

CHAPTER 3.2

UPHOLDING HUMANITARIAN PRINCIPLES

'If this is humanity, then the word has lost its meaning.'

— Palestinian elder, Gaza

*The State of the Humanitarian System 2022 (SOHS)*⁵⁵ warned that the system was in 'a fight for core norms'. That fight was only the beginning of the struggle to conduct principled humanitarian action against the onslaught of intensified challenges in this period. Despite the commitment of frontline staff and volunteers, and the risks they took to adapt in insecure environments, humanitarian efforts struggled to protect lives and human rights on a meaningful scale in several key contexts (including Afghanistan, Gaza, Myanmar and Sudan) and to remain independent from the political interests of powerful actors (including donor governments). Debates over the validity of existing humanitarian principles raised tensions between neutrality and more explicitly political approaches to humanitarian action. The system's inability to effectively uphold its principles amid sharp withdrawal of assistance from people in need and attacks on international humanitarian law (IHL) risked undermining its legitimacy in the eyes of people affected by crisis. This underscored the need for more support for frontline actors and strengthened leadership to meaningfully grapple with the structural and political barriers threatening humanitarian mandates.

Intensified debates on humanitarian principles

The United Nations (UN) General Assembly looked to the Fundamental Principles of the International Red Cross/Red Crescent Movement when it created a set of guiding principles for humanitarian assistance in 1991.⁵⁶ The international humanitarian system continues to formally hold four humanitarian principles – humanity, impartiality, neutrality and independence (see [Box 2](#)) – as core standards. In this period, however, debates intensified around their moral value, relevance and practical utility.



Box 2: The humanitarian principles

- **Humanity:** Human suffering must be addressed wherever it is found. The purpose of humanitarian action is to protect life and health and ensure respect for human beings.
- **Impartiality:** Humanitarian action must be carried out on the basis of need alone, giving priority to the most urgent cases of distress and making no distinctions on the basis of nationality, race, gender, religious belief, class or political opinions.
- **Neutrality:** Humanitarian actors must not take sides in hostilities or engage in controversies of a political, racial, religious or ideological nature.
- **Independence:** Humanitarian action must be autonomous from the political, economic, military or other objectives that any actor may hold with regard to areas where humanitarian action is being implemented.

Source: OCHA (2022), <https://www.unocha.org/publications/report/world/ocha-message-humanitarian-principles-enar>.



61% of survey respondents said that the four principles largely capture what 'principled humanitarian action' meant to them

When we asked local and international humanitarian practitioners whether these four principles capture what 'principled humanitarian action' meant to them, 61% of survey respondents said they 'largely did'.^{ix} This reflects the varied perceptions on principles in this period across our research.

Protecting the four traditional principles has remained core for many humanitarian organisations, particularly those like the Red Cross/Red Crescent Movement, whose mandates and identity have

historical roots in those principles. As the changing methods of warfare (including cyberattacks) and misinformation have created increased security threats, the International Committee for the Red Cross (ICRC) and International Federation of Red Cross and Red Crescent Societies (IFRC) sought to strengthen external perceptions of their neutrality and independence to protect the security of staff and the efficacy of their operations.⁵⁷ Chapter 3.1 underscores the dangers that arise when combatants view humanitarian actors and infrastructure as targets. ICRC viewed the traditional principles as key to securing access, particularly when requiring sovereign governments' permissions in an 'increasingly polarized' world,⁵⁸ and to performing some of its key functions. The ICRC Director-General claimed neutrality enabled the organisation to act as a trusted intermediary in the exchange of detainees and hostages between Israel and Palestine: 'Neutrality does not mean silence; it meant presence, persistence, and an unwavering focus on the people caught between forces beyond their control.'⁵⁹

ix 31% said partially; only 8% said 'not at all'. Results were comparable between international and local actors: 56% of both 'largely' agreed and (4% of local actors said 'not at all', compared to 2% of international actors).



The UN Office for the Coordination of Humanitarian Affairs (OCHA) has also asserted the continued importance of the four principles for the broader humanitarian system by highlighting them in the 'Defend' pillar of the Humanitarian Reset, which focuses on principles, civilians and humanitarian space.

Some humanitarian organisations with different mandates that work in contested political contexts found the traditional principles more problematic. For some local staff, the top-down nature of the principles made them feel less like fundamental values and more like compliance 'imposed' by their international partners and donors.⁶⁰ For example, non-governmental organisations (NGOs) and civil society actors in Ukraine applying for humanitarian funding for the first time reported having to adopt new principles that changed their mandates, including dropping their existing support for military actors.⁶¹ Humanitarian staff in Gaza, Myanmar and Ukraine said it was impractical for humanitarian actors to remain neutral or independent against entities they saw as clear aggressors of conflict or perpetrators of atrocities. A national NGO representative in Ukraine explained:



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'We are already biased by the fact that we know exactly who our enemy is.'

Another explained that being neutral after Russia's invasion could alienate the people they tried to assist. One local humanitarian actor in Myanmar described assisting members of an armed group:



'Sometimes People's Defence Forces asked for food; we did give, because they are our brothers.'

People affected by crisis did not always agree with international perceptions of principled humanitarian action. They sometimes disagreed with international approaches to 'impartiality' and data-driven methods for targeting assistance to individual households, which could contradict their practices of collective sharing and perceptions of who in their community was vulnerable.⁶² For some communities affected by the climate crisis, principles protecting humanity missed out the environmental ecosystems their lives depended on.⁶³ Local political actors and people affected by crisis were also sometimes suspicious that 'Western' liberalism or other external agendas influenced the neutrality and independence of international humanitarian assistance.⁶⁴ People affected by crisis in Gaza



and Myanmar told us they wanted humanitarian actors to more actively resist oppressive political forces to stop longer-term harm.



The last few years saw greater calls at the policy level for the system to be more politically engaged



While tensions around neutrality and independence among local humanitarian organisations existed in previous SOHS periods, the last few years saw greater calls at the policy level for the system to be more politically engaged. For example, there were debates about whether activist approaches should be considered humanitarian and how organisations should approach publicly naming perpetrators of atrocities.⁶⁵ One commentator said:



'to say something about genocide in the middle of bloody genocide seems to be a breach of [some international actors'] humanitarian principles.'

There were some calls to think about explicitly moving the system away from neutral and independent positions. For example, an ODI Global and Network for Empowered Aid Response (NEAR) advisory panel recommended a stronger focus on justice to support humanity and face growing challenges,⁶⁶ while a *Lancet Commission* report called for the formal adoption of solidarity as a principle, highlighting its links with existing commitments on localisation and accountability.⁶⁷

In practice, applying the existing principles has always required a level of judgement. A Centre of Competence on Humanitarian Negotiation review cautioned that, without space for effective judgement and interpretation in context, 'principles risk becoming rigid formulations or performative assertions, rather than practical tools for achieving humanitarian outcomes'.⁶⁸ However, this period saw growing calls for a rethink of the principles, raising questions for what it might mean for organisations that rely on commitments to neutrality and independence for access, safety and influence to coexist alongside actors using more explicitly political approaches to upholding humanity. These may be challenging tensions for the system to navigate in an operating environment increasingly driven by politically complex crises.

Practical progress on principled humanitarian action

Mirroring these debates, survey data indicated uneven upholding of the principles in practice. When asked to rate implementation of the principles in their operating contexts, 78% of surveyed practitioners said implementation of *humanity* was 'excellent' or 'good'; 73% said the same for *impartiality*; 64%

for *neutrality*; and only 54% for *independence* – indeed, 20% rated implementation of *independence* as ‘poor’. Other research also indicated challenges translating the principles into practice: a 2025 review found that international NGOs (INGOs) in Sudan saw the principles as more of a ‘theoretical framework’ than practical operational support,⁶⁹ while a global survey the same year found that, when tested, humanitarians scored substantially higher on *defining* the principles than on questions that required *applying* the principles to real-world scenarios.⁷⁰

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Several guides and trainings aimed to help move the principles from theory to practice, including by Humanitarian Outcomes and the International Council of Voluntary Agencies (ICVA),⁷¹ but we found relatively few assessments evaluating how organisations integrated or followed them. Those we did find indicated constraints. Evaluations reported that the International Organization for Migration (IOM) lacked systems to monitor how staff understood or adhered to the principles and limited evidence that they informed decision-making by the United Nations Children’s Fund (UNICEF) in Yemen.⁷² A HERE–Geneva evaluation found humanitarian actors in Ukraine largely treated the principles as a tick-box exercise to obtain funding, and that international organisations did not meaningfully discuss their contextual relevance with partners. The evaluation stated: ‘Settling for reasonable compromises and sharing these decisions is not a weakness, but a crucial reflection of the principles having been taken into account.’⁷³ A review by the Centre for Competence on Humanitarian Negotiation found that, across agencies, gaps in organisational governance, leadership incentivisation and board oversight negatively influenced the practical operationalisation of the principles.⁷⁴

Given limited available assessments aggregating practical implementation of the principles, we continued to track practical performance over three key areas, discussed in turn.

1. Upholding principles while negotiating access

Domestic political actors were a strong influence on access patterns, sometimes with devastating effects on reaching people in great humanitarian need. Across all six of our country case-study contexts, local and international aid practitioners cited influence from government or de facto authorities. Local staff in Rakhine, Myanmar, contended with influence from the State Administrative Council (SAC) and the Arakan Army, while blockades by the Rapid Support Forces (RSF) in Sudan



and the Israeli government in Gaza severely hindered humanitarian actors' ability to reach large populations. The 2024 International Court of Justice (ICJ) declaration to allow aid into Gaza had limited effect: all 35 agencies that responded to an Oxfam survey in early January 2025 agreed that Israeli procedures continued to impede the response, and 95% of importing agencies reported regular delays to their supplies.⁷⁵ Evaluations also highlighted restrictive domestic influence in Ethiopia, the Horn of Africa, the Philippines, Türkiye and Yemen.⁷⁶

Across responses, compromises on impartiality, independence and neutrality were often made to preserve access – what one review called 'principled pragmatism'.⁷⁷ International actors sometimes cooperated with regimes and structures that oppressed parts of the population to gain access in Ethiopia, Guatemala, Gaza, Myanmar, Sudan and Syria;⁷⁸ their ability to push back varied by actor and context. In Afghanistan, smaller national organisations faced greater challenges in navigating



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administrative requirements set by the authorities, particularly when they did not have international partners to facilitate registration processes and interactions with relevant authorities. In Sudan, local Emergency Response Rooms stood firm against government pressure to absorb them into a state-run structure that might impede their access to people in non-Sudanese Armed Forces (SAF) areas.⁷⁹ In contrast, local humanitarian actors accused international actors of being too aligned with the SAF and of legitimising its governance through their selective engagement at the start of the conflict.⁸⁰

Humanitarian organisations commonly negotiated with de facto authorities or armed actors to secure access, often without clear guidance from donors on whether such engagement was permissible and on their level of organisational protection.⁸¹ Local humanitarian actors in the Democratic Republic of the Congo, Myanmar and Sudan told us that negotiating – and sometimes cooperating – with armed groups was the only way to reach people in need of assistance and protection in contested contexts. Beyond government authorities, humanitarian organisations operating in Latin America and the Caribbean gained experience of negotiating access with gangs and criminal armed groups.⁸² Research on Colombia, El Salvador, Honduras, Haiti and Mexico found a range of successful strategies, including passing information or messages through community intermediaries or training staff on how to answer gang leaders' questions about their mandates and activities.⁸³



Engagement with armed groups was not, however, a guarantee to access and acceptance. For example, the UN High Commissioner for Refugees' (UNHCR) coordination with the government and with the Tigray People's Liberation Front in Ethiopia aroused suspicion from Eritrean refugees, who had been targeted by both in the conflict.⁸⁴ Further, members of the Sudanese Emergency Response Room were concerned that accompaniment by armed groups would limit communities' acceptance of their presence. These examples stress the need for contextually tailored approaches.



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Frontline staff, who typically shouldered the burden of negotiation, required more training on navigating tensions over access and principles, more political backing and clearer organisational guidance on 'acceptable levels of compromise'.⁸⁵ In some cases, however, negotiation was constrained by force. One national NGO staff member in Goma said:



'A responsible of an armed group, who was at the distribution site, requested for something from the aid. He was not on the list, so you can imagine you, as [a] humanitarian actor – guns are there – what can you do?'

While pressures on staff often stemmed from the environment, they were sometimes exerted by their own organisations, with negotiators requiring skills but also more space to exercise their judgement and balance competing priorities.⁸⁶ In one study, negotiators reported that new technologies enabled constant communication and demands from multiple layers of internal management that made 'counterparts more entrenched, negotiators more cautious, managers more burnt out, headquarters antsy, and donors more demanding'.⁸⁷

Collective access structures provided some support to individual humanitarian staff and organisations in this period. As discussed in [Chapter 3.3](#), several enabling agencies^x provided guidance and training to international and local actors to strengthen access-negotiation skills. In 2024, Humanitarian Access Working Groups (HAWGs) were active in 25 responses.⁸⁸ Research by the Norwegian Refugee Council (NRC) and the Global Interagency Security Forum (GISF) indicated that, while HAWGs had some positive influence on humanitarian engagement with non-state armed groups and de facto authorities, their overall

^x For example, actors like the Centre for Humanitarian Dialogue, Geneva Call, Centre on Armed Groups and the Centre for Competence on Humanitarian Negotiation.



impact on access was constrained by limited resources to train frontline staff, high turnover of Chairs, lack of local and national NGO (L/NNGO) membership and varying support from humanitarian leadership, including Humanitarian Country Teams (HCTs).⁸⁹ Political environments also hindered engagement. For example, several national NGO actors in Afghanistan were uncertain about the level of confidentiality of HAWG mechanisms. Beyond HAWGs, research highlighted national NGO forums as key actors in supporting access in multiple contexts; for example, the Northeast Syria NGO Forum produced analysis and provided training at the area level.⁹⁰

The 2025 funding cuts raised concerns about defunding these access-support structures. Interviewees told us there had already been a reduction in conflict-sensitive resource centres in Sudan and South Sudan, and they noted a growing tendency for organisations to subsume access-support staff and functions under security roles when making reductions. Reflecting on 20 years of working on access that could be relevant for the new constrained system, the Centre on Armed Groups highlighted the role of local NGOs and community-based



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organisations – who have contextual knowledge and trusting relationships with communities. It recommended that international actors move from capacity-building to providing security and political cover for these organisations: ‘Stand behind them when agreements collapse or retaliation occurs.’⁹¹

Despite challenges to the system’s funding and legitimacy in this period, it is important to recognise that committed frontline humanitarians adapted, innovated and risked their lives to maintain access to some of the people most in need of assistance. In Ethiopia and Somalia, L/NNGOs and civil society organisations provided a lifeline to communities

in conflict, even while experiencing trauma themselves.⁹² In Gaza, a local aid coordinator explained the critical contributions of humanitarian staff:



‘[They] assumed roles as negotiators, crisis communicators and on-the-ground protectors, improvising in real time to deliver life-saving aid.’

Humanitarian actors in several contexts maintained access by switching their mode of delivery, including breaking up distribution into smaller batches, employing vendors to conduct difficult deliveries or using cash – rather than convoys of trucks – to reduce physical protection risks. From Myanmar to Palestine to Ukraine, humanitarian actors talked of ‘zero profile strategies’ and pushing



back on donor requests to make their assistance publicly visible. One UN staff member told us:



'We made aid invisible to keep it possible.'

Despite stringent efforts to continue protecting and assisting people affected by crisis in multiple insecure contexts though, the impact of frontline staff was ultimately constrained by factors outside their control. As one local authority in Gaza said:



'Adaptation cannot overcome a political wall.'

2. Maintaining presence while protecting human rights

Successive SOHS reports have documented the humanitarian dilemma of staying quiet to deliver humanitarian assistance versus standing up to protect people's human rights and risking ejection by sovereign states. These risks loomed large in this period, and collective or leadership structures to support individual international and local humanitarian organisations were limited in their presence or effectiveness. Our in-country research highlighted strong failures of human rights protections for people affected by crisis, particularly in Afghanistan, Gaza, Myanmar and Sudan. Evaluations indicated that international actors in contexts like Afghanistan, Northern Ethiopia, Türkiye and Yemen struggled to agree collective 'red lines' for engaging with governments, de facto regimes and parties to conflict accused of oppressing populations,⁹³ while in Yemen agencies that took more vocal stances 'found themselves exposed and alone'.⁹⁴

Local humanitarian staff and people affected by crisis continued to criticise international humanitarian actors for not taking a sufficiently vocal or political stance to protect human rights in several contexts. The state-centric or depoliticised responses of international actors in Gaza, Myanmar and Sudan were criticised for 'propping up systems of injustice and overall suffering of the people'.⁹⁵ Indeed, some internally displaced people in Karenni told us what they needed most from international humanitarian assistance was an arrest warrant for the military junta leader and for countries to stop selling fuel to Myanmar.

International humanitarian actors often struggled to navigate government policies while respecting displaced people's human rights. A review of the



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Inter-Agency Standing Committee's (IASC) work on internally displaced people indicated that humanitarians required more high-level support from the Resident Coordinator or Humanitarian Coordinator, through strengthened accountability structures, to push back on states' coercive strategies.⁹⁶ This was echoed in our in-country research. Sudanese NGOs reported international actors staying silent as police used tear gas to clear internally displaced people from schools, and of these actors complying with directives to stop assisting those people, so as to encourage them into camps. One internally displaced man explained:



'The camps were not ready yet, they still had trees and bushes, snakes and insects ... For three months, nothing was given to schools to push people out.'

Local civil society actors in Poland experienced some success having advocated for the government and international partners to extend assistance for Ukrainian refugees to non-Ukrainian people in need. However, there were limits: while non-Ukrainian nationals who had left Ukraine were subsequently included in international humanitarian assistance, Polish government policy restricted support for people fleeing from Belarus to Poland. Several local civil society actors saw this as a double standard. One local NGO staff member said:



'Discussion about principles is just weak, we see it as weak when we think about [the] Belarusian border.'

Humanitarians' inability to protect the rights of large parts of the population was particularly stark in some politically restricted contexts. For example, international actors took varied approaches in Afghanistan as restrictions on women's and girls' rights intensified. While leadership engagement by the Emergency Relief Coordinator, IASC principals and Emergency Directors Group enabled a collective stance on protecting female Afghan staff, agencies largely had to navigate other positions vis-a-vis engaging with the De Facto Authorities (DFA) alone.⁹⁷ As discussed in [Chapter 1.2](#), humanitarians' ability to serve women and girls was limited, while the restrictions imposed by the authorities, funding cuts and a strict NGO re-registration process in 2024 stifled the advocacy – and very presence – of local women-led organisations. Some of these organisations were able to continue programming on women's empowerment through DFA-friendly blended food security and livelihood programmes. Data presented in an Inter-Agency Humanitarian Evaluation (IAHE) report suggested that many women supported the continued presence of international assistance but opposed the DFA policies that affected women and girls.⁹⁸ Some observers questioned whether continued humanitarian engagement – particularly in the absence of stronger public advocacy on issues affecting women – would contribute to the continuity of existing governance structures and policies.⁹⁹



Blockades and sieges represented one of the starkest human rights challenges in this period, with humanitarian advocacy varying by context. UN agencies had no collective access strategy for the Government of Ethiopia's blockade of Northern Ethiopia,¹⁰⁰ while 29 donors made a joint appeal to the RSF to provide access to El Fasher in Sudan.¹⁰¹



Blockades and sieges represented one of the starkest human rights challenges in this period



Israel's blockade on Gaza elicited a range of advocacy responses. While ICRC maintained its neutrality with the aim of enabling its operations and keeping doors open and dialogue possible,¹⁰² several entities were more vocal – including INGOs (like Médecins Sans Frontières (MSF), NRC and Oxfam) and other networks and coalitions of civil society actors, for example some Israeli human rights actors.^{xi} However, interviewees said it was local voices from Gaza (including the Palestinian NGO Network) who drove much reporting on famine, water shortages and destruction so:



'... the Palestinian narrative during the war reached the entire world.'

For many organisations, being more vocal about human rights came at a cost. Governments and de facto authorities increasingly used bureaucratic and administrative impediments (BAI) to restrict human rights work, affecting timely access and continued presence through technical confusion, insecurity, harassment, intimidation and violence.¹⁰³ These restrictions affected both local and international organisations in multiple contexts. For example, in Afghanistan, in-person re-registration requirements presented challenges for some women leaders who were outside the country, as well as for women-led organisations operating within the existing regulatory environment. In some cases, organisations adapted their leadership and representation arrangements, with men assuming public-facing roles while women continued to contribute to organisational leadership and decision-making.

There were some increased efforts to help humanitarians navigate bureaucratic challenges, including peer-engagement sessions for Myanmar organisations (led by the Centre of Competence on Humanitarian Negotiation)¹⁰⁴ and the IASC Framework for a System-wide Approach on Understanding and Addressing BAI,¹⁰⁵ although research indicated that socialisation of the latter was limited and humanitarians wanted more support from HCTs and HAWGs.¹⁰⁶ Other locally led initiatives emerged, including work by Community World Service Asia to support agencies in Pakistan and the broader region against closing civic space.¹⁰⁷

xi Networks and coalitions of NGOs made joint advocacy statements in favour of ceasefires or against mass starvation (see Aloudat (2025) <https://www.thenewhumanitarian.org/opinion/2025/07/28/why-humanitarians-must-act-end-israels-genocide-gaza>; Van Ho (2023) <https://www.bond.org.uk/news/2023/11/understanding-the-basics-of-international-humanitarian-law/>; Action Against Hunger et al. (2025) <https://www.un.org/unispal/document/ngos-statement-non-un-document-23jul25/>). Human rights actors in Israel also sought to pressure their government to curb its attacks on Palestinians, with both B'Tselem and Physicians for Human Rights Israel publishing reports that called out the genocide in 2025 (see B'Tselem (2025) https://www.btselem.org/sites/default/files/publications/202507_our_genocide_eng.pdf; PHR (2025) <https://www.phr.org.il/wp-content/uploads/2025/07/Genocide-in-Gaza-PHRI-English.pdf>).



One INGO reported being expelled from at least three contexts in this period because they felt a responsibility to speak on human rights abuses when others could not



Israeli bureaucratic and administrative restrictions placed large constraints on international actors in Gaza. The government denied the visas of senior international humanitarians from INGOs and UN agencies; it continually attacked staff of the UN Relief and Works Agency for Palestine Refugees in the Near East (UNRWA), its offices and operations; and, in December 2025, issued a notice for all international agencies to re-register and provide detailed information about Palestinian staff – or cease operations.¹⁰⁸ NGOs jointly argued that the level of rejected registrations would collapse

systems already stretched to the brink.^{xii} Fears of such system collapse sometimes tempered the actions of more vocal organisations in different humanitarian contexts. One INGO reported being expelled from at least three contexts in this period because they felt a responsibility to speak on human rights abuses when others could not, but they were quieter in contexts where few other INGOs were present to deliver assistance.

The 2022 SOHS found that high-level advocacy for respecting international norms appeared to be at a low point. The 2022–25 period revealed an even greater need to shore up not only advocacy but the political levers that could add more tangible pressure and accountability on human rights violators. Some donors continued to invest in operational partners' protection advocacy, such as the Directorate-General for European Civil Protection and Humanitarian Aid Operations' (DG ECHO) support for UN agencies and the Red Cross/Red Crescent Movement, while an IASC Principals Collective Advocacy pilot was launched in 2023.¹⁰⁹ UN advocacy against atrocities in contexts like Gaza and Sudan was particularly scrutinised. While UN processes were slower to recognise the genocide in Gaza than civil society groups, some UN leaders made strong public statements against growing atrocities.¹¹⁰ For example, Emergency Relief Coordinator Tom Fletcher delivered a speech to the UN Security Council in May 2025 that marked a step-change in language: 'Israel denies us access, placing the objective of depopulating Gaza before the lives of civilians. It is bad enough that the blockade continues. How do you react when Israeli Ministers boast of it? ... Will you act – decisively – to prevent genocide and to ensure respect for international humanitarian law?'¹¹¹

Humanitarian actors, however, are not solely responsible for upholding human rights in contexts affected by crisis. The Commissioner General of the UNRWA underscored the limits of individual agencies' efforts to protect staff and

xii Israel's suspension of Gaza aid NGOs will have deadly consequences. While outside the study period, there were some signs in 2026 that the Israeli High Court would push back on expulsion attempts (see Oxfam (2026) <https://www.oxfam.org/en/press-releases/reaction-israeli-high-court-grants-urgent-request-19-humanitarian-organisations>; see also ACF et al. (2026) <https://reliefweb.int/report/occupied-palestinian-territory/53-international-ngos-warn-israels-recent-registration-measures-will-impede-critical-humanitarian-action>).



mandates without member states holding perpetrators accountable.¹¹² In this period, Global-Majority governments played some of the strongest roles in standing up against such abuses.¹¹³ For example, in December 2023 South Africa submitted the case to the ICJ that Israel was acting with intent to commit genocide in Gaza,¹¹⁴ and in January 2025 several states created the Hague Group (with South Africa and Colombia as co-chairs) to defend international law and solidarity with the people of Palestine.^{xiii} It is also notable that an ICRC Global Initiative to Galvanize Political Commitment to International Humanitarian Law was jointly launched in 2024, with representation from Brazil, China, France, Jordan, Kazakhstan and South Africa.¹¹⁵

3. Preserving independence from donor interests

Beyond in-country conditions and local political influence, the domestic politics and foreign-policy goals of humanitarian donor governments continued to influence both allocations of assistance and the humanitarian actors who delivered it.

Reductions in government donor funding forced humanitarians to make tough decisions over who to support, which made it difficult to fulfil commitments to humanity and impartiality. Meanwhile, donor countries' self-interested approach to assistance (identified in previous SOHS reports as a barrier to neutral and independent humanitarian action) became more overt. Early in the period, disproportionate funding for the Ukraine crisis over larger-scale humanitarian crises like Sudan underscored the interests of Western parliaments and publics in crises that were directly tied to their own security or felt close to home. Despite the broader cuts, several European donors told us that parliamentary pressures meant their budgets for Ukraine would remain high in 2026.

Donor countries' self-interested approach to assistance became more overt

New foreign policy from the United States raised concerns among commentators and many senior humanitarians we spoke to that new pledges would be skewed towards US interests and subject to strong geographic and diversity, equity and inclusion restrictions, potentially threatening the impartiality of assistance.¹¹⁶ However, at the time of writing, new US funding pledged to OCHA has been exempt from the restrictive Protecting Human Flourishing in Foreign Assistance policy.¹¹⁷

As discussed in [Chapter 1.1](#), Gulf donors in this period often targeted their funding to humanitarian crises in their close geographical region rather than addressing broader humanitarian needs. They also tended to channel funding through governments rather than civil society. Some people affected by crisis in Sudan told

xiii See <https://thehaguegroup.org/home/>



us of their suspicions that funds from Qatar and Saudi Arabia that flowed through the government were not always used impartially to support humanitarian needs. Chinese humanitarian funding has been harder to track; some research suggests that, while there have been recent evolutions in China's humanitarian approaches, its efforts remain tied to diplomatic objectives.¹¹⁸ When China responded rapidly to the 2025 earthquake in Myanmar, the reactions of other humanitarian actors in the country were mixed. Some NGO staff told us China's support was directed to areas with a higher population of Chinese speakers, but they recognised that this may have been directed more by the State Administrative Council than by China itself. One INGO respondent said:



'China was quite proactive in the earthquake situation. I think we also need to give them some credit at this part. Of course, they also have their own interests.'

While the self-interested nature of some donor states may have become more overt, political interests around security remained an obstacle to both the independence of assistance and the protection of people affected by crisis. At the UN Security Council, Russia continued to veto access to Syria and resolutions on Ukraine, the US consistently vetoed ceasefire resolutions for Gaza,¹¹⁹ and other protracted crises (like Myanmar, Ethiopia and Venezuela) received little attention. Donor governments were also implicated in funding armed actors that perpetuated conflict: Russia was the leading supplier of weapons to the Assad regime in Syria;¹²⁰ China provided economic support to Russia's war in Ukraine;¹²¹ Iran and Russia provided weapons to the Sudanese Armed Forces;¹²² Saudi Arabia continued to channel weapons to the RSF in Sudan and armed groups in Yemen;¹²³ British-manufactured weapons were discovered in RSF hands;¹²⁴ and the US and several European states continued to sell weapons to Israel following the ICJ ruling on provisional measures to protect Palestinians from genocide. While some countries have since stopped, the US continued to support Israel with arms supplies and deployment of forces throughout 2025.¹²⁵ The provision of arms and weapons with high risk of harm to civilians was a growing concern, including with regards to Ukraine's use of cluster bombs supplied by Germany.¹²⁶ There were concerns in this period from human rights scholars that the power of the 'responsibility to protect' norm to protect civilians from atrocity was being hollowed out, with a greater focus on state sovereignty.¹²⁷

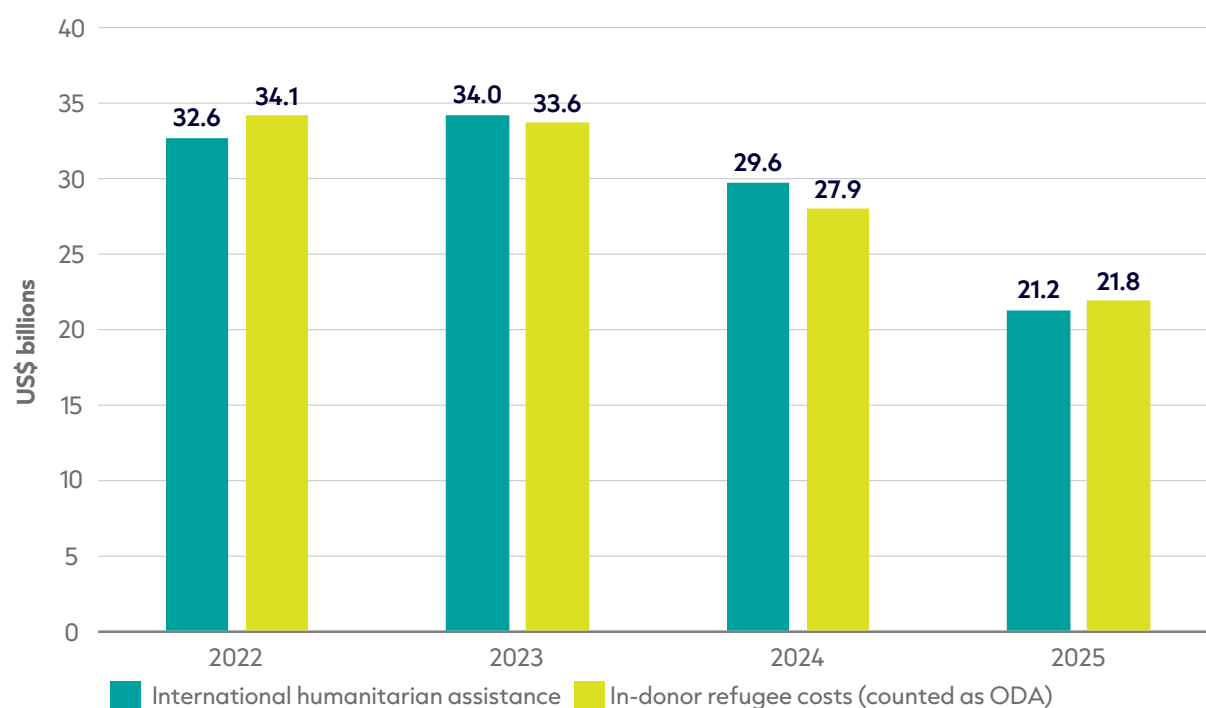
Donor strategies also remained tied to domestic migration concerns.¹²⁸ Research highlighted increasingly blurred lines between assistance from donors, military support and border management.¹²⁹ While 'whole of government approaches' could be consistent with cohesion across the humanitarian–development–peace nexus, they could risk tying humanitarian work too closely with domestic migration



objectives.¹³⁰ For example, the US Collaborative Migration Management Strategy provided assistance to Central American countries while also providing UNHCR with funding to support Guatemala and Mexico's asylum systems.¹³¹

In this study period, donors also classed a significant amount of their in-donor refugee costs (IDRC) as official development assistance (ODA), crowding out additional international assistance. While aggregate amounts for international humanitarian assistance (IHA) were slightly higher than IDRC, IDRC consistently exceeded total IHA from 32 Development Assistant Committee (DAC) donors each year from 2022 to 2025 (see Figure 3.7). The three largest reporters of IDRC were the US, Germany and the United Kingdom. For Germany, Canada and Italy, the IDRC spent domestically was at least double the amount of IHA these countries provided in 2025.

Figure 3.7: In-country refugee costs (IDRC) counted as ODA compared to IHA for DAC donors, 2022–2025



Source: ALNAP analysis, based on data from the Organisation for Economic Co-operation and Development (OECD) DAC, OCHA's Financial Tracking Services (FTS) and the UN Central Emergency Response Fund (CERF).

Notes: 2025 data is preliminary. European Union (EU) institutions and Australia are excluded from the calculations and from this graph as both are the only DAC members that do not report any in-country refugee costs as ODA. Data is in constant 2024 prices.



Evaluations and studies found that donor states' counterterrorism policies and finance or trade sanctions had negative effects on NGOs in this period. Global Interagency Security Forum research concluded that donors had shifted 'the burden of responsibility on[to] the humanitarian sector to demonstrate compliance and reliability primarily as allies in counterterrorism efforts, rather than as neutral and principled partners'.¹³² Effects included reduced efficiency

due to delays, inability to import dual-use items and interrupted funding and programming for people affected by crisis.¹³³ Restrictions disproportionately fell on organisations representing women and girls; religious or ethnic minorities; and lesbian, gay, bisexual, trans, queer, intersex or other gender identities (LGBTQI+).¹³⁴ Examples from our in-country research described these impacts and the lack of uniform approaches to compliance.

A nutrition-cluster representative in Afghanistan told us of donor reluctance to fund Integrated Food Security Phase Classification (IPC) analysis if the DFA were involved, and a local NGO representative in Palestine recounted donor reactions following Hamas's attacks on Israel on 7 October:



'A major shock is that we began receiving messages from some donors informing us that they were suspending their funding ... Direct sanctions [were] imposed on people.'



Donors also classed a significant amount of their in-donor refugee costs as official development assistance



Some progress was made in this period to relieve some regulatory restrictions associated with counter-terrorism policies and sanctions, including the adoption of UN Security Council Resolution 2664 in 2022,^{xiv} changes to the Financial Action Task Force Recommendation 8 for non-profit organisations^{xv} and new EU Council exemptions.¹³⁵ While some organisations saw these steps as helpful, problems remained due to inconsistency between international and domestic approaches and limited understanding – among both humanitarians and financial institutions – on navigating these challenges.¹³⁶ Donors and agencies made some efforts to make sense of these processes: NRC produced a toolkit on managing sanctions and counterterrorism risks;¹³⁷ the Dutch government continued to convene a successful roundtable initiative on financial access for non-profit organisations;¹³⁸ the demining sector shared learning on importing equipment that could be considered military and dual-use;¹³⁹ and the UK Foreign, Commonwealth and Development Office's (FCDO) guidance on Syria brought together and clarified restrictions and safeguards under sanctions, counterterrorism and export controls.¹⁴⁰ To build on emerging good practice, however, more cross-sector dialogue and trust-building between financial and humanitarian actors are needed.¹⁴¹

Donors tried to reduce the impact of some of these influences for operational agencies, including around sanctions, but more collaboration is required to support principled humanitarian action. Existing donor coordination structures held limited promise. For example, a 20-year review of the Good Humanitarian

xiv Known as the 'humanitarian carve out' (see UN (2022) <https://main.un.org/securitycouncil/en/content/sres2664-2022>).

xv Recommendation 8 stated that 'countries should identify the organisations which fall within the [Financial Action Task Force] definition of non-profit organisations (NPOs) and assess their terrorist financing risks'. The amendments were designed to address the misapplication and misinterpretation of Recommendation 8, which had led countries to apply disproportionate measures on non-profit organisations.

Donorship Initiative (GHDI) highlighted strengthening adherence to humanitarian principles and IHL as a common future goal, but it found a lack of direction within the GHDI's purpose and activities, and difficulty maintaining consensus and momentum in an increasingly diverse group. Donors saw smaller informal gatherings on specific common issues as more effective vehicles for progressing issues than the GHDI.¹⁴² Such spaces are now particularly important for donors to collectively reflect on changes caused by the cuts and the Humanitarian Reset and how they can drive forward a more principled system in a challenging context.

In practice, the system came up against huge challenges in upholding its principles

Conclusion

At the policy level, the 2022–25 period was characterised by debates on whether humanitarian principles were fit for purpose and whether – and how – to employ varying levels of neutrality, independence, solidarity or justice in pursuit of humanity. Tensions were exposed between organisations dependent on neutrality for their operations and those calling for a greater focus on solidarity and justice as humanitarian principles. In practice, the system came up against huge challenges in upholding its principles. Operational organisations' efforts to support people with humanity and impartiality were undermined by governments' and de facto regimes' increasingly repressive policies, their political blockades of large numbers of people experiencing vulnerability and their growing responsibility for attacks on aid workers, as well donor states' drive towards greater self-interest.

Frontline staff, volunteers and operational agencies proved their ability to adapt and evolve to reach people, system support structures sought to ease access, and several local and international humanitarian organisations publicly advocated for the rights and lives of people affected by crisis. But accountability for supporting humanitarian principles was missing at the structural level: powerful states exerted little pressure on perpetrators of human rights abuses and atrocities.

The gaps in this period indicate that the humanitarian system requires stronger leadership at country, UN and donor levels to support individual humanitarian actors to determine and navigate red lines of engagement – and to provide political backing when attempts to uphold their principles put them at risk. Progressing on these issues is important if humanitarians are to repair the system's dented legitimacy in the eyes of people affected by crisis. As one Palestinian elder in Gaza told us:



'If this is humanity, then the word has lost its meaning.'

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