THE COST OF REPRESSION | SECRET GOVERNMENT FUNDS & HUMAN RIGHTS ABUSE IN THE GULF
INQUIRY REPORT INTO THE INTEGRATED ACTIVITY FUND AND THE GULF STRATEGY FUND
APPG ON DEMOCRACY AND HUMAN RIGHTS IN THE GULF
JULY 2021

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ABOUT THE APPG

The All-Party Parliamentary Group (APPG) on Democracy and Human Rights in the Gulf is a cross-party parliamentary group of 17 members, of which 12 are office holders, whose purpose is ‘to promote and protect democracy and human rights in Gulf countries’. The APPG, which has been in existence since 2016, has been scrutinising UK-funding to Gulf countries through the Integrated Activity Fund since 2017. The APPG is Chaired by Brendan O’Hara MP, Scottish National Party (SNP) Spokesperson for International Human Rights and Conflict Resolution, and the Bahrain Institute for Rights and Democracy (BIRD) acts as the Secretariat.

Membership of the APPG

Chair - Brendan O’Hara MP, Scottish National Party
Vice Chair - Sir Peter Bottomley MP, Conservative
Vice Chair - Alistair Carmichael MP, Liberal Democrat
Vice Chair - Andrew Gwynne MP, Labour
Vice Chair - Chris Law MP, Scottish National Party
Vice Chair - David Linden MP, Scottish National Party
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Member - Layla Moran, Liberal Democrat
Member - Baroness Bennett of Manor Castle, Green Party
Member - Caroline Lucas MP, Green Party
Member - Alan Brown MP, Scottish National Party
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APPG – All-Party Parliamentary Group
BIRD - Bahrain Institute for Rights and Democracy
CSSF - Conflict, Security and Stability Fund
DFID – Department for International Development
DIT – Department for International Trade
FAC - Foreign Affairs Committee
FCDO - United Kingdom Foreign, Commonwealth and Development Office
FCO - United Kingdom Foreign and Commonwealth Office
FOIA – Freedom of Information Act
FY - Financial Year
GBF - Global Britain Fund
GCC - Gulf Cooperation Council
GSF - Gulf Strategy Fund
IAF - Gulf Strategy Integrated Activity Fund
ICAI - Independent Commission on Aid Impact
ICU - Intensive Care Unit
JCNSS - Joint Committee on the National Security Strategy
MENA - Middle East and North Africa
MoI – Ministry of Interior
NIHR - Bahrain’s National Institute for Human Rights
NSC - National Security Council
ODA - Overseas Development Assistance
OPP - Bahrain’s Office of Public Prosecution
OSJA – Overseas Security and Justice Assistance
SDSR - Strategic Defence and Security Review
SIU - Bahrain’s Special Investigations Unit
SNP - Scottish National Party
UAE – United Arab Emirates
UN - United Nations
WGAD - United Nations Working Group on Arbitrary Detention
In 2011, calls for democracy, justice and the respect for human rights erupted across the Middle East. The historical movement that followed shook nations to their core and ignited the hopes of millions across the world. Yet, a decade on, the struggle for democracy and a fairer society is far from over for the people of the Arab Gulf.

In the wake of the Arab Spring, the United Kingdom (UK) began providing funding to the Gulf monarchies. Despite almost ten years of British taxpayer-funded assistance to these wealthy regimes, their human rights records have largely deteriorated. Gulf populations continue to suffer some of the most brutal oppression in the world, often in flagrant violation of international law.

Arbitrary executions, systemic use of torture, enforced disappearances, mass imprisonment of political dissidents and routine harassment of civil societies have plagued countries such as Bahrain and Saudi Arabia, whilst Yemen continues to suffer the world’s worst humanitarian crisis six years after the Saudi-led military coalition invaded the country. Yet despite their manifold abuses, Gulf Cooperation Council (GCC) states continue to receive millions of pounds from the British taxpayer every year.

As parliamentarians, we have seldom encountered so much government resistance as when we began investigating the source of this funding: the secretive Integrated Activity Fund (IAF) and the Gulf Strategy Fund (GSF). The Gulf-specific IAF was founded in 2016 and replaced by the GSF in 2020. Showers of requests for information on the IAF, torrents of credible human rights concerns connected to the funds and repeated calls for their suspension from within Westminster and beyond have been steadily ignored by successive governments since at least 2015.

Indeed, IAF-funded programmes have been run with absolute minimal levels of accountability, transparency and due diligence in spite of being repeatedly implicated in human rights violations. When the secrecy of the IAF was challenged, the government simply transferred funds to the GSF. Despite countless warnings and mounting evidence from human rights watchdogs, notably the Bahrain Institute for Rights and Democracy, and years of repeated cross-party representations, efforts to compel government action have been routinely stonewalled. Attempts to scrutinise these funds are met with hostility and the government has been deliberately secretive to the extreme about the way this money is being spent. Ministers routinely ignore or evade
questions, and pledges of improved transparency have transpired to be tokenistic.

While the UK government prevaricates, we have witnessed the heartbreaking human suffering inflicted by the funds’ beneficiary states. Having met personally with victims such as Ahmed Ramadhan, the 11-year-old son of a Bahraini death row inmate, it is appalling to see efforts to put an end to violations obstructed by the UK government time and again. Ahmed’s father, Mohammed Ramadhan, was tortured, sexually assaulted and had his death sentence upheld after IAF-funded oversight bodies whitewashed his allegations of abuse. Mohammed could now be executed at any moment with little warning given to his wife and three children, despite the United Nations calling for his immediate release and compensation.

With the government seemingly prepared to go to considerable lengths to avoid revealing its activities in the Gulf, the All-Party Parliamentary Group on Democracy and Human Rights in the Gulf commissioned this report in order to compile known information about the IAF and the GSF, highlight extremely serious ongoing concerns, make recommendations to address the funds’ implications in human rights abuse and urgently refer the matter to Select Committees for further inquiries. The government’s inaction is no longer tenable and it is high time that the UK suspends its provision of harmful assistance to GCC countries through the GSF.

Brendan O’Hara MP
APPG Chair

Lord Scriven
APPG Vice Chair
KEY FINDINGS

1. The IAF and the GSF have failed to prevent a severe deterioration in the human rights situation in the GCC: Human rights in beneficiary countries have worsened since IAF-funded programmes began in 2017. Bahrain ended a moratorium on the death penalty and executions have increased over ten-fold in Bahrain since 2017. Executions have also risen in Saudi Arabia, which executed a record 184 people in 2019. States have violently cracked down on civil societies whilst freedom of expression, opinion and assembly have been increasingly curtailed. Peaceful dissidents, including human rights defenders, continue to face persecution.

2. IAF-backed institutions in Bahrain and Saudi Arabia have whitewashed human rights abuses, placing the UK government at risk of complicity in abuses themselves: The IAF has funded training to internationally discredited Bahraini oversight bodies which have repeatedly whitewashed torture allegations. Due to the lack of transparency surrounding the IAF, it is not possible to conclusively confirm whether or not its taxpayer-funded government programmes are directly complicit in abuses.

3. The transparency of the IAF and the GSF is wholly inadequate: What little information has been released on the IAF and GSF was disclosed only as a result of extensive scrutiny and investigation by rights groups and parliamentarians. The government has been highly secretive and adversarial when dealing with scrutiny towards the funds. FOI requests are routinely subject to blanket exemptions whilst responses to written parliamentary questions that are not refused are frequently incomplete or contain insufficient information. Despite a promise to improve the transparency of the fund, the publication of a GSF programme summary in March 2021 was inadequate and failed to provide information repeatedly requested by elected representatives.

4. The IAF and GSF lack accountability: Negligible levels of transparency, flawed human rights due diligence and a near-absence of Ministerial oversight on projects with human rights implications has meant that the IAF and the GSF have poor levels of political accountability.

5. The UK government has been misleading and deceptive about the IAF and the GSF: Government claims that much information on the IAF cannot be disclosed since most programmes are delivered regionally, are false. Similarly, the government’s representation of the IAF as a fund for health, sport and culture, as well as its claim that the IAF does not fund bodies dealing with security matters in Bahrain, are misleading to the point of deception.

6. IAF and GSF’s OSJA human rights due diligence is flawed, improperly applied and entirely absent in some cases: The OSJA process lacks Ministerial oversight and political accountability and failed to be applied to at least one IAF-funded activity with security and justice implications, leaving this activity without any human rights due diligence. Consequently, IAF programmes do not comply with the UK’s domestic and international obligations in every case. Due to the lack of transparency, it is not possible to know on how many occasions the government failed to conduct an OSJA where it was required.
7. The IAF and the GSF fund programmes to bodies in Bahrain and Saudi Arabia that continue to be implicated in serious human rights and international law violations, years after they began benefitting from UK-funded training: a) Bahraini beneficiaries of both funds, including the aforementioned oversight bodies and the Ministry of Interior, have whitewashed torture allegations reported by death row inmates, whitewashed the torture allegations of children and conducted inadequate investigations into allegations of abuse. b) IAF beneficiaries in Saudi Arabia have been implicated in war crimes in Yemen. Specifically, the Royal Saudi Air Forces have been accused of perpetrating war crimes against civilians in Yemen, while the Joint Incident Assessment Team have been accused of conducting inadequate investigations into war crimes.

8. The UK government has repeatedly ignored evidence that IAF and GSF beneficiaries are implicated in human rights abuses: The government has so far failed to acknowledge mounting credible concerns, supported by considerable evidence, implicating IAF and GSF beneficiaries in human rights abuse. Instead, the government responds defensively to concerns and continues to heap problematic praise onto GCC states which risks further emboldening perpetrators. The government regularly accepts flawed and inaccurate assurances from GCC authorities above evidence presented from the international community.
RECOMMENDATIONS AND REFERRALS

Recommendations to the Government

The APPG is deeply concerned by the findings of this report which indicate that the IAF - now renamed the GSF - is implicated in human rights violations in the Gulf. Findings show that programmes under the fund are: ineffective in achieving their objectives; uphold institutions that facilitate and perpetrate violations including torture, arbitrary application of the death penalty and illegal drone strikes; and, that there is unprecedented government secrecy surrounding these public funds, which has at times amounted to deception, and which undermines the principles of a democratic nation.

The APPG therefore makes the following recommendations to the government:

• Government funding to GCC states through the GSF should be immediately suspended pending an independent inquiry into its implication in human rights and international law violations. This is with particular regards to human rights violations in Bahrain and war crimes perpetrated by Saudi Arabia in Yemen.

• The government’s OSJA process is the only apparent form of due diligence to which IAF and GSF programmes are subject and has proven an inadequate means of assessing human rights risks. Fundamentally, the government should accept that Ministers cannot legally authorise any assistance carrying a real risk of contributing to torture or the death penalty.

• The government should commit to an independent review of the OSJA policy, and take steps to replace it with a regime of binding statutory safeguards in order to prevent UK complicity in torture and the death penalty.

• The government should commit to publishing all assistance to countries on the FCDO’s human rights watch list, as well as all GCC countries, along with all OSJAs assessments for such programmes, with appropriate redactions where necessary to avoid serious harm to national security.

• The government should implement the Foreign Affairs Committee’s (FAC) recommendations made in its 2018 report Global Britain: Human Rights and the Rule of Law, namely that the UK Foreign Office should:
  • Be clearer about how funding is allocated and what it achieves;
  • Outline clear mechanisms for measuring progress in its rule of law and democracy programmes;
  • Review the current situation in Bahrain and report its findings to the FAC to further consider whether funding should continue to this country; and
  • Respond firmly to countries that fail to make sufficient progress in the areas of rule of law and democracy in order to underline the importance of international standards and rules on human rights. States that fail to make progress, or that regress, should be subject to repercussions, including the suspension of support.
Given the failure of the OSJA process to adequately assess the human rights implications of taxpayer-funded projects in the GCC, the government should publish IAF and GSF programme details to allow these implications to be independently assessed. Publication would help to address serious ongoing human rights concerns and would demonstrate the level of effectiveness of IAF and the GSF programmes. Publication would also improve the transparency of the funding and increase public confidence in government policy. The following information on the IAF and GSF should be made public immediately:

- Actual spending broken down by (a) country (b) financial year and (c) individual programme;
- All programme titles;
- The names of programme beneficiaries and the value of the assistance they received, broken down by (a) financial year and (b) programme title;
- The names of programme implementers and the value of the assistance they received, broken down by (a) financial year and (b) programme title;
- A programme-based breakdown of dates and locations of activities; and
- All evaluations and assessments of programme activities.

**Referrals to Select Committees for further inquiry**

In light of the findings of this report, the APPG makes referrals to the following governmental committees for their inquiry into the implications of the IAF and GSF in human rights violations in the Gulf:

1. The House of Commons Foreign Affairs Select Committee;
2. The House of Commons Home Affairs Select Committee;
3. The House of Commons Defence Select Committee; and
4. The House of Lords International Relations and Defence Select Committee.
BACKGROUND

Background of UK funding streams to the Gulf

Since 2012, government funding to GCC countries has moved between at least four different funds. From the 2011/12 to the 2014/15 financial year (FY), the Foreign and Commonwealth Office (FCO) provided funding to Gulf countries through the Arab Partnership Participation Fund (APPF); a £42.8m fund which was set up in the wake of the Arab Spring as part of the ‘Arab Partnership Initiative’ and ran under the Department for International Development (DFID) and the FCO. Through this fund, over £2.8m was spent on delivering projects “that support political participation; freedom of expression and public voice; and good governance” in Bahrain, Kuwait and Oman. The Conflict Pool, a fund that was transferred to the Conflict, Security and Stability Fund (CSSF) in the 2015/16 FY, has also been used to fund security and justice projects delivered to Bahrain. Indeed, the 2014 training of the Bahraini Chief of Police, Tariq Al Hassan, was paid for by the UK taxpayer through the Conflict Pool.

The controversial conflict, security and stability fund, the CSSF [...] drew criticism from UK aid watchdogs for serious shortcomings in the way it operated. It was found to have been insufficiently rigorous in applying safeguards to prevent collaboration with foreign entities with suspect human rights records [...] once the programme began to face scrutiny, it was simply transferred over to the Integrated Activity Fund.

David Linden MP

Timeline of UK funding streams to the Gulf

2011: The Arab Spring hit GCC countries including, Bahrain, Saudi Arabia and Oman

2012: Arab Partnership Participation Fund (APPF) is established

2015: APPG closes
- Conflict, Security and Stability Fund (CSSF) is established
- Conflict Pool is transferred to the CSSF
- Gulf Integrated Activity Fund (IAF) is introduced
- IAF is endorsed by the National Security Council
- UK’s Gulf Strategy is announced

2016: IAF comes into use
The UK’s Gulf Strategy

The UK’s Gulf Strategy was announced in November 2015 in the National Security Strategy and Strategic Defence and Security Review. It was endorsed by the National Security Council (NSC) in July that same year. The objectives of the Gulf Strategy are to strengthen, deepen and broaden the UK’s engagement with the six GCC states in order to increase regional stability, mutual security and prosperity, and to protect and promote UK interests. The review stated that “in particular, we will build a permanent and more substantial UK military presence to reflect our historic relationships” and went on to discuss HMS Jufair at the Mina Salman port in Bahrain as well as the intention to establish a British Defence Staff in the region.

The strategy promises sustained and regular Ministerial engagement and claims to be underpinned by “cooperation in areas ranging from rule of law to education, healthcare and infrastructure”. In the same year as this strategy was announced, both the CSSF and the Gulf Strategy Integrated Activity Fund (IAF) were introduced.

Conflict, Security and Stability Fund

Launched in 2015, the CSSF is a £1.26bn annual fund operating in 84 countries. Through the CSSF, around £5m has been spent on the UK’s technical assistance programme in Bahrain alone. Indeed, £1.52m was spent on this programme through the CSSF in the 2016/17 FY, in order to “encourage progress on human rights in areas which included focusing on building effective and accountable institutions, strengthening the rule of law and justice reform”.

In 2017, parliament’s Joint Committee on the National Security Strategy (JCNSS) warned that the CSSF risked becoming a “slush fund” and that its operations and achievements were opaque, whilst it “lacks political leadership and accountability”. The JCNSS also criticised the NSC for “marking its own homework”, due to its dual-role in both operating and reviewing the CSSF, and the JCNSS con-

**2015:** APPG closes
- Conflict, Security and Stability Fund (CSSF) is established
- Conflict Pool is transferred to the CSSF
- Gulf Integrated Activity Fund (IAF) is introduced
- IAF is endorsed by the National Security Council
- UK’s Gulf Strategy is announced

**2017:** Existence of the IAF is revealed

**2018:** IAF is transferred from the Cabinet Office to the Foreign and Commonwealth Office

**2020:** IAF closes and is replaced by the Gulf Strategy Fund (GSF) in April

**2022:** GSF is funded until April this year, with future allocations to be determined in the forthcoming Spending Review.
The crux of the issue [...] is to do with secrecy. There have been few statements about the fund. Initially, there was no admission of the fund at all. It was like the security services used to be - it did not exist.

Andy Slaughter MP

Examples of CSSF-funded activities in the GCC include the training of a delegation of Bahraini police officers in Belfast, Northern Ireland, in 2015. This community policing and protest management training cost the taxpayer £16,000 and included sessions on the use of water cannons, dogs and intelligence gathering methods. It was denounced by rights groups, who stated that “elements of Bahrain’s security apparatus trained by the UK committed appalling human rights violations against [...] five death row inmates, and did so while or after receiving British training”.

Furthermore, in 2017, it emerged that £25,000 of public money was spent under the CSSF to send the Royal Marines band to Manama, Bahrain, to play at the Queen’s 91st birthday celebrations. In the face of mounting scrutiny and criticism, the CSSF responded to many of the ICAI recommendations in May 2018. However, by that point money earmarked for Gulf countries had already been reassigned to the newly created - and even less transparent - IAF.

The Gulf Strategy Integrated Activity Fund

The IAF was a public fund reserved for the six GCC states. Introduced in the 2015 spending round as part of the UK’s Gulf Strategy, the UAF did not come into use until the 2016/17 FY. The IAF was non-ODA and had an allocated annual budget of over £20 million to invest in the GCC until the end of the Strategic Defence and Security Review, amounting to a £80m budget until 2020. The actual spend for the IAF between the 2016/17 and 2019/20 FY was £53.4 million. The IAF was originally based in the Cabinet Office, but was later transferred to the FCO (now the Foreign, Commonwealth and Development Office - FCDO) at the start of the 2018/19 FY. The IAF was designed as a means for the government to fund activities exclusively in the six GCC states. An unknown amount of funding for the IAF came through the CSSF and the Prosperity Fund.

The government has strongly resisted providing any information about the fund or its beneficiaries. Although the IAF was introduced in the 2015/16 FY, its very existence was not revealed until December 2017, following a written parliamentary question to the then-Minister for the Middle East and North Africa (MENA), Alistair Burt. The Global Britain Fund (GBF) is the FCO’s departmental policy programme budget and has funded some of the same security and justice projects as the IAF.
Governance of the IAF

In 2020, limited details about the governance of the IAF were revealed in response to an FOI request. The Gulf Strategy Group (IAF) was responsible for the governance, oversight and operation of the IAF and for ensuring that IAF funded programmes contributed to the delivery of the Gulf Strategy. It was accountable to the Gulf Strategy Group (GSG) which is chaired by the FCDO Director MENAD. The GSG (IAF) met bi-monthly and prepared quarterly reports covering programme performance, finances and risk.

The GSG (IAF) was chaired by the Head of the FCO’s Arabian Peninsula Joint Unit. Voting members of the group included a representative from each GCC post, and government departments delivering the Gulf strategy including DFID and NSS. Representatives from the Stabilisation Unit, the IAF team and FCDO MSPT also attended meetings.

The GSG (IAF) had the authority to approve projects of up to £1m and to vire up to £250,000 between projects. Projects over £1m had to be referred to the GSG with a recommendation on whether or not to approve those projects. Each IAF activity required a lead department and a Senior Responsible Officer.

The Gulf Strategy Fund

The GSF replaced the IAF on 1 April 2020. It is a non-ODA fund which is managed as part of the FCDO’s International Programme. The GSF initially had a budget of £20 million in 2020/21, which was reduced to £8.4 million following a spending review in light of the Covid-19 pandemic. Programme teams in each of the GCC countries were assigned to oversee nine GSF programmes in Bahrain, four in Kuwait, nine in Oman, two in Qatar, six in Saudi Arabia and seven in the United Arab Emirates (UAE) in the 2020/21 FY.

At the end of an October 2020 House of Commons Backbench Business Debate on the ‘Transparency of the IAF’ and following significant scrutiny on the fund’s transparency, MENA Minister James Cleverly, promised that a programme summary of the GSF would be published. On 31 March 2021, the government published this programme summary which provided very limited detail of GSF activities and made no mention of human rights or due diligence.

The summary did confirm that GSF projects including “security and justice” are funded in Saudi Arabia whilst “police reform” and “capacity building of Bahrain’s oversight

### IAF Spending

<table>
<thead>
<tr>
<th>Financial Year</th>
<th>Allocated Budget (£)</th>
<th>Actual Spending (£)</th>
</tr>
</thead>
<tbody>
<tr>
<td>2016/17</td>
<td>20 M 40</td>
<td>10.5 M 41</td>
</tr>
<tr>
<td>2017/18</td>
<td>20 M 42</td>
<td>13.9 M 43</td>
</tr>
<tr>
<td>2018/19</td>
<td>20 M 44</td>
<td>17.08 M 45</td>
</tr>
<tr>
<td>2019/20</td>
<td>20 M 46</td>
<td>12.4 M 47</td>
</tr>
<tr>
<td>2020/21 (GSF)</td>
<td>8.4 M (formerly 20 M)</td>
<td>-</td>
</tr>
<tr>
<td>2021/22 (GSF)</td>
<td>10 M 49</td>
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Table 1: IAF and GSF Spending showing allocated budget and actual spending for FYs 2016/17 to 2021/22
bodies” are funded by the GSF in Bahrain. In the UAE, the GSF funds work addressing “mutual threats of concern” including cybercrime and terrorism whilst in Oman projects include a “Public and Order Public Safety Training” project, which was delivered in Oman from December 2020 to March 2021. In June 2020, the summary was updated to show that some GSF funds have been earmarked to establish a regional “cyber ambassador” to provide “opportunities for UK companies to export cyber security products and services”, which raises some concern in light of past UK sales of spyware which might have been used for internal repression in countries including Saudi Arabia, Bahrain and the UAE.

Bahrain projects aim to support Bahraini oversight bodies to develop a complaints management system, contribute towards the promotion of evidence-based police investigations and to help develop Bahrain’s thinking and capability around extremist violence.

Table 2: Government Departments that Applied to the IAF and the GSF in FYs 2018/19 to 2020/21

<table>
<thead>
<tr>
<th>Government Departments that Applied to the IAF and GSF</th>
<th>FY 2018/19 (IAF)</th>
<th>FY 2018/19 (IAF)</th>
<th>FY 2020/21 (GSF)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Department for Business, Energy and Industrial Strategy</td>
<td>Yes</td>
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</tr>
<tr>
<td>Department for Culture, Media and Sport</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Ministry of Defence</td>
<td>Yes</td>
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<tr>
<td>Cabinet Office</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
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<tr>
<td>Department of Environment, Food and Rural Affairs</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
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<tr>
<td>Crown Prosecution Service</td>
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<td>Yes</td>
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<tr>
<td>Department of International Trade</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
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<td>Her Majesty’s Revenue and Customs</td>
<td>Yes</td>
<td>Yes</td>
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<td>Home Office</td>
<td>Yes</td>
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<tr>
<td>Department of Health</td>
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<td>Yes</td>
<td>--</td>
</tr>
<tr>
<td>Foreign, Commonwealth &amp; Development Office</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
</tbody>
</table>
ISSUES OF TRANSPARENCY

Information on the IAF obtained both by parliamentarians and through FOI requests has been piecemeal, with the government frequently relying on blanket exemptions to justify withholding information. The transparency of the IAF notably regressed in comparison with the CSSF, details of which were disclosed through FOI requests without the application of blanket exemptions.

The government has consistently professed the benign nature of the IAF, stating that the activities it funds “include, but are not limited to, activities focusing on aquaculture, sport and culture, healthcare and institutional capacity building”. These activities alone would not merit the degree of secrecy with which the IAF is treated by the government. The replacement of the IAF by the GSF reflects a pattern whereby the government moves money between funding streams to the Gulf to avoid unwanted scrutiny; with the IAF now no longer in use it remains to be seen whether the government will ever disclose how and where this public money was spent over the course of its four-year existence.

The government’s response to years of parliamentary demands for greater transparency surrounding these funding streams was to quietly publish a short bullet point structure programme summary of the GSF which provided very limited details of the fund’s activities. Although the government made this publication as a response to calls for improved transparency, new information provided on GSF programmes was minimal. Indeed, if anything the publication highlighted the government’s ongoing failure to effectively improve the transparency of its funding.

Government admits lack of transparency and accountability

This report can reveal that in August 2019, the Governance Board of the IAF identified the need to “rebrand” the fund and reported that a “root and branch overhaul” of the IAF was needed. A key area for improvement was to strengthen the “transparency, accountability and governance of the fund”. They also stated that the government needed to “own the narrative on the fund in [the] future”. Following this identification of a need for rebranding the IAF, it was replaced by the Gulf Strategy Fund (GSF) on 1 April 2020.

This shows that although the government’s own internal evaluations found the fund to be lacking transparency and accountability, no discernible improvements were made in
these areas. Indeed the IAF proceeded to be transferred to the GSF, seemingly as part of the aforementioned “overhaul”. However since the GSF’s establishment, there has not been any information to suggest that it has greater levels of transparency, accountability or indeed effectiveness than its predecessor. The government’s own admittance that the IAF was flawed demonstrates the urgent need for both funds to be halted until their levels of transparency and accountability can be significantly improved and their implication in rights abuses can be independently assessed.

**Government refusal to disclose spending breakdowns**

The government has repeatedly refused to disclose country-specific breakdowns of how the IAF was spent in each of the six GCC countries covered by the fund. By way of explanation, the government claims that “many of the [IAF] projects and programme activities were delivered regionally, so it is not possible to provide a breakdown by beneficiary state”.\(^{60}\)

In direct contradiction to this claim, however, this report can reveal that at least two thirds of IAF programmes are country-specific and only a minority of programmes are delivered regionally. In the 2018/19 FY, 66% of IAF programmes were country-specific and in the 2019/20 FY this rose to 70%.\(^{61}\) In both years, IAF programmes were delivered to Bahrain, Kuwait, Oman, Saudi Arabia and the UAE respectively, with the addition of Qatar in the 2019/20 FY. This finding is complemented by two responses to FOI requests which detail two programmes delivered exclusively in Bahrain, and a third FOI response revealed that each GCC state undergoes country-specific monitoring and evaluation under the IAF.\(^{62}\)

It thus appears that the FCDO has issued deliberately misleading responses to many requests, both for information and for improved transparency, regarding the IAF.

**Blanket exemptions to information disclosure**

The government has consistently refused to release information about activities funded by the IAF, despite repeated requests by MPs, peers and rights groups. The government has used a number of different excuses to justify withholding even basic information on the IAF, among the most prominent of which are blanket exemptions on grounds of national security and/or international relations.

> It is simply outrageous that the Government continue to use national security or other measures to disguise the use of money that they say is for entirely benign purposes.

**Andy Slaughter MP\(^{65}\)**

**National security exemptions**

The government has justified withholding information based on the blanket exemption of the Freedom of Information Act (FOIA) regarding matters pertaining to national...
security (Section 23). However, with regards to Bahrain the government has explicitly stated that the IAF “is not being used to fund or sponsor Bahraini bodies dealing with security matters,” raising questions about the applicability of the exemption.\(^\text{66}\)

Whilst this claim may be technically true, it is an incomplete and misleading response, since the IAF has funded bodies which in turn provide direct assistance or training to Bahraini security bodies. When detailing the activities funded by the IAF, the government has referred to “activities focusing on aquaculture, sport and culture, healthcare and institutional capacity building,” projects which lack any ostensible security dimension.\(^\text{67}\) Nonetheless, information continues to be withheld on national security grounds.

**Claims that the government does not fund bodies dealing with security matters in Bahrain, alongside the presentation of the IAF as a fund for health, sport and culture, are deceptive.** Written parliamentary questions tabled by APPG members reveal that about one third of IAF projects were related to security and justice (30% of projects in the 2018/19 FY and 34% in the 2019/20 FY) whilst the GSF continues to fund “police reform” in the country.\(^\text{68}\)

Equally, whilst funding has not been directly provided to Bahrain’s MoI to support security programmes, funding has been provided under the IAF to the UK’s College of Policing for them to, in turn, provide training to the Special Investigations Unit (SIU), a quasi-governmental Bahraini human rights oversight body which operates under the auspices of the Office of Public Prosecution (OPP) on matters relating to security.

Both the SIU and the OPP have been widely criticised for whitewashing human rights violations, with the UN Committee Against Torture stating that: “[…] the Committee is concerned that those bodies are not independent, that their mandates are unclear and overlap, and that they are not effective given that complaints ultimately pass through the Ministry of the Interior. It is also concerned that their activities have had little or no effect”.\(^\text{69}\)

**International relations exemptions**

The government has repeatedly justified withholding information based on the (Section 27) blanket exemption of the FOIA regarding matters pertaining to relations with foreign states. It is unclear, however, how releasing information about projects related to “aquaculture, sport and culture, healthcare and institutional capacity building” would threaten international relations with any of the GCC states who received funding under the IAF.\(^\text{70}\)

As well as making blanket refusals of FOI requests made by members of the public, the government has regularly refused to disclose information on the IAF to parliament. Written parliamentary questions are often not answered in order “to maintain the confidence and confidentiality” of, and “protect [the] security” and commercial interests of, their Gulf partners, or since “disclosure would or would be likely to prejudice relations between the United Kingdom and another state”.\(^\text{71}\) The Home Affairs Select Committee has stated that “the Foreign Office should not hide behind any relationship with foreign governments under the guise of ‘commercial sensitivity’”.\(^\text{72}\)

In November 2020, the Department for International Trade (DIT) stated that it is government policy to not disclose specific information related to individual IAF projects for the above reasons. Indeed, the answer
“[w]e do not disclose information related to individual Integrated Activity Fund projects to maintain the confidence and confidentiality of our Gulf partners” was given at least 16 times to written parliamentary questions on the IAF in 2020 alone, including in response to questions with requests as benign as asking for the number of IAF projects applied for by government departments, the titles of IAF projects, the number of projects subject to an assessment through OSJA and the number of projects delivered in a particular country.

Failure to implement Foreign Affairs Committee recommendations

In its 2018 report entitled Global Britain: Human Rights and the Law of Rule, the FAC made clear recommendations to the government on how it should improve transparency of its funding to the Gulf, particularly to Bahrain. In spite of clear recommendations made by the FAC, transparency of UK funding to Bahrain has not improved and technical support continues. Indeed, the report concluded that “the FCO should be clearer about how all such funding is allocated and used and what it achieves, and should inform us in its response to this report how it plans to increase transparency in this respect”. The FAC also called for increased and clearer guidance, stating: “the FCO should create a measured and graduated set of responses to human rights catastrophes. The FCO should review the current situation in Bahrain and Myanmar/Burma and report its findings to us to further consider whether funding should continue to either country”. The report went on to recommend that:

“the FCO should outline clear mechanisms for measuring progress in its rule of law and democracy programmes [...] the FCO should respond firmly to countries that fail to make sufficient progress in these areas in order to underline the importance of international standards and rules on human rights. States that fail to make progress, or that regress, should be subject to repercussions, including the suspension of support”.

These recommendations were never implemented.

HUMAN RIGHTS CONCERNS

Failures of Human Rights Due Diligence

Lack of Ministerial consultation

This report can reveal that as little as 2% of IAF programmes were subject to Ministerial approval. Only one IAF project underwent Ministerial consultation in the 2018/19 FY and only one in the 2019/20 FY, with the Home Secretary and the Foreign Secretary consulted on both occasions. This very low rate of Ministerial consultation compounds concerns about the inadequacy of the IAF’s due diligence, particularly given the high rate of security and justice programmes supported by the fund, which amount to around one third. Indeed, in 2019 the Governance Board of the IAF noted “a lack of awareness amongst Ministers of the IAF”. Despite a large proportion of IAF activities carrying potential human rights risks, Ministerial oversight is negligible, further reducing the political accountability of the fund’s spending.
The secrecy and lack of transparency that surround this fund make a mockery of the Government’s claim to be pursuing an ethical foreign policy. An ethical foreign policy does not fund states that are complicit in human rights abuses, and then seek to deny elected representatives the right to scrutinise that. How can it be remotely ethical to give money to regimes that are accused by many highly-respected international human rights organisations of routinely using torture and executing political dissidents? How can it be remotely ethical for a Government to do everything they can to prevent democratic scrutiny and avoid public accountability for what has been done in our name?

Brendan O’Hara MP

Overseas Justice and Security Assistance

The government has consistently claimed that the IAF is “provided in line with international standards and fully complies with our human rights obligations and the Overseas Security and Justice Assistance process” and “fully complies with [...] the OSJA process”. The OSJA is a mandatory tool for all UK agencies to assess human rights risks when considering delivering assistance to security and justice institutions abroad. An OSJA assessment should assess the overall human rights situation in the country concerned, whether UK support in any way increases the risk of a human rights violation and whether mitigating actions are available. It has been widely criticised, including by the Home Affairs Select Committee who stated that “we question whether the Overseas Security and Justice Assistance guidance is fit for purpose”.

An FOI request revealed that no OSJA was conducted on the visits of delegations of Bahraini officials to the UK under the IAF in 2018. This included both officials from Bahrain’s MoI and judges from Bahrain’s Court of First Instance. Given that judges from this court have contributed to a 600% rise in death sentences in the country since 2011, the failure to conduct an OSJA for these visits raises concerns that judges responsible for issuing death sentences may have benefited from IAF-funded training.

When asked about the lack of OSJA, MENA Minister James Cleverly replied: “The visits to the UK in 2018 and 2019 were arranged for Bahraini officials to meet, observe and ask questions of UK judges and officials about the approach to alternative sentencing by the UK’s courts and National Probation Service. I am satisfied that both visits were consistent with our domestic and international rights and obligations and that OSJA assessments were not required”.

This answer is of serious concern in light of the security and justice focus of the visits and the repeated implications of Bahraini judges and Bahraini MoI officials in human rights violations, including issuing death sentences based solely upon confessions coerced through torture. This raises the concern not only that OSJA is being improperly applied to IAF and GSF activities, but also that an unknown number of IAF and GSF security and justice programmes may not have been subject to an OSJA or any other form of human rights due diligence at all.

Considering the accusations from human rights groups over the legitimacy of this fund, the Government should be obliged to publish the results of the risk assessment that they should obviously have undertaken.

David Linden MP

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Case Study: The death penalty and political prisoners in Bahrain

Since 2012, the UK has been providing Bahrain with ‘technical assistance’, aimed at supporting “progress on building effective and accountable institutions, strengthening the rule of law, and justice reform”. The Bahrain-specific programme was established after the violent suppression of Bahrain’s pro-democracy uprising by Bahraini, Saudi and Emirati troops during the 2011 Arab Spring. Since technical assistance was transferred to the IAF, the FCDO no longer discloses beneficiaries of technical assistance in Bahrain. However, beneficiaries of IAF and GSF funding include Bahraini institutions implicated in serious human rights abuses, such as the torture and sentencing to death of political prisoners.

Until 2017, the primary beneficiaries of UK taxpayer-funded technical assistance to Bahrain included internationally discredited Bahraini human rights oversight bodies including the SIU, the Ministry of Interior Ombudsman (the Ombudsman) and the National Institute for Human Rights (NIHR).

Death Penalty

Since British assistance to Bahrain began through the IAF, executions in the country have increased over ten-fold. In addition, there has been a 600% rise in death sentences in the last decade, with torture allegations marring five out of the six executions that have taken place since 2017, five of which were labelled as “extrajudicial” or arbitrary by the UN, showing the IAF and GSF have failed to reduce the arbitrary application of the death penalty in the country. There are currently 26 people on death row in Bahrain, 11 of whom allege to have been sentenced based upon confessions extracted under torture.

In 2018 and 2019, visits were made under the IAF from the UK College of Policing, Independent Office for Police Conduct and Merseyside Police Professional Standards Department to meet counterparts at Bahrain’s SIU. Bahraini SIU representatives made similar visits to the UK. Costs incurred included an SIU Investigators Workshop in Bahrain to build investigatory capacity and skills in 2019.

Following this IAF-funded assistance to the SIU, its investigation into the torture allegations of Bahraini death row inmates Mohammed Ramadhan and Husain Moosa was criticised by the International Rehabilitation Council for Torture Victims as “critically flawed” and failing to meet “the minimum professional standards and minimum international legal standards”. In May 2021, the UN Working Group on Arbitrary Detention (WGAD) “reiterate[d] concerns previously raised about the [Special Investigations] unit’s independence and effectiveness” in its decision that rules Mohammed and Husain to be arbitrarily detained in contravention of international law. In spite of such evidence that the SIU investigation served to cover up torture, the FCDO Dessau rushes such investigations.

Why have the Government been unable to come out to condemn the death sentences against torture victims in Bahrain? Why is the receipt of funding from the IAF not contingent on the states seeking it not executing people, including their own dissidents? What is the Minister’s explanation for why two states in particular, Bahrain and Saudi Arabia, which receive millions of pounds of taxpayers’ money, are now executing more people, at a faster rate, than they were before receiving money from the IAF?

Brendan O’Hara MP
the investigation into the torture allegations of the death row inmates Mohamed Ramadan and Hussain Moosa was inconsistent, contradictory and contravenes international standards [... the SIU, which the noble Lord maintains is transparent, is quite the opposite and is implicated now in human rights abuses.

Lord Scriven

IAF-funded programmes provided through the College of Policing are thus implicated in the imposition of death sentences upon torture victims in Bahrain. When commenting upon the College of Policing’s international assistance programmes in 2016, the Home Affairs Select Committee stated that:

“[...] the provision of training on the basis of opaque agreements, sometimes with foreign governments which have been the subject of sustained criticism, threatens the integrity of the very brand of British policing the College is trying to promote. It simply smacks of hypocrisy”.

Nonetheless, the FCDO refuses to make its technical assistance contingent upon a demonstrable improvement in the human rights situation in Bahrain, and it is of serious concern that Ministers continue to praise these bodies whilst refusing to increase transparency so as to substantiate the basis of their support.

In the light of the foregoing, the Working Group renders the following opinion:

The deprivation of liberty of Mohamed Ramadan Isa Ali Husain and Husain Ali Moosa Hassan Mohamed, being in contravention of articles 2, 7, 8, 9, 10, 11 (1), 19, 20 and 21 (1) of the Universal Declaration of Human Rights and articles 2 (1), 2 (3), 9, 14, 19, 21, 22, 25 (a) and 26 of the International Covenant on Civil and Political Rights, is arbitrary and falls within categories I, II, III and V.

The Working Group requests the Government of Bahrain to take the steps necessary to remedy the situation of Mr. Ramadan and Mr. Moosa without delay and bring it into conformity with the relevant international norms, including those set out in the Universal Declaration of Human Rights and the International Covenant on Civil and Political Rights.

The Working Group considers that, taking into account all the circumstances of the case, particularly the risk of harm to the physical and psychological well-being of Mr. Ramadan and Mr. Moosa, the appropriate remedy would be to release both men immediately and accord them an enforceable right to compensation and other reparations, in accordance with international law. In the current context of the COVID-19 pandemic and the threat that it poses in places of detention, the Working Group calls upon the Government to take urgent action to ensure their immediate release.

The Working Group urges the Government to ensure a full and independent investigation of the circumstances surrounding the arbitrary deprivation of liberty of Mr. Ramadan and Mr. Moosa, and to take appropriate measures against those responsible for the violation of their rights.
Political Prisoners

Thousands of people are held as political prisoners in Bahrain’s prisons on charges related solely to their peaceful protest activities. Prison conditions are notoriously poor, with torture, poor sanitation, religious discrimination and widespread medical negligence regularly reported by political prisoners.

In 2018, two IAF-funded visits to the UK from Bahraini judges and Ministry of the Interior representatives took place. The visits focused on Bahrain’s law on alternative sentencing (Law No.18 of 2017). According to the Bahraini Embassy in London, these visits were conducted to discuss “both the scope and implementation of alternative sentences in the UK”. Despite a mass prisoner release to ease severe overcrowding in Bahrain’s prisons following the outbreak of Covid-19, evidence suggests that alternative sentencing legislation has discriminated against political prisoners, including Ali Al Hajee and Hajer Mansoor.

In July 2018, members of Durham Police Constabulary visited Bahrain under the IAF and signed an agreement with the Bahraini MoI to support “wider British aims in the region”. Under this agreement, Durham Police committed to providing training “so that Bahraini officers can better make use of forensics in their investigations”. Equally, GSF projects in Bahrain aim to “contribute towards the Bahraini-led reform programme which includes promoting evidence-based police investigations in line with best international standards”. Despite this assistance, the Bahraini justice system has failed to use forensic evidence appropriately. Political prisoner Hajer Mansoor, along with her son and nephew, was convicted and sentenced to three years’ imprisonment in October 2017 in spite of the fact that forensic investigations produced no evidence connecting them to the alleged crime.

In 2021 Bahraini authorities used forensics to detain four juveniles, three of whom were detained on the basis of one child’s coerced confession and forensic evidence allegedly linking that child to a crime. The children were reported to have been subjected to physical, verbal and psychological abuse whilst in detention, including threats of rape and crucifixion, beatings and pepper spray in a confined area. Despite British training and rather than improving the quality of investigations, forensics have thus been improperly used by Bahrain, including to facilitate human rights abuse and detention of children.

With regards to the mistreatment of Bahraini prisoners in violation of international law, the UK government has been warned since at least 2017 of Bahrain’s use of medical negligence against some of the country’s most high profile political prisoners such as Hassan Mushaima. Mushaima, a 72-year old opposition leader who suffers from multiple chronic health problems, who has had over 25 written parliamentary questions tabled on his case alone.

Despite repeated engagement with IAF-funded oversight bodies, inmates continue to report being denied appointments with specialist doctors and access to requisite medication. In April 2020, 19 rights groups appealed to Bahrain to release imprisoned rights defenders and opposition activists, citing the threat posed by medical negligence and Covid-19. In spite of the repeated international condemnation of these oversight bodies for their complicity in rights violations, including against political prisoners, the FCDO continues to refer individuals to these same bodies.
The practices and conditions in prisons, which are squalid, lead to epidemic-level outbreaks of illness. Prisoners do not get treatment for serious health conditions. Many of these individuals are long-standing human rights campaigners going back decades. They are now quite elderly, but they are locked up. Despite having serious health conditions, they do not receive any health treatment.

Andy Slaughter MP

Indeed, inmates have accused oversight bodies of not only failing to investigate abuses committed by prison guards, but of actively concealing abuse. When political prisoner Hajer Mansoor was assaulted by the Director of Isa Town Female Detention Centre Mariam Al Bardoli in 2018, the NIHR dismissed the allegations. When challenged, the Ombudsman then disclosed confidential information to Bahrain’s Embassy in London who posted it on social media in violation of GDPR.

Furthermore, imprisoned human rights defender Ali Al Hajee alleges that the NIHR failed to investigate an assault against him by prison guards in 2015, even after he provided the organisation with the names of the officers responsible. Since 2018, Al Hajee has been forced to conduct two 75-day hunger strikes in order to secure specialist medical care. Equally, in April 2020, the day after disputing claims made by NIHR president Maria Khoury regarding preventative Covid-19 measures in Bahrain’s Jau Prison, journalist Mahmood Al Jaziri, an inmate at the prison, was put into solitary confinement. Despite their manifold failures, the FCDO continues to direct victims of abuses toward discredited oversight bodies, to accept assurances from Bahrain’s government of human rights compliance and heap praise on these discredited institutions.

**Case Study: Saudi Arabia’s War Crimes in Yemen**

In 2021, written parliamentary questions lodged by APPG members revealed that the IAF and GSF were both used to fund activities in Saudi Arabia related to security and justice, including training and assistance provided to a number of Saudi military bodies. In light of the Saudi-led coalition’s ongoing military campaign in Yemen, which is experiencing the worst humanitarian crisis in the world and one of the worst food crises in the world, the lack of transparency and demonstrable effectiveness of the IAF and the GSF raises concerns of complicity in human rights and humanitarian violations committed in Yemen.

Over £1.7m was spent on delivering programmes through the IAF to Saudi Arabia from the 2016/17 FY to the 2018/19 FY, with £0.5m spent through the GSF in the 2019/20 FY (£2.4m spent in total). Beneficiaries of this “training, advice and assistance” were the Royal Saudi Air Force, Royal Saudi Land Forces, Royal Saudi Naval Forces, Border Guard, Saudi Arabia National Guard, Joint Incident Assessment, Security Forces and Joint Forces Command. The government stated that an objective of these programmes is “to aid Saudi Arabia’s efforts to protect its national security and support the Saudi military’s compliance with international humanitarian law”.

IAF and GSF beneficiary, the Saudi Arabian National Guard, is mandated with the protection of the Saudi royal family amongst other internal security responsibilities. Taxpayer-funded support to a defence force tasked with internal security, then, is irreconcilable with the government’s stated objective of helping the Gulf state comply with humanitarian law beyond its borders.

The Joint Incident Assessment Team, another Saudi beneficiary, has been repeatedly criticised by Human Rights Watch over the
course of its reception of UK assistance for “failing [...] to provide credible, impartial, and transparent investigations into alleged coalition laws-of-war violations”, and for conducting investigations into international humanitarian law violations in Yemen which are not in line with international standards.¹²⁴ UK funding to Saudi Arabia thus supports bodies accused of breaching international law and whitewashing alleged war crimes in Yemen.¹²⁵

In addition, the Royal Saudi Air Forces have been consistently implicated in the perpetration of war crimes in Yemen, including the killing of civilians through drone strikes as part of the Saudi-led military coalition.¹²⁶ Civilian casualties caused by the Saudi-led coalition in Yemen almost doubled between 2017 and 2018, whilst Saudi military forces received IAF-funded assistance, suggesting this funding failed in its aim of helping Saudi Arabia better comply with international humanitarian law.¹²⁷

Indeed, the United Nations has highlighted that the coalition’s killing of thousands of civilians in airstrikes, the torture of detained, the rape of civilians and the use of child soldiers may amount to war crimes.¹²⁸ When asked for further information on IAF and GSF funding to Saudi Arabia, the Ministry of Defence refused to disclose details on specific programmes, stating that the information was likely to “prejudice” the UK’s international relations, making it impossible to ascertain the extent to which these programmes may be implicated in violations of international law in Yemen.¹²⁹

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**UK spent £2.4m to help Saudi Arabia comply with international law**

*Over the last four years, the Gulf state has been accused of bombing and killing Yemeni civilians*

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A model of a Saudi air force Eurofighter Typhoon jet, manufactured by BAE System, at a Riyadh exhibition. Photograph: Bloomberg/Ketty

Britain spent £2.4m over the last four years to help Saudi Arabia’s military comply with international humanitarian law - during which time the Gulf state has been accused of indiscriminately bombing and killing Yemeni civilians.

The figures - obtained via parliamentary questions - are the first time the UK has detailed the amount spent via secretive funds to the kingdom, prompting a campaign group to say British taxpayers were backing the country’s military.
Lack of transparent evaluation mechanisms

When asked about the effectiveness of the IAF, the government has failed to provide any measurable indicators to demonstrate that the IAF or the GSF meet their objectives. Although the government stated in January 2020 that it was “confident of [technical assistance’s] positive impact across a variety of areas including building effective and accountable institutions, strengthening the rule of law, and police and justice reform”, it has failed to provide credible evidence to substantiate claims of the positive impact of IAF programmes. Indeed, available information which is outlined in this report shows that the IAF and the GSF are far from effective.

IAF-funded activities are subject to “evaluation to ensure it continues to deliver in line with objectives”, and FOI requests have revealed that this evaluation consists of country-specific ‘Quarterly Results Reports’. Although these reports were disclosed in one case for Bahrain programmes in the 2019/20 FY under FOIA, much of their content was redacted (see Image ). The IAF’s opaque nature amidst increasing concerns of its complicity in human rights violations makes it impossible to ascertain upon what basis the fund is deemed effective or even safe.

In order to demonstrate the safety and effectiveness of the funds, the government should publicise all IAF and GSF evaluations. This is particularly important in light of mounting demands from parliamentarians and civil society alike for improved transparency and accountability.

Problematic references to ‘success’ in Bahrain

Where the FCDO is able to point towards any ostensible successes of its IAF or GSF programmes, there are almost always concerns surrounding these references. In Bahrain in particular, the FCDO has repeatedly welcomed what it deems to be indicators of progress in the country, despite such supposed signs of progress being marred by denunciations from human rights organisations. Indeed, the government regularly praised Bahrain or welcomed...
perceived areas of progress, without acknowledging or addressing human rights concerns surrounding these same issues.

These problematic references to ‘success’ in Bahrain can be observed in many answers to written parliamentary questions as well as in the FCDO’s annual Human Rights and Democracy Reports. The omission of key human rights concerns linked to IAF and GSF-funded activities provides incomplete and misleading information. Concerns are not only omitted in government reports, but in direct response to questions which raise those same concerns.133

**Oversight bodies**

Bahrain’s human rights oversight bodies, ostensibly independent bodies mandated to investigate human rights abuse, are beneficiaries of the IAF and the GSF although they have been repeatedly denounced by international organisations including the UN, Amnesty International and Human Rights Watch for being “not independent”, “not effective” and for having “little to no effect”.135 Indeed, in 2021 Amnesty International stated that these oversight bodies “remained ineffective in safeguarding human rights and punishing violations”.136

Following a ninety minute debate where APPG members unanimously outlined such concerns, MENA Minister James Cleverly stated: “I know that the ombudsman’s office has, again, been criticised, but it must be recognised that it has investigated more than 5,000 complaints”,137 whilst the FCDO’s 2019 Human Rights and Democracy Report welcomed the fact that “oversight bodies investigated all allegations put to them, and made their findings public where possible, including through the annual Ombudsman report”.138

As outlined above, in 2020 the government welcomed the SIU’s investigation into the death penalty cases of Mohammed Ramadhan and Husain Moosa, despite this investigation having led to the reimposition of both men’s death sentences139 and being criticised by the Bar Human Rights Committee and the International Rehabilitation Council for Torture Victims as “insufficient”, “ineffective under law” and “fail[ing] to meet the minimum professional standards and minimum international legal standards”, including of the Istanbul Protocol.140

The government’s insistence on praising Bahrain’s IAF and GSF-funded oversight bodies and continued referral of victims towards them shows a demonstrable resistance to addressing serious and legitimate criticism of the harm that these programmes cause.

**Bahraini officials’ implication in abuse**

In their 2019 Human Rights and Democracy Report, the government celebrates Bahrain’s prosecution of 90 officials for abuse over the course of the year. However, in 2021 Amnesty International stated that “[i]n Bahrain there is
no known record of a successful prosecution for torture to force a confession in the past four years” whilst Human Rights Watch have observed that “prosecutions have almost exclusively involved low-ranking officers, and even those have resulted in acquittals or disproportionately light sentences”.

In 2021 it was reported that the SIU, IAF and GSF beneficiary, referred an average of 7.7% of total complaints received over the past five years to criminal courts, with most referrals resulting in acquittals or light sentences. Indeed, high-ranking officials implicated in human rights abuses, including torture and sexual assault, remain in their posts, and have continued to benefit from UK taxpayer-funded training under the IAF.

Among them is Brigadier Fawaz Hasan Al Hasan, who received UK-funded training in Northern Ireland in 2015. Subsequently, while Al Hassan was acting Director-General of the Muharraq Security Complex in Bahrain, female Bahraini rights defenders Najah Yusuf and Ebtisam AlSaegh were tortured and sexually assaulted by officers from Bahrain's National Security Agency. He has since become Director of Bahrain’s Royal Academy of Policing, described by prisoners as a notorious ‘torture hub’. His brother, Tariq Al Hassan, is Bahrain’s Chief of Public Security and has also benefited from IAF-funded training. When asked about the “role of Tariq Al-Hassan in human rights violations in Bahrain”, the government failed to directly answer the question or effectively address this concern in its response.

**Alternative sentencing**

Although the FCDO’s repeated welcoming of the use of Bahrain’s alternative sentencing legislation is warranted, the government does so without acknowledging proper context or addressing key concerns. Concerns that the application of the legislation is discriminatory and is repeatedly denied to eligible political prisoners, such as Ali Al Hajee and Hajer Mansoor, have not been acknowledged by the government. Even when asked directly about the risk of alternative sentencing’s discriminatory application, the government not only does not outline any intended representations in response to this concern, but fails to acknowledge its premise.

**Detained children and Ministry of Interior Ombudsman investigation**

In February 2021, thirteen children were detained in Bahrain during the tenth anniversary of the nation’s Arab Spring pro-democracy uprising in 2011. Those detained included a boy of just 11-years-old and Sayed Hasan Ameen, a 16-year old with sickle cell anemia who suffered a kidney infection, a lung infection and reduced heart function at the time of his detention. He had been hospitalized twice for a total of 26 days in October and November 2020, including 7 days in an Intensive Care Unit, just months prior to his arrest. With other children, he was detained in Dry Dock Detention Centre where

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"The problem is not just that these organisations are ineffective, despite the money they receive from the UK, but that they collaborate with the prosecuting authorities. They provide a shield against proper investigation and often turn down investigations on little or no evidence, which puts the individual whose case they are reviewing in a worse position than when they started."

Andy Slaughter MP

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there were confirmed cases of Covid-19, putting his life in danger due to his severe medical condition.\textsuperscript{150}

Reports from BIRD and Human Rights Watch revealed that children’s confessions were coerced under verbal, physical and psychological abuse and under threats of electric shocks, crucifixion, gang rape and the rape of their parents.\textsuperscript{151}

\begin{quote}
If we consider the way in which alternative sentencing policy is pursued in Bahrain, we find very quickly that in fact there is no benefit for the political prisoners there.
\end{quote}

\textbf{Alistair Carmichael MP}\textsuperscript{158}

Bahraini judges and prosecutors were found to have enabled this abuse and to have barred parents and lawyers from attending children’s interrogations and court hearings.\textsuperscript{152} Complaints of abuse related to some of these cases were brought to the Bahraini Ombudsman, an IAF beneficiary, whose investigation dismissed all the allegations and was, according to findings by BIRD and Human Rights Watch, a “blatant effort to whitewash serious human rights violations”.\textsuperscript{153} The UK government then approvingly cited this misleading report by the ombudsman.\textsuperscript{154}

When serious concerns surrounding the detention and abuse of children were raised with the UK government, they failed to acknowledge any of the concerns and instead chose to paint the children as criminals. In a letter to FCDO ministers, Human Rights Watch raised serious concerns that the government had publicly named the children in connection with their alleged crimes and had directed children towards their abusers, putting them at even greater risk of harm. The FCDO also repeated assurances from Bahrain that “access to medical care for those in detention is provided in line with the constitution of Bahrain”, despite credible evidence to the contrary provided by Human Rights Watch and BIRD, which noted that Sayed Hasan Ameen was unable to access vital medication for 8 days whilst in detention.\textsuperscript{155} The letter further highlighted that the FCDO falsely stated that three of the children were “all aged 17” and failed to correct this error; the organisation called upon the government to correct the parliamentary record pertaining to these cases.\textsuperscript{156}

\begin{table}[h]
\centering
\caption{Letter re: UK Response to Abuses against Children by Bahrain Authorities}
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June 7, 2021  
James Cleverly, MP  
Minister for the Middle East and North Africa  
Lord Ahmad of Wimbledon  
Minister of State for Foreign, Commonwealth and Development Affairs  
Human Rights Minister  
\textbf{Re: UK Response to Abuses against Children by Bahrain Authorities}  
Dear Minister Cleverly and Lord Wimbledon,  
We are writing to share information we have documented about children who were detained and abused in Bahrain from November 2020 to March 2021 for alleged crimes related to protests. We also wish to express our concerns about your statements on behalf of the UK government about these cases in response to parliamentary questions.  
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\textbf{UK government statements} about these children’s cases instructed “those with concerns about treatment in detention [to] contact the relevant authorities as well as the appropriate Bahraini human rights oversight body.” We believe that if the Bahraini children in this case were to follow your instructions, they could be at even greater risk of abuse. The UN Committee against Torture has \textbf{raised concerns} that the ombudsman’s office is neither independent nor effective. It and other official bodies have \textbf{repeatedly failed} to investigate credible allegations of prison abuse or to hold Bahraini officials accountable.
Failure to positively impact the human rights situation in the Gulf

Millions of pounds of UK taxpayer money continue to be opaquely funnelled to GCC countries to train bodies implicated in torture, arbitrary executions and other grave human rights violations in some of the world’s most oppressive nations, whilst the FCDO refuses to disclose why, how and where this public money is being spent.

Since the IAF’s establishment, the human rights situation in the Gulf, particularly in Saudi Arabia, Bahrain and the UAE, has severely deteriorated. Since 2017, both Bahrain and Saudi Arabia have seen renewed government crackdowns, with political opposition figures and dissidents jailed and a startling tenfold rise in the use of the death penalty in Bahrain. In 2019, Saudi Arabia executed a record 184 people, including over 100 executions that were crucifixions or beheadings. In 2017, Bahrain abandoned a moratorium on the death penalty and has since executed 6 people, with a further 26 on death row currently at risk of imminent execution.

All Bahraini political opposition parties have been dissolved and their leaders handed lengthy sentences on sedition charges. Unlicensed gatherings of over five people are illegal and Bahraini police invariably suppress public protests with violence. The free press was abolished with the forcible shut down of Bahrain’s only independent newspaper, Al-Wasat, in 2017, while authorities have targeted critical civil society figures for expressing their views online. Despite the FCDO’s public commitment to promoting press freedom, Bahrain is at 168/178 on the World Press Freedom Index 2020, with Saudi Arabia at 170/178, making them some of the most censored and repressed civil societies in the world.

Indeed, in its 2021 World Report, Human Rights Watch stated that throughout 2020, in Saudi Arabia, “authorities continued to repress dissidents [and] human rights activists” and that “capital trials continued against detainees on charges that related to nothing more than peaceful activism and dissent”. The report also declared that “Bahrain escalated repression” in 2020, and underlined that no independent media have been able to operate since 2017.

The UAE continued to unjustly imprison leading human rights activists and peaceful dissents without clear legal basis and Kuwaiti authorities “restrict[ed] free speech and prosecute[d] dissents”, whilst Oman also cracked down on freedom of expression. The report highlighted that all GCC countries apart from Qatar continued to participate in the Saudi-led military campaign in Yemen, carrying out “unlawful airstrikes that have killed and wounded thousands of civilians”, contributing significantly to the disastrous war there and the worst humanitarian crisis on the planet. The APPG Chair wrote to the MENA Minister highlighting the reports’ findings and raising human rights concerns, whilst repeating the call for the record on human rights across the board is getting worse year on year in countries such as Saudi Arabia and Bahrain [...] I ask the Minister, how are our attempts, funded by the British taxpayer, to improve human rights in these countries going? It all seems to be going in the opposite direction.

Andy Slaughter MP

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suspension of funding pending demonstrable improvements in the regions’ human rights situation, but did not receive a response.

Across the Gulf, prominent activists have faced torture and arbitrary imprisonment. Loujain Al-Hathloul, the now-released Saudi women’s rights campaigner was tortured and sexually abused in Saudi custody, and Emirati blogger and dissident Ahmed Mansoor, who remains behind bars at the time of writing, are among thousands of human rights defenders, activists, journalists and dissidents who have been arbitrarily detained across the Gulf. 169

Given the failure of UK assistance through the IAF and the GSF to prevent a steep decline in human rights in the GCC, there are serious questions to be asked about the way public money is being spent by the government in the region. With the government consistently refusing to disclose information about IAF and GSF-funded programmes and ongoing human rights concerns surrounding the funds, it is imperative the GSF be suspended pending an independent investigation to ensure that public money is not contributing to human rights violations in the region.

METHODOLOGY

This report is largely based upon both answers given to written parliamentary questions and responses to FOI requests. Written parliamentary questions were lodged by past and present APPG members as part of the group’s investigatory work into the IAF and GSF, as well as other members of the House of Commons and the House of Lords, whilst FOI requests were submitted by members of the public and representatives from human rights organisations such as BIRD. Government answers to over 100 written parliamentary questions and FOI requests are relied upon in this report.
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