian harm allegations. The MoD often highlights the difficulties in gathering data on civilian harm in conflicts, yet has failed to engage with international and local NGOs offering data and evidence, it has not taken on best practices used by allies and independent watchdogs performing this task in the same conflict zones, and it has not laid out a strategy for how it will address such challenges.

## 4.1 DISCLOSES TIME AND LOCATION OF OPERATIONS

### INDICATOR DESCRIPTION

Makes public information, to include time and location, of operations including airstrikes, except in circumstances when doing so would place civilians or security personnel at risk.

### SCORE **ENGAGED**

In the past, the UK has made public the time and location of its airstrikes against ISIS in Iraq and Syria, setting good practice for its allies. This practice, had it been continued, would have led to a higher score in this indicator. However, the UK's past focus on transparency on airstrikes was not institutionalised and has not been replicated in recent campaigns. Additionally, details on allegations of harm from the UK's strikes were not included in these regular updates.

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#### What evidence exists to support this?

- In the past, the UK has been relatively transparent when it came to releasing strike data during Operation Inherent Resolve (OIR) in Iraq and Syria against ISIS. In this campaign, the UK frequently released information on dates, approximate locations and intended targets for more than 1,700 airstrikes conducted by the RAF against ISIS. In 2022, the MoD released a list of every strike that had killed militants during its contribution to OIR in response to a FOIA request, including the date and location to city level.<sup>43</sup> The UK was the most transparent partner in the coalition on these details.
- This good practice has not been carried forward to the UK's most recent campaigns, such as Operation Prosperity Guardian and Operational Poseidon Archer against the Houthi forces in Yemen.

#### What gaps/caveats are important to consider?

While the UK releases information about location and time of some strikes, data released does not include information on civilian harm.

- The locations of airstrikes given by the MoD are often too imprecise to enable matching with on-the-ground reports of civilian harm by independent monitors. During the Raqqa assault, for instance, 80 percent of airstrikes were only identified by the Ministry of Defence at city level.<sup>44</sup> Best practice is a location given within ten metres.

## 4.2 CIVILIAN HARM REPORTING

### INDICATOR DESCRIPTION

Regularly issues and disseminates reports on civilian harm resulting from military operations that includes an estimate of casualties, the source of harm, the types of harm experienced, and the location of the incident(s) and any reasons for discrepancies with estimates or accounts from other sources such as NGOs or the media.

### SCORE **UNCOMMITTED**

While the UK MoD was leading the way on regular reporting on the date and location of airstrikes during OIR, it does not regularly release information on alleged or actual civilian harm caused by its military actions.

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#### What evidence exists to support this?

- The UK admitted to having caused a single civilian casualty during OIR, far below independent estimates. Additionally, media reporting and reporting by independent civilian harm monitor, Airwars, indicates that the airstrike which killed the single civilian was not recorded on the UK's own list of airstrikes that killed or injured militants, the US-led Coalition's records of strikes in which civilian harm was deemed 'credible', or any local media reporting or allegations from communities, suggesting poor internal reporting mechanisms and a lack of coordination with allies. Information

about this casualty was not released as part of the regular updates on airstrikes conducted in Iraq and Syria, but two months after the incident occurred.<sup>45</sup>

- In response to FOI requests, the UK has provided lists of allegations of harm to civilians with a summary for why it does not believe it caused civilian harm.<sup>46</sup>
- Updates on airstrikes during OIR often included a sentence emphasising that care was taken to avoid civilian harm before the incident.
- Prior to the anti-ISIS OIR Coalition, the MoD reported ad hoc on some allegations of harm and admitted to causing civilian harm at times.<sup>47</sup>
- While a 2016 guidance document for the stabilization unit reads, "Where civcas [civilian casualties] occur the STABAD [Stabilisation Advisor] must ensure that transparency is a key principle in the investigation process. Where mistakes occur they must be admitted to and remedial action taken as appropriate," it is unclear whether this is actually a standing policy. The unit was replaced in 2020 by the Office for Conflict, Stabilisation, and Mediation and it is unclear whether this guidance still applies.<sup>48</sup>

### **What gaps/caveats are important to consider?**

The UK does not appear to have an institutionalised system for gathering - and reporting on - allegations of civilian harm. As a result, there is little to no transparency on the impact to civilians of UK military action.

- Updates on airstrikes during OIR provided no details on efforts to understand the effect of the strikes on civilians after it had taken place, and did not recognise harm to civilians even where allies found such harm to be credible. The UK does not systematically or effectively issue information on civilian harm alleged to result from its military operations.
- The MoD has not released further information on the single civilian it claims to have harmed in Iraq and Syria during OIR, after The Guardian and Airwars revealed that the person does not appear to exist according to the UK's own records, the findings of allies, and evidence on the ground. The Secretary of State for Defence argued that providing more information was impossible, "given ongoing operations and consequent national security issues".<sup>49</sup>
- The UK frequently emphasises that it is impossible to gather data on civilian harm in the contexts it engages in, and that it therefore cannot report on it. Yet tangible lessons on best practices on civilian harm tracking and assessing presented by allies, notably the US, and independent monitors such as Airwars, which could drastically improve the UK's ability to gather data on civilian harm, do not appear to have been adopted.
- As the UK does not often acknowledge harm to civilians from its own strikes, the right of victims to pursue remedy is hindered.

### **The acknowledged civilian casualty event during Operation Inherent Resolve - UK**

In the UK's six-year involvement in Operation Inherent Resolve in Iraq and Syria, the British Ministry of Defence has acknowledged only a single civilian casualty resulting from its airstrikes. The UK contributed significantly to this coalition, and was second only to the US in the number of munitions dropped. According to the MoD, over 4,000 ISIS fighters were killed as the result of UK airstrikes.

This incident in which a civilian was reported killed involved an individual on a motorcycle in eastern Syria whom the UK claims was inadvertently killed during a targeted strike on an ISIS position. The MoD has maintained that extensive measures were taken to avoid civilian harm in all operations, and that this was an isolated, regrettable instance. However, the assertion of only one civilian casualty has been met with skepticism and criticism from independent monitors and human rights groups.

Investigative sources, including The Guardian and Airwars have contested this claim, arguing that the reported casualty does not align with documented incidents in the region, including CENTCOM reports.<sup>50</sup> Additionally, Airwars has reported numerous other incidents with civilian casualties that it attributes to UK operations, suggesting that the actual number is likely far higher than the single figure acknowledged. This discrepancy raises concerns about the transparency and accountability of UK military reporting practices.

## 4.3 PUBLIC DISCLOSURE OF PROCESS AND RECORDS

### INDICATOR DESCRIPTION

Releases information about mitigation tactics, investigative processes and records to the public whenever possible. Shares criteria applied when a person that is harmed is considered a civilian and criteria used for the “credibility” assessment and investigation of harm allegations.

### SCORE **UNCOMMITTED**

While the UK emphasizes that it takes the utmost care to mitigate harm to civilians in its military campaigns, it has not released information about mitigation practices or tactics for 15 years. There is no information available in the public sphere on how the UK determines the credibility of allegations of harm or how it conducts its investigations.

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#### What evidence exists to support this?

The UK has released some details about CHMR-related processes or records at times in past missions.

- During ISAF, the UK had an investigations policy on paper. A memorandum to Parliament from 2010 explains the procedure for investigating as well as the difference between UK and ISAF investigations.<sup>51</sup> The UK was also somewhat open about which factors hindered investigations and tracking during ISAF: “The UK does not collate, publish or hold figures of civilian casualties in Afghanistan because of the immense difficulty and risks of collecting robust data. The operational environment in Afghanistan makes it difficult to monitor the overall number of civilian casualties. Among the complicating factors is the removal in some cases of the dead and/or injured by local nationals before investigations could feasibly take place (Islam directs that bodies must be buried within 24 hours). UK forces may also need to vacate an area before an accurate assessment of the numbers of fatalities and casualties could be made and it is not feasible to have personnel on the ground at the site of each attack to ascertain the numbers of those killed or injured, particularly if the attack is airborne. It is therefore impossible to estimate with any confidence the number of civilian casualties in Afghanistan that have been caused by the current conflict. However, where we are aware that a civilian casualty has occurred, a full investigation [...] is undertaken.”<sup>52</sup>

#### What gaps/caveats are important to consider?

The UK does not systematically release information about mitigation tactics, investigation processes, or records on civilian harm. While it has done so for previous coalitions, it does not have a consistent national approach to this that applies across contexts.

- The MoD does not have a publicly available definition of civilian harm.
- While the MoD often cites its thorough mitigation tactics as a reason civilian harm is unlikely to have occurred, it remains vague about what these tactics are, how officers are trained in civilian harm mitigation or human security more broadly, and why the UK’s mitigation measures are assumed to be nearly 100 percent effective even in intense urban conflicts, where allies with similar mitigation measures acknowledge having killed over 1,000 civilians.<sup>53</sup>
- During OIR, the MoD had a strong focus on the dangers and roadblocks to recording civilian harm and collating data in air campaigns, without presenting a strategy to overcome these difficulties, such as adopting best practices from allies and independent monitors who are able to document harm in the same contexts.
- As the MoD has not released an up-to-date civilian harm assessment and investigations policy, it remains unclear how and why it determines allegations ‘non-credible’ or ‘credible.’
- Individual British military officers have on several occasions been accused of destroying evidence of potential war crimes, falsifying operational records, and failing to report civilian harm up the chain of command.<sup>54</sup> While these actions are not in accordance with standing UK guidance on reporting on and recording the use of force, they indicate that existing processes need to be strengthened and actively brought to the attention of service personnel.

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# RECOMMENDATIONS

## **Institutionalise reporting on use of force**

When it comes to OIR, the UK is among the most transparent states when it comes to reporting on the use of force in Iraq and Syria. This should be standardised across the MoD and other operations, such as Operation Poseidon Archer in Yemen. The data reported should be institutionalised and include time, date, and location within ten metres, in line with best practice.

## **Enhance transparency in civilian harm reporting**

The UK should regularly publish detailed reports on civilian harm resulting from its military actions, including the source, location, and nature of harm. These reports should explain any discrepancies with other estimates from NGOs or other independent sources as well as detail what mitigating measures were taken.

## **Establish comprehensive civilian harm reporting**

To enhance transparency, the MoD should implement a policy for routinely investigating and reporting on civilian harm beyond deaths and injuries, to also include reverberating and non-physical forms of harm.

## **Enhance oversight**

Establish an independent body – or empower an existing one, such as the Intelligence and Security Committee – to evaluate the MoD's transparency practices, ensuring that withheld information is justified and that the highest levels of disclosure are achieved without compromising security.

## **Prepare transparency policies for high-intensity conflict**

The MoD should ensure that transparency policies are actively applied in future operations, particularly as the military prepares for more complex and large-scale conflicts. This has vital importance, not only for the civilians likely to be affected by such wars, but also for legitimacy, the pursuit of military objectives, and the effectiveness of force protection.

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# 5 POST-HARM RESPONSE

Indicators: Process for amends; Acknowledgement; and Comprehensive, victim-centred condolence

## CATEGORY DESCRIPTION

Efforts to acknowledge and express condolence for harm, to include offers of monetary and non-monetary forms of post-harm assistance.

## OVERALL SCORE **UNCOMMITTED**

The UK currently has no national system for providing amends to those harmed by its military actions. During counterinsurgency operations in Iraq and Afghanistan, the UK government implemented a structured system for offering compensation for civilian harm and property damage. However, during OIR, there was a stark shift in policy, with no regular approach to ex-gratia payments to civilians. This appears to have been replicated in more recent operations, such as Operation Poseidon Archer in Yemen, which has led to allegations of civilian harm that the UK has not responded to. Additionally, legislative changes limiting compensation claims have further restricted civilians' ability to seek redress, effectively curbing the UK's willingness to acknowledge or compensate for harm altogether.

# 5.1 PROCESS FOR AMENDS

## INDICATOR DESCRIPTION

The government implements a functional, timely, and adequately resourced process to receive and process requests and proactively provides monetary and non-monetary amends for harm caused by operations.

## SCORE **UNCOMMITTED**

The UK does not currently have a process to provide amends to those harmed by its military operations. While it has provided amends in past campaigns, there is no evidence to suggest it has attempted to do the same in recent campaigns, even where it acknowledges that a civilian was killed as a result of UK military action.

### ~~What evidence exists to support this?~~

The UK's approach to condolence varies greatly depending on the theatre it is operating in.

- During counterinsurgency operations like ISAF, compensation schemes were quite commonplace, and civilians were able to report harm directly to British forces on the ground. The UK provided payments of at least £5.4 million in relation to Afghanistan (4,740 cases) and £26.4 million in relation to Iraq (1,893 cases) (figures from 2021).<sup>55</sup> This did not only include loss of life, but also property damage. A 2006 Report from the Foreign Affairs Committee states: "The UK does everything it can to avoid civilian casualties or damage to civilian property. When either of these do occur, the UK recognises its national responsibility to pay compensation promptly for valid claims."<sup>56</sup>
- During the NATO operation that the UK contributed to in Afghanistan, forms were provided in Pashto and Dari that Afghan civilians could use to file a claim for property damage.<sup>57</sup>
- In 2013, the Iraq Fatalities Investigations were started, not to determine civil or criminal liability but for cases where it had been decided that there was no realistic prospect of a conviction. The investigations served a purpose similar to a coronial inquest by providing the families of the deceased and the wider public with as much information as possible about the circumstances of the death.<sup>58</sup> Some investigations resulted in an ex-gratia payment.<sup>59</sup> Note, however, that these were not part of the MoD. A similar process did not exist for Afghanistan, resulting in a disjointed approach.

### What gaps/caveats exist?

The UK does not currently have a process to provide amends to those harmed by its military operations.<sup>60</sup>

- The approach taken during the counterinsurgency operations in Iraq and Afghanistan, was completely overturned during more recent counterterrorism air campaigns like Operation Shader in Iraq and Syria against ISIS. In response to Parliamentary questions in 2016, the UK Defence Minister stated: "In the special circumstances of operations in Iraq and Afghanistan HM Treasury authorised the Department to make ex-gratia payments in-theatre in appropriate circumstances to nationals of those countries who had suffered harm or damage as a result of UK military activities. No such authorisations are currently in force."<sup>61</sup>
- Although ex-gratia payments are no longer part of UK policy, civilians who suffer harm from UK overseas operations could in theory still submit a public liability compensation claim to the Common Law Claims & Policy (CLC&P), if the harm they suffered resulted from a violation of IHL by UK forces.<sup>62</sup> CLC&P Guidance provides contact details online for those wishing to enquire about compensation claims.<sup>63</sup> This information is provided in English only. Such claims, however, are unlikely to succeed in practice, as it will be difficult to overseas victims to gain a UK-based lawyer and they will not have access to the information available to the commander at the time of the attack.<sup>64</sup> Because of this, it is nearly impossible for victims to prove an IHL violation occurred.
- In July 2021, the UK Overseas Operations (Service Personnel and Veterans) Act was adopted.<sup>65</sup> The controversial Act sets a six-year time limit for bringing civil claims in relation to overseas operations. The only acts which are exempt from this six-year limitation are war crimes, crimes against humanity and genocide, and torture. It was created in 2020 in response to the large number of claims of civilian harm the UK faced from its military engagements. The Act also places a duty on the Government to consider derogating from the European Convention on Human Rights in relation to significant overseas military operations.

## 5.2 ACKNOWLEDGEMENT

### INDICATOR DESCRIPTION

The government publicly acknowledges responsibility for harm.

### SCORE **UNCOMMITTED**

The UK has acknowledged harm in past campaigns, but there is no evidence to suggest they have apologised to the victims or survivors directly. In OIR, when the UK accepted responsibility for a single civilian casualty, the Defence Minister called the incident “deeply regrettable,” but there is no evidence to suggest the MoD attempted to acknowledge the death to the family and loved ones of the civilian killed.

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#### What evidence exists to support this?

In some past cases, the UK has acknowledged cases of civilian harm.

- The UK reported incidents that harmed civilians during counterinsurgency operations prior to OIR and admitted responsibility for a single civilian harm incident in OIR.<sup>66</sup>
- The JSP 985 (2024) notes the following intention: “Where incidents, genuine or otherwise, are alleged, it is important that the UK engage appropriately in order to maintain public support. Losing their support can directly or indirectly impact the mission.”<sup>67</sup>

#### What gaps/caveats exist?

The UK reported on civilian harm from operations prior to OIR in an ad hoc manner, at times acknowledging that harm had occurred. However, there is no evidence to suggest that the MoD apologised to survivors and victims directly. There are significant gaps between the harm to civilians admitted by the UK and the level of harm found by allies and independent monitors.

- Generally, the UK refers to what it states are rigorous mitigation tactics to explain its position that UK operations have not caused civilian harm, although it remains unclear what such tactics would entail in practice.<sup>68</sup>
- While there is an example among the previously mentioned Iraq Fatalities Investigations that resulted in a voluntary compensation for harm, the UK explicitly stated that in making the payment, the British Army did not accept any responsibility for the civilian’s death.<sup>69</sup>

## 5.3 COMPREHENSIVE, VICTIM-CENTRED CONDOLENCE

### INDICATOR DESCRIPTION

Policies governing the offer and provision of condolences payments (monetary and non-monetary) should be broadly defined, culturally appropriate and sensitive to local needs as defined by those affected.

### SCORE **UNCOMMITTED**

The UK does not currently have a system to provide amends or condolences to the victims of its military action.

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#### What evidence exists to support this?

The UK does not currently have a system to provide amends or condolences to the victims of its military action.

#### What gaps/caveats exist?

As the UK does not currently have a response framework and actively hinders attempts to claim compensation for harm through legislation such as the Overseas Operations Act, it cannot be determined whether the UK would take a victim-centred approach in the case it would decide to provide amends.

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## RECOMMENDATIONS

### **Establish an enduring institutional approach to responding to harm to civilians**

A consistent and enduring approach to amends for civilian harm should be established to enable the effective processing of claims and requests, across different types of operations. When there is no ground presence, allow requests to be processed through embassies, bases, local intermediaries or online platforms, in line with best practice.<sup>70</sup> These processes must be accessible in the local language and include various types of harm. The amends schemes should be actively brought to the attention of civilians on the ground.

### **Take a comprehensive view of response**

Future compensation efforts should be informed by the needs and preferences of victims. The MoD should consult affected individuals and communities before implementing compensation projects, ensuring that both monetary and non-monetary forms of compensation are appropriate and culturally sensitive. The MoD's official policies should recognise a broad range of harms, including psychological, social, and economic impacts. This comprehensive definition of harm would allow for meaningful and effective responses to civilian harm and ensure that aspects of victims' losses are more comprehensively addressed.

### **Emphasise moral responsibility in amends policy**

While strategic arguments for response can help create buy-in for a progressive amends policy within the military, policies on amends should include an emphasis on the inherent moral responsibility of recognising and addressing civilian harm across different types of operations, incorporating a full spectrum of responses, including public acknowledgments and formal apologies.

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# APPENDIX

Glossary & Acronyms

# GLOSSARY

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## A

### **After Action Report (AAR)**

A retrospective analysis of a unit's action and its effectiveness, often written upon return to base.

### **Assessment**

A process in which reported civilian harm is analysed to determine responsibility and the necessity of further investigation.

## B

### **Battle Damage Assessment (BDA)**

An assessment of damage inflicted on a target from a stand-off weapon, most typically a bomb or air launched missile, directly following the engagement. Some militaries include an assessment of potential civilian casualties in their BDA process.

## C

### **Civilian harm**

A range of adverse effects to civilians caused by military operations. This can include direct, indirect and reverberating effects such as physical injury, death, destruction of infrastructure, destruction of cultural heritage, psychological trauma, loss of livelihood, environmental destruction.

### **Civilian harm mitigation and response (CHMR)**

The attempt to decrease risks to civilians in conflicts to prevent civilian harm from own operations, and how governments or military forces respond when harm does occur.

### **Civilian harm tracking**

A process to record, assess and analyse a range of negative effects on civilians caused directly or indirectly by armed actors who are parties to conflict. The primary purpose of civilian harm tracking is to identify the military tactics, strategies and operations which have negative consequences for civilians. The information gathered enables armed actors to respond appropriately to specific instances of civilian harm (for example, by offering compensation), and inform operational guidance and decision making in order to minimize future harm.

### **Collateral Damage Estimate (CDE)**

A formalised mathematical process used by target support cells to gauge the potential number of civilian casualties *before* conducting a strike. Accordingly, targeteers may alter the munitions, timing and other factors to decrease the CDE. Militaries often maintain a maximum CDE. Any strike where the CDE is higher then needs additional authorisation or cannot proceed at all. The details of the CDE process are usually classified.

## E

### **Ex-gratia payment**

A voluntary compensation payment made by a government or military to victims or survivors to amend civilian harm, either in-theatre or after time has passed. This payment is not an acceptance of legal liability.

## H

### **Human Security (HS)**

An approach that focuses on protecting individuals' safety and well-being by addressing a wide range of threats to their survival, livelihood, and dignity, including armed conflict, gender-based and sexual violence, human trafficking, cultural property destruction and other human rights abuses. The Protection of Civilians also falls under HS efforts.

## I

### **International Security Assistance Force (ISAF)**

A multinational military mission in Afghanistan from 2001 to 2014, established by United Nations Security Council Resolution 1386. ISAF's primary goal was to train the Afghan National Security Forces (ANSF) and help rebuild key government institutions, but it gradually also took part in combating the Taliban insurgency. The US, UK and The Netherlands contributed troops. A notable period is the command of General Stanley McChrystal from 2009-2010, in which greater emphasis was placed on protecting civilians through tactical directives.

## **Investigation**

A thorough administrative or criminal inquiry into civilian harm incidents following an initial assessment, in order to identify the cause of harm, potential mistakes during targeting processes and to determine responsibility and liability. In some cases, a review of response measures taken can be part of the investigation.



## **Operation Inherent Resolve (OIR)**

A US-led coalition campaign in Iraq and Syria to combat Islamic State that started in 2014 and is still ongoing. Also sometimes referred to as Combined Joint Task Force Operation Inherent Resolve (CJTF-OIR). The UK and The Netherlands are both part of the coalition.

## **Operation Poseidon Archer (OPA)**

An ongoing military operation by the United States and United Kingdom against the Houthi movement since January 2024. The UK and US have executed airstrikes in Yemen as part of this operation.

## **Operation Prosperity Guardian (OPG)**

A United States-led defensive coalition operation formed in December 2023 in response to Houthi-led attacks on shipping in the Red Sea. The British and Dutch Navy have contributed to protecting the passage of commercial ships in the Red Sea.



## **Protection of Civilians (PoC)**

Actions taken by states, international organisations and armed forces to shield non-combatants from a broad range of harm caused by own operations or other actors during conflicts or crises. It includes the safeguarding of civilians from physical harm, displacement, exploitation, violations of human rights, and facilitating the delivery of aid and support to vulnerable populations in conflict zones, especially in areas of armed conflict or instability.



## **Response/amends**

The remedial actions taken by militaries and governments after civilian harm has been caused. This can include actions such as the provision of (in-theatre) ex-gratia payments, formal or informal apologies, expressions of sympathy/condolence, providing medical care, reconstruction, etc. Response can take place both at the individual and community level.

# LIST OF ACRONYMS

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<b>AAR</b>	After Action Report
<b>BDA</b>	Battle Damage Assessment
<b>CHMR</b>	Civilian Harm Mitigation and Response
<b>CLC&amp;P</b>	Common Law Claims & Policy
<b>CSOs</b>	Civil society organisations
<b>DoD</b>	Department of Defense (US)
<b>EWIPA</b>	Explosive Weapons in Populated Areas
<b>FCDO</b>	Foreign, Commonwealth and Development Office
<b>FOI</b>	Freedom of Information
<b>ICC</b>	International Criminal Court
<b>IFI</b>	Iraq Fatalities Investigation
<b>IHAT</b>	Iraq Historic Allegations Team
<b>IHL</b>	International Humanitarian Law
<b>IS</b>	Islamic State
<b>ISAF</b>	International Security Assistance Force
<b>JDP</b>	Joint Doctrine Publication
<b>JSP</b>	Joint Services Publication
<b>LSCOs</b>	Large-scale combat operations
<b>MoD</b>	Ministry of Defence
<b>NATO</b>	North Atlantic Trade Organisation
<b>NDAA</b>	National Defense Authorization Act
<b>NGO</b>	Non-governmental organisation
<b>OIR</b>	Operation Inherent Resolve
<b>OPA</b>	Operation Poseidon Archer
<b>OPG</b>	Operation Prosperity Guardian
<b>PJHQ</b>	Permanent Joint Headquarters
<b>PoC</b>	Protection of Civilians
<b>RAF</b>	Royal Air Force
<b>SAS</b>	Special Air Service
<b>SOP</b>	Standard Operating Procedures
<b>SOF</b>	Special Operation Forces
<b>SPLI</b>	Service Police Legacy Investigations
<b>US CENTCOM</b>	United States Central Command
<b>UN</b>	United Nations

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