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Principled Compromises or Compromised Principles?

A review of principled humanitarian response in Ukraine

March 2026

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The opinions expressed in this document represent the research team's point of view, and are not necessarily shared by SDC, DRC, or the members of the Steering Committee.

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Contents

List of abbreviations

CSO	Civil Society Organisation
DRC	Danish Refugee Council
EU	European Union
FPV	First-Person View (drones)
GoU	Government of Ukraine
HC	Humanitarian Coordinator
HCT	Humanitarian Country Team
HERE	Humanitarian Exchange and Research Centre
HNRP	Humanitarian Needs and Response Plan
ICRC	International Committee of the Red Cross
IDP	Internally Displaced Person
IHL	International Humanitarian Law
INGO	International Non-Governmental Organisation
INSO	International NGO Safety Organisation
JOP	Joint Operating Principles
NATO	North Atlantic Treaty Organisation
NGCA	Non-Government Controlled Areas
NNGO	National Non-Governmental Organisation
OCHA	Office for the Coordination of Humanitarian Affairs
OHCHR	Office of the UN High Commissioner for Human Rights
OT	Occupied Territories
PFWG	Pooled Funding Working Group
PIN	People In Need
RF	Russian Federation
R2P	Right to Protection
SDC	Swiss Agency for Development and Cooperation
TOT	Temporarily Occupied Territories
UHF	Ukraine Humanitarian Fund
UN	United Nations
UNHCR	United Nations High Commissioner for Refugees
URCS	Ukrainian Red Cross Society
WFP	World Food Programme

Executive summary

This report describes the extent to which the four core principles that underpin humanitarian action have been applied in and are relevant to the ongoing response to people in need in Ukraine. If humanitarians expect armed forces to respect their mandates and mission, they must be clear on their own agendas, intentions, and objectives. However, in Ukraine, the lines between who is humanitarian and who is not have been blurred. This can be partly ascribed to the geo-politics involved. The Russian Federation violated the UN Charter by invading another sovereign state. It has been faced with international sanctions since its annexation of Ukrainian territory in 2014. Since the large-scale invasion in February 2022, a range of countries have supported Ukraine with a large aid package that takes various forms, of which humanitarian aid is only a small part.

Another factor blurring the lines can be attributed to the organisations providing aid. For various reasons, they have refrained (often inadvertently) from establishing a clear distinction between their humanitarian work and other types of assistance. This report lays out those reasons and provides explanations. Essentially, humanitarians can do better in safeguarding their mission and explaining what makes their work humanitarian. The delivery of humanitarian aid in complex environments is by nature a balancing act between often competing priorities, and there is no such thing as a fully principled approach. "Principled compromises" are called for, however, rather than "compromised principles."

Applying the four principles in Ukraine. Arguably, since its very beginnings, the rapidly scaled-up Ukraine response in 2022 was not designed to be principled: it was conceived primarily as an act of partisan solidarity, aimed at supporting the Ukrainian population in its defence against Russian aggression, rather than as a principled humanitarian operation. At times in these early days the pressure to deliver came at the expense of applying humanitarian principles. Yet it is specifically at the start of a new response that principled framing should occur, to create clarity and precision in terms of objectives, agenda, and strategy, and help set priorities.

The humanitarian principles are intended precisely to help navigate highly politicised environments, like Ukraine, to address access restrictions and to guide complex relationships. Clearly, such an approach implicates the role of leadership. Importantly, the key factor in assessing the principles of a response is not necessarily the "what" organisations do (their "work on the ground"), but whether and how agencies have addressed the principles in setting priorities, taking decisions, and managing compromise.

Impartiality and needs in Ukraine. As in other contexts in which the principles have been reviewed, the aspect of non-discrimination, which is one part of impartiality, has been relatively well understood and addressed in this response. The second component of impartiality—proportionality, or prioritising those most in need—has been more complicated to apply. This review identifies three particular challenges to giving priority to particular needs and vulnerabilities: high numbers of elderly people, the war-wounded, and winterisation.

In the early phase of the response, the activation of a so-named "no-regrets" strategy saw rapid coverage and scale prevailing over refined targeting, thereby limiting the ability to prioritise those most in need. Delivering aid without further delay to all those potentially affected by the war reflects clearly the principle of humanity, but blanket distributions of aid should not become the only modality; nor should it be seen as a justification for simultaneously failing to identify and reach the most urgent cases of distress.

Impartiality must be a crucial factor in needs analyses and collective planning and coordination so as to ensure that special needs are well covered. It does not mean, however, that all organisations should respond in the same manner to the same priorities. It is precisely on this aspect that diversity within the humanitarian community can become an asset in terms of complementary approaches. A starting point is that the principles are a function of action.

Humanitarian access. A lack of contacts with the Russian Federation has impacted the ability to work in Russian occupied territories (OT). In situations of armed conflict access negotiations usually take place with the parties to the conflict. In the context of Ukraine, there has been a lack of such negotiations. Access is either discussed as a security matter, takes the form of notifications, or is framed as a matter of assisting populations in OTs. All these aspects have their merit, but what seems to be missing is an overall, strategic effort by those higher up the chain to engage in a humanitarian dialogue that aims at unimpeded humanitarian access with the two parties to the conflict.

The lack of dialogue is not only concerning from a practical perspective, but also from the point of view of principled humanitarian action and international humanitarian law. Furthermore, aside from the issue of whether or not the delivery of impartial humanitarian assistance in OTs should be considered as a feasible option, few key informants seemed to be aware of the relevant rules of IHL.

Neutrality and local actors. The focus on the principle of neutrality in the Ukraine context appears to have come at the expense of taking a broader look at the principles, and it has also detracted from the more operational role neutrality should play, ultimately in support of being able to operationalise humanity and impartiality.

There is a need for a more differentiated approach in understanding who is expected to apply what principles. It should be up to local civil society to determine what approach they want to follow and whether they want to be part of a (traditional) humanitarian response. A frank dialogue is needed rather than a one-size fits all approach.

Procurement practices of INGOs and UN agencies have often made the application of the principles part of their administrative checks in developing contractual arrangements. Due diligence assessments are important, but there should be different approaches to verifying if organisations have the necessary administrative arrangements in place and to what extent they are value-driven and committed to all the humanitarian principles. A procurement and/or administrative approach contradicts the nature of applying the principles, which requires dialogue and engagement rather than a regulatory administrative check or narrow due diligence assessment of compliance.

Distinction from other actors and forms of aid. As the principles help to define the identity and agenda of humanitarian actors, it is important that they are recognised and distinguished as such. In the course of the research, the review team heard several examples of how the distinction between humanitarian and other actors risks becoming blurred and the relevance of maintaining the principle of independence, including notably e.g. the use of drone jamming equipment, military clothing, and vehicles.

It is very important to ensure that partnerships are underpinned by shared views on values and principles. Much greater attention should be given to the understanding and views of local organisations on humanitarian response in relation to their work. Yet in a sector that remains rife with sub-contracting arrangements and driven by efficiency considerations, it is likely that deep engagement on values and principles between an international and local partner to reach agreed arrangements, unfortunately, remains more the exception than the rule.

The engagement of humanitarian donors. The instrumentalisation of humanitarian aid for political purposes is the main challenge to the principle of independence. Donor governments are also political and military supporters of Ukraine, and their visibility requirements—logos, flags, public messaging—can compromise the perceived and actual independence of humanitarian actors. From a principled perspective, the issue is the extent to which organisations are concerned about being instrumentalised. Too many compromises that favour political agendas ultimately undermine recognition of the value of principled humanitarian action and acceptance by all the parties to a conflict, a cost magnified by the visibility and sheer size of the intervention in Ukraine. The major donors are also primarily governments, which means that they are political actors. The fact that Ukraine is relatively well-funded compared to other crises is not a coincidence.

The combination of political and humanitarian support has implications for humanitarian organisations that are keen to stress their independence and neutrality. Even more so, it may impact the safety of humanitarian workers. There is no such thing as non-political humanitarian aid from donor governments in Ukraine, but this does not preclude a dialogue on the extent to which there should be a humanitarian carve-out to ensure a better separation between humanitarian and other forms of assistance.

Recommendations

Coordination

1. **Humanitarian coordination platforms, such as the Humanitarian Country Team (HCT)**, should employ the humanitarian principles as the framework for their consultations, whether these are general coordination discussions, or specifically devoted to principled issues, such as access. For example, discussions on prioritising those most in need are about impartiality, especially proportionality; and reaching them will rely upon neutrality and independence. This discussion requires operational actors to be more honest about their unique role in the response. Further to framing operational coordination within humanitarian principles, the HCT and other coordination platforms should hold regular in-depth consultations (e.g. at least quarterly) on the application of humanitarian principles, such as those that took place during the HCT workshop in November 2025. Where interagency documents, such as Humanitarian Needs and Response Plans (HNRPs), speak of principled humanitarian action, they should provide explanations as to what is meant in the Ukraine context; what issues must be navigated as a matter of principle, and require a balanced decision. Organisations such as the Centre on the Competence of Humanitarian Negotiations stand ready to assist operational actors in these discussions.

2. **The HCT should undertake a periodic review of the use of the Joint Operating Principles (JOP) through a principled lens.** The JOP should be expanded to include guidance on operationalising each of the four principles in Ukraine: defining their implementation, setting out red lines, and creating a framework for deliberating these issues. Specific attention should be paid to current issues such as the colours of vehicles and outfits, and the use of devices that detect drones. Devices that jam GSM signals of the drones should not be used by humanitarian organisations seeking to deliver a principled response. The legal analysis that the review team received should be widely distributed. For those actors providing relief and carrying out evacuations on frontlines, the humanitarian leadership should provide alternative options that help them to carry out their work in relative safety.

Operational

3. **There should be concerted mutual learning efforts involving staff** of UN agencies, the International Committee of the Red Cross (and Red Crescent), INGOs, NGOs, local CSOs and volunteer networks to address the low levels of knowledge on IHL and to ensure that staff are up to date on what it means to apply a principled approach generally, and in this particular context. National and sub-national authorities and diplomatic staff in Kyiv should also be participants in such workshops.

4. **Partnerships between international and Ukrainian organisations** should involve dialogue on what it means to deliver a principled approach. Requiring local organisations to subscribe to the four principles solely as part of an administrative and due diligence check in developing contractual and funding arrangements renders the principles meaningless. This issue should also be discussed by working groups tasked at the global level with improving the international—national interface, such as the Grand Bargain and pooled fund working group.

Policy

5. **Member states and high-level UN leadership** should engage in a dialogue with both parties to the conflict and end the asymmetry in humanitarian negotiations. High-level efforts involving UN institutions and member states should be launched to ensure that humanitarian considerations, including unimpeded access, are part of any political settlement to the conflict. Russia's permanent membership of the UN Security Council is an opportunity to allow for discrete engagement at the New York level. These diplomatic consultations and negotiations on a peace settlement or truce should also be devoted to strengthening respect for IHL.

6. **Donors and humanitarian organisations** should engage in a dialogue, such as the meetings of the Senior Officials Meeting (SOM), that discusses the extent to which governments and EU institutions can support principled humanitarian action by avoiding blurred lines between the various forms of aid and support to Ukraine. There should be a better separation between humanitarian and other forms of assistance in Ukraine.

1. Introduction

The value of life and the worth and fundamental dignity of every human being have been translated into the four core humanitarian principles of humanity, impartiality, neutrality, and independence. The cornerstones of humanitarian action, these principles provide the ethical foundations of humanitarian response, and are essential elements of the effectiveness of humanitarian programming. At the same time, principled humanitarian programming, replete with **principled humanitarian compromise, can never be taken for granted**, as shown by the humanitarian response in Ukraine.

Compounding the Russia-Ukraine armed conflict that started in 2014 in Donbas, and the annexation of Crimea, Russia launched a full-scale invasion from Russian and Belarusian territories into northern, eastern, and southern Ukraine in February 2022. While bearing the hallmarks of many humanitarian crises around the world—mass displacement; significant damage to civilian infrastructure; and hundreds of thousands of people killed, injured, or maimed—the Ukraine crisis also presents a unique challenge for the humanitarian endeavour.[1] Since its beginnings, the environment of the war in Ukraine has been highly partisan. Humanitarian funding levels have been unprecedented, and Ukrainian civil society and humanitarian staff on the ground—both national and international—have found themselves in a national response of "humanitarian resistance". This concept, borrowed from Hugo Slim, describes the tension between the traditional humanitarian sector and "the rescue, relief, and protection of people suffering under an unjust enemy regime [...] specifically organised by individuals and groups who are politically opposed to the regime and support resistance against it."[2] In such a context, the delivery of impartial, neutral, and independent humanitarian aid takes place under significant pressure. This pressure is further compounded by the dual position of most major donors, who are simultaneously the primary funders of the humanitarian response and the key providers of political and military support to Ukraine.[3]

In addition to these tensions within the country, the Ukraine response takes place within a global context that sees increasing challenges to the humanitarian endeavour. From the outside: a regression of adherence to international law, a chronic funding deficit exacerbated by significant budget reductions from major donor countries, and conflicts posing ever-greater lethal risks to humanitarian personnel. From the inside: a deep questioning of sectoral dynamics that continue to reinforce the historical supremacy of the Western orientation of humanitarian action, including the role of the principles and the engagement of international actors with national and local responders. This situation triggers a particular need to better articulate the narrative around the humanitarian principles. Conversations around the meaning, value, and impact of the principles, and the clash of foreign policy objectives with humanitarian goals are also heard outside Ukraine, most notably in relation to the Israeli assault on Gaza.

Led by Danish Refugee Council (DRC) with the support of the Swiss Agency for Development and Cooperation (SDC), and guided by a Steering Committee,[4] this report aims to contribute to a more timely, effective, and accountable humanitarian response in Ukraine by informing

1 Norman, *Humanitarian Principles Are Under Fire in Ukraine*. See also Tiara Ataii, 'Why Ukraine Is Moving the Needle on Old Debates about Humanitarian Neutrality', *The New Humanitarian*, 16 May 2023 and François Grünewald, 'The Humanitarian Response in Ukraine: Reconsidering "Our" Principles and Models', *Humanitarian Aid on the Move* 24 (December 2022): 66–75.

2 Slim, "Humanitarian Resistance: Its Ethical and Operational Importance."

3 Hargrave et al., *Narratives and the Ukraine Response: Implications for Humanitarian Action and Principles*; People in Need, "Neutrality in the Humanitarian Response in Ukraine."

4 The Steering Committee comprised the Humanitarian/Resident Coordinator in Ukraine as well as senior representatives of World Food Programme (WFP), Office for the Coordination of Humanitarian Affairs (OCHA), DRC, People In Need (PIN), Right to Protection (R2P), NGO Girls, European Union (EU), and SDC.

the collective reflection around the understanding and role of principled humanitarian assistance and protection. Building on previous similar research,[5] the report also contributes to a wider discussion on challenges and opportunities related to principled humanitarian response globally.

There is broad recognition that the four humanitarian principles codify the meaning of humanitarian action, particularly in situations of armed conflict, and have become a core component of the humanitarian identity. [6] The principles serve to distinguish humanitarian action from other motivations or agendas. That said, the humanitarian principles are more than just an identity marker; they have a highly practical dimension. Generally seen as a cornerstone of humanitarian aid effectiveness, the principles have been conceived to guide humanitarian organisations in their day-to-day work, to enable access, to set priorities, to determine the parameters for engagement with non-humanitarian actors and warring parties, help ensure the safety of humanitarian workers and the people they support, and tailor responses to specific circumstances.[7] Many of the operational decisions or choices, however mundane the issue, have a principled basis.

While the core principles are vital for distinguishing humanitarian aid from other forms of assistance, their application is not rigid. It requires context-specific interpretation and involves balancing compromises.[8] The delivery of humanitarian aid in complex environments is by nature a balancing act between oft-competing priorities, and **there is no such thing as a fully principled approach. "Principled compromises" are called for, however, rather than "compromised principles".**[9] Ongoing reflection and analysis on the trade-offs and impacts should inform decision-making. Linked to the interdependence that exists among humanitarian organisations, continuous exchange and mutual learning on what works and what works less well are prerequisites to addressing the individual and collective challenges to principled humanitarian action. This becomes all the more important in a global context that sees a decline in humanitarian funding, emphasising the need for prioritisation that favours principled humanitarian responses and accountability.

1.1. Scope and approach

Importantly, the purpose of the research behind this report has not been to review a specific organisation's programme or operations, but rather to engage various partners representing a significant sample of the Ukraine humanitarian architecture and to determine whether existing coordination mechanisms and implementation modalities have been effective in enabling principled responses.

In light of its purpose and objectives, the research has hinged on two main tasks: 1) capturing and analysing how aid/crisis responders in Ukraine approach the humanitarian principles conceptually and practically; and 2) identifying the challenges related to principled delivery

5 Schenkenberg and Wendt, *Principled Humanitarian Assistance of EU Partners in Iraq; Montemurro and Wendt, Principled Humanitarian Programming in Yemen—a 'Prisoner's Dilemma'*?; DRC, "Principled Humanitarian Action in Afghanistan"; Schenkenberg et al., "Lost in Sudanisation? What It Means to Apply a Principled Humanitarian Approach in the Response to the Crisis in Sudan."

6 The four core principles (humanity, impartiality, neutrality, and independence) find their origin in the Fundamental Principles of the International Red Cross and Red Crescent Movement, proclaimed in Vienna in 1965. For NGOs, the principles are laid down in the 1994 Code of Conduct for the International Red Cross and Red Crescent Movement and NGOs in Disaster Relief. The principles are enshrined in various international instruments, including UN General Assembly Resolution 46/182 (1991) and subsequent resolutions (e.g. UNGA Res. 58/114—2004) and, especially relevant for the European Union, the European Consensus on Humanitarian Aid adopted by the EU institutions and the Member States in December 2007.

7 Labbé, "How Do Humanitarian Principles Support Humanitarian Effectiveness."

8 United Nations Evaluation Group, *UNEG Guidance on the Integration of Humanitarian Principles in the Evaluation of Humanitarian Action*.

9 DuBois and Healy, "Imperfect Relief: Challenges to the Impartiality and Identity of Humanitarian Action."

as faced by national and international aid/crisis responders, and how these relate, now and in moving forward, to localisation and coordination with national actors.

In referring to "aid/crisis responders" in Ukraine, the aim has been to include all actors that have, more or less directly, participated in some way in the programmatic responses to the humanitarian crisis, including the Ukrainian authorities, humanitarian agencies (UN agencies, local, national, and international NGOs), donors, and other local civil society actors.

The research has been anchored in an analytical framework (see Annex 1) that has been specifically adjusted for this research to ensure an analytical focus on the relationships between aid/crisis responders and civil society actors, national Ukrainian authorities, and international donors.[10]

The geographical scope of this research has been Ukraine-wide, but given the size of the country, the scope of operations, and the significant access restrictions to areas not within the control of the Ukraine government, it has not been possible to cover all areas of the country to the same extent. To allow for a sound representation of all areas of Ukraine, four categories of particular contexts and dynamics of humanitarian aid delivery in Ukraine were identified, and the research endeavoured to cover all four categories equally (see Table 1). It should be noted, however, that while the research team spoke with a few aid/crisis responders who also work in the OTs of Ukraine, this category was less covered than the others given the limitations in humanitarian access and certain legal restrictions as well as the few organisations working there.

10 Earlier versions of this framework were developed for a multi-year study looking at the role of mandates in humanitarian aid delivery in armed conflict (Montemurro and Wendt, "Unpacking Humanitarianism." HERE-Geneva (2020)) and subsequently applied and refined in the context of previous reviews of principled humanitarian assistance in Iraq, Yemen, and Sudan. The initially framework draws from ideas developed by Schenkenberg van Mierop, "Coming Clean on Neutrality and Independence: The Need to Assess the Application of Humanitarian Principles."

Table 1: Ukraine area contexts

Category	Characteristics/needs	Areas
1: Front-line oblasts/regions	Characterised by a severe security situation, constrained humanitarian access, high numbers of internally displaced persons (IDPs). Including de- occupied territories previously under Russian control and retaken by GoU	Mykolaivska, Sumska, Kharkivska, Luhanska (mostly non-government-controlled), Donetska, Dnipropetrovska (which also hosts many organisations supporting front-line areas from Dnipro city), Zaporizka, Khersonska oblasts.
2: Western oblasts of Ukraine	These regions host large numbers of IDPs but have experienced reduced funding and were deprioritised in the 2025 Humanitarian Needs and Response Plan, leading many organisations to shift focus to front-line areas only.	Lvivska, Rivnenska, Ternopilska, Khmelnytska, Chernivetska, Volynska, Zakarpattska oblasts.
3: Other regions	Includes oblasts that do not fall into the front-line or Western categories.	Kyivska, Poltavska, Vinnytska, Zhytomyrska, and others.
4: Occupied Territories (OTs)	With significantly restricted access, limited reliable data, and few informants (sources have included include local organisations involved in evacuations as well as secondary reporting).	Most of Luhanska and Donetska oblasts, parts of Zaporizka, Khersonska, Kharkivska, and Sumska oblasts.

1.2. Methods

This report draws from qualitative research, based on semi-structured interviews with key informants (including national NGOs and Civil Society Organisations (CSOs), international NGOs, UN Agencies, Ukrainian authorities, and donor representatives), workshops carried out with a number of collective mechanisms and networks in Ukraine, and an extensive document analysis.

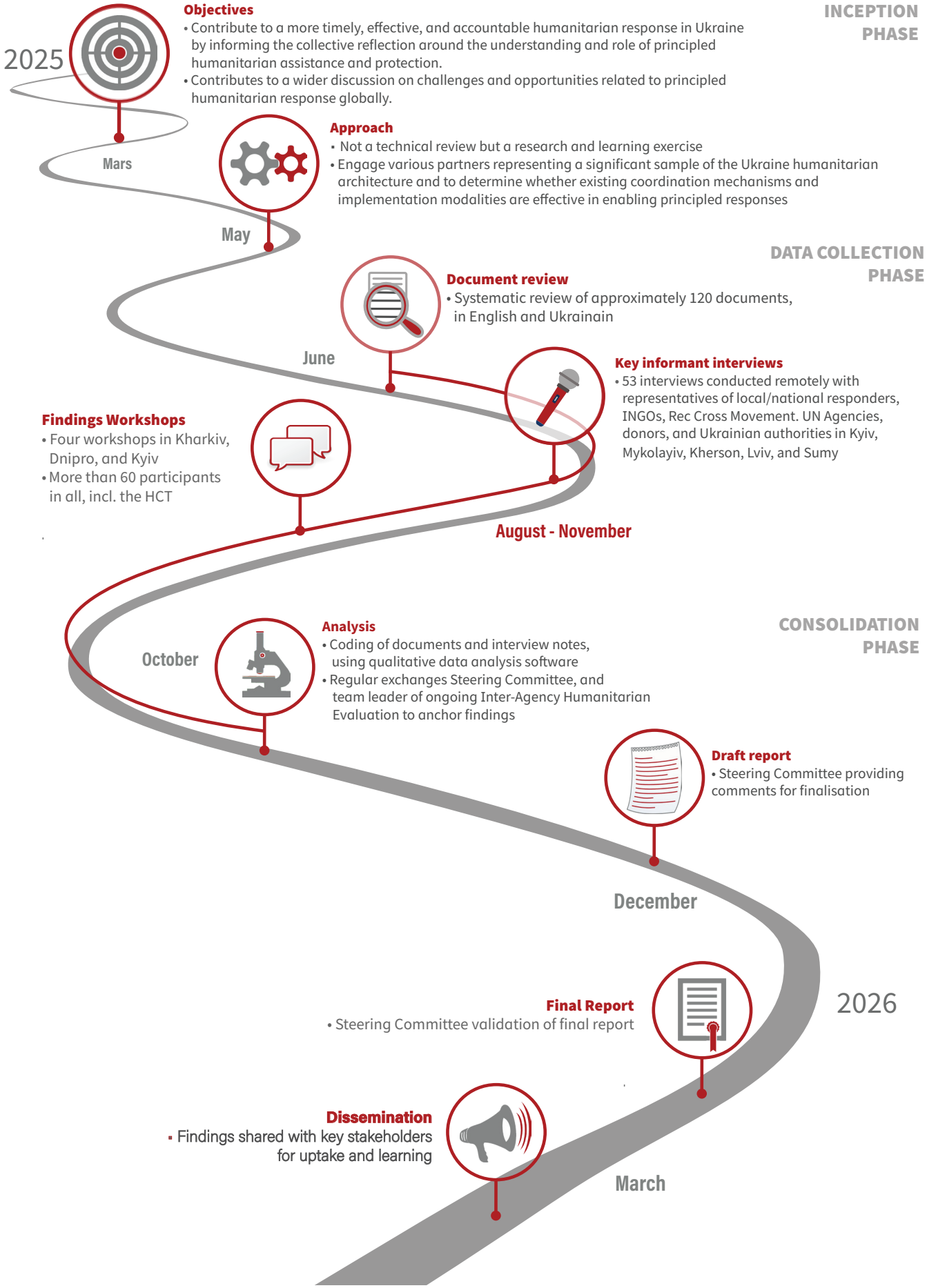
The research team conducted 53 remote semi-structured interviews with key informants between August and November 2025, guided by the analytical framework presented in Annex 1. Breakdown of key informants:

- 16 representatives of different International Non-Governmental Organisations (INGOs).
- 2 representatives of the Red Cross/Red Crescent Movement (comprising the International Committee of the Red Cross (ICRC) and the Ukrainian Red Cross Society (URCS)).
- 13 representatives of different National Non-Governmental Organisations (NNGOs) and Ukrainian civil society.
- 10 representatives of different United Nations agencies.
- 6 representatives of Ukrainian authorities, including members of the Mykolaiv and Lviv City Councils, the Kherson City Military Administration, the Sumy Regional Administration, the Mykolaiv Health Department, and the Kherson Regional Development Agency. Exchanges in writing were also held with the relevant national authorities of Ukraine.
- 5 representatives of different donors, including both headquarters and Ukraine-based.
- 1 independent consultant.

The series of interviews was supplemented by four workshops held from November 11 to 14, 2025, in Kyiv, Kharkiv, and Dnipro. These workshops brought together over 60 representatives from donors, UN agencies, the Ukrainian Red Cross Society, and international and national NGOs to discuss and confirm preliminary directions and findings.

A comprehensive literature review was conducted, analysing both public and non-public literature. This included documentation produced by organisations such as corporate documents and internal reviews, as well as UN planning documents (Humanitarian Response Plans (HRPs)), needs assessments (Humanitarian Needs Overviews), and previous system-wide assessments, as well as studies and articles concerning the conflict, the subsequent international humanitarian response, and academic literature on principles. A review of Ukrainian-language media was also conducted.

An overview of the process and methods for data collection and analysis can be found in Figure 1.


2025
Mars
May
June
August - November
October
December
2026
March
INCEPTION PHASE
DATA COLLECTION PHASE
CONSOLIDATION PHASE
Objectives
• Contribute to a more timely, effective, and accountable humanitarian response in Ukraine by informing the collective reflection around the understanding and role of principled humanitarian assistance and protection.
• Contributes to a wider discussion on challenges and opportunities related to principled humanitarian response globally.
Approach
▪ Not a technical review but a research and learning exercise
• Engage various partners representing a significant sample of the Ukraine humanitarian architecture and to determine whether existing coordination mechanisms and implementation modalities are effective in enabling principled responses
Document review
• Systematic review of approximately 120 documents, in English and Ukrainain
Key informant interviews
• 53 interviews conducted remotely with representatives of local/national responders, INGOs, Rec Cross Movement. UN Agencies, donors, and Ukrainian authorities in Kyiv, Mykolayiv, Kherson, Lviv, and Sumy
Findings Workshops
• Four workshops in Kharkiv, Dnipro, and Kyiv
• More than 60 participants in all, incl. the HCT
Analysis
• Coding of documents and interview notes, using qualitative data analysis software
• Regular exchanges Steering Committee, and team leader of ongoing Inter-Agency Humanitarian Evaluation to anchor findings
Draft report
• Steering Committee providing comments for finalisation
Final Report
• Steering Committee validation of final report
Dissemination
▪ Findings shared with key stakeholders for uptake and learning

2. Context

This section outlines the particularities of the context of Ukraine because the application of the humanitarian principles requires context-specific interpretation. Notably, the humanitarian response in Ukraine is taking place amid immense geopolitical tensions between the Russian Federation and many—predominantly Western—countries, who actively support Ukraine politically and militarily and who are also the main donors of development and humanitarian aid. **The "aid ecosystem" in Ukraine is exceptionally broad**, including local volunteer groups that deliver aid directly to the Ukrainian Armed Forces, often alongside support to civilians.

2.1. The provocation of a massive, humanitarian crisis

Following Russia's annexation of Crimea in March 2014, pro-Russian uprisings in the east led to the proclamation of the "people's republics" of Donetsk and Luhansk in April, marking the start of hostilities in Eastern Ukraine. As of mid-2014, several international humanitarian organisations, such as ICRC and UNHCR, established a presence, undertook needs-assessments, or provided support in the region. WFP launched its first emergency operation in September 2014, providing food assistance to 120,000 people.[11] By the end of 2014, more than 542,000 people had been registered as IDPs with the cluster system activated to coordinate the response. The international system's response plan for 2015 requested 189 million USD to assist 900,000 people out of 1.4 million in need.[12] By the end of 2015, it was estimated that 3.7 million people were affected by the conflict, with 3.1 million in need of humanitarian assistance.[13]

As attempts at a diplomatic settlement, with the Minsk agreements (in September 2014 and February 2015), failed to establish lasting peace, hostilities continued that year, with a reduction in September 2015 thanks to a ceasefire. This led to reduced planning figures for 2016 with the HRP for that year targeting 2.5 million people. The 2016 HRP noted a particular concern for the 800,000 people living along the contact line. It also distinguished between those in Government controlled areas (GCAs) and those in so-called "non-government-controlled areas" (NGCAs).[14] Entrance and exit checkpoints allowed for the crossing of people and goods between these areas, and for the (crossline) transport of relief items.

In March 2017, an economic blockade imposed by Ukrainian activists, followed by the so-called nationalisation of Ukrainian enterprises in the OTs, severely worsened the economic situation on both sides of the contact line. Restrictions on the freedom of movement also impacted the living conditions of people living in the OTs, especially the elderly as they had to travel to Ukrainian Government-controlled territory to collect their social benefits, withdraw cash, or seek medical care, and purchase food and medicines.[15]

While a joint assessment found that 1.2 million people were food insecure in 2017—nearly double from the previous year—due to limited resources and access constraints, WFP ended its operations in the country involving cash, food vouchers, and locally purchased food rations, in April 2018.[16] By late 2018, the number of affected people reached 5.2 million, of whom 3.4 million needed humanitarian assistance. It was estimated that the elderly

11 WFP, *Ukraine Situation Report #4, 23 October 2014—Ukraine | ReliefWeb.*

12 OCHA, *Ukraine Strategic Response Plan 2015—Ukraine | ReliefWeb.*

13 OCHA, "Ukraine: Humanitarian Needs Overview 2016."

14 This latter term has no basis in international law, as the 1949 Four Geneva Conventions refer to Occupied Territories. See also the analysis of section 3.3.

15 OCHA, *Ukraine Humanitarian Needs Overview 2018.*

16 WFP, "WFP Ukraine Country Brief February 2018."

represented nearly 30% of those in need, the highest proportion globally in any humanitarian crisis.[17]

In 2019, its first year of existence, the Ukraine Humanitarian Fund (UHF) disbursed USD 3.2 million, of which USD 1.4 million (44%) was directly allocated to national and local NGOs. In 2020, the Fund scaled up its operations, disbursing USD 7.5 million, with USD 2.6 million (35%) going to national and local NGOs. In 2021, figures reached USD 11.6 million, including USD 5.4 million (47%) for national and local NGOs.[18]

Meanwhile, access to and within the OTs became severely restricted. By late 2018, only four international organisations were officially authorised to operate in Luhansk oblast.[19] The HRP for 2019[20] put the number of people in need of assistance at 3.4 million. Monthly crossings of the contact line still averaged 1.2 million, with the elderly accounting for some 60% of these movements, underscoring their continued dependence on services and pensions in Government-held territory.[21] In 2020, a new ceasefire agreement brought a significant reduction in hostilities. This fragile respite, however, coincided with the COVID-19 pandemic, which also resulted in the near closure of all contact line crossing points and an increase in needs of people living in the OTs with only 21 organisations delivering assistance there that year.[22]

In 2021, under the combined strain of protracted conflict involving a steady increase in the number of ceasefire violations, and the pandemic, the humanitarian situation continued to deteriorate further, particularly in terms of health, food security, and protection. Negative coping mechanisms became widespread: 40% of households cut health spending, and nearly a third borrowed food.[23] The overall security situation in the regions of Donetsk and Luhansk remained extremely fragile, with a tense atmosphere created by increasingly hostile rhetoric by the parties to the conflict that same year. It was estimated that some 120 organisations were delivering humanitarian assistance by the end of 2021. Of these, around 22 organisations were able to operate in the occupied territories.[24] It has been estimated that in this period, between April 2014 and the end of 2021, the conflict had resulted in more than 3,100 civilian deaths and over 7,000 injuries, with 2.9 million people in need of humanitarian assistance on the eve of the full-scale invasion.[25]

The full-scale Russian invasion of Ukraine on 24 February 2022 brought continued shelling and air strikes, systematic targeting of civilian infrastructure, and the destruction of towns and cities,[26] causing mass displacement and widespread disruption to essential services such as health care, water, energy, and education. By October 2025, the Office of the United Nations High Commissioner for Human Rights (OHCHR) had verified 14,534 civilian deaths and 38,472 injured since Russia's full-scale invasion.[27] However, this does not include the hundreds of thousands more who have been killed or wounded on the battlefield. By April 2025, more than 3.7 million people in Ukraine were internally

17 OCHA, "OCHA Ukraine Situation Report, 20 Dec 2018"; OCHA, *Ukraine Humanitarian Needs Overview 2018*.

18 OCHA, *Ukraine Humanitarian Fund 2020 Annual Report*; OCHA, *Ukraine Humanitarian Fund Annual Report 2021*.

19 OCHA, *Ukraine Humanitarian Needs Overview 2018*.

20 OCHA, *Ukraine*.

21 OCHA, *OCHA Ukraine Situation Report, 22 June 2021*.

22 OCHA, *OCHA Ukraine Situation Report, 22 June 2021*; OCHA, *Humanitarian Response Plan Ukraine 2021 | United Nations in Ukraine*.

23 OCHA, *Humanitarian Response Plan Ukraine 2021 | United Nations in Ukraine*.

24 OCHA, *Ukraine—Humanitarian Response Plan 2022 (February 2022)*.

25 OCHA, *Ukraine Humanitarian Needs Overview 2022* (February 2022); OCHA, *Ukraine—Humanitarian Response Plan 2022 (February 2022)*.

26 OCHA, "Humanitarian Response Plan: Ukraine. Humanitarian Programme Cycle 2023."

27 OHCHR, "Ukraine: Protection of Civilians in Armed Conflict—October 2025 Update."

displaced, and by December 2025, 5.6 million Ukrainians had become registered refugees abroad.[28] Over 50 aid workers have been killed in Ukraine since 2022.[29]

While the first stages of the war saw a more identifiable frontline, the conflict now sees increasing attacks at sites throughout the country. In 2026, 10.8 million people are identified as in need of humanitarian assistance,[30] with vulnerabilities particularly acute along the front lines and in regions near the Russian border.

Known needs pertain mainly to protection, education, WASH, health, shelter, NFIs, and livelihoods.[31] Humanitarian access to the OTs has remained almost non-existent in spite of repeated efforts to obtain permission to assess needs and provide assistance.

2.2. The multi-faceted humanitarian engagement

The massive invasion by the Russian Forces (RF) on 24 February 2022 has been at the centre of international attention, creating pressures to swiftly scale up the humanitarian response, and triggering extraordinary levels of solidarity, including various forms of support from governments and civil society in Europe, North America, and elsewhere. Public humanitarian appeals for Ukraine are some of the largest, fastest, and most generously ever funded.[32] The UN Ukraine Flash Appeal 2022 of more than USD 4 billion was funded at an unprecedented 87.9%, and the 2023 Humanitarian Response Plan—also close to USD 4 billion—was funded at 73.9%. Funding shortfalls in 2025, due to reductions in aid funding across the humanitarian sector, have led to lower levels of humanitarian assistance,[33] but the Ukraine response remains among the best-funded globally: it received the third most funding in absolute terms in 2024,[34] and the fourth most in 2025.[35] The UN's USD 2.6 billion appeal to assist Ukraine that was launched in 2025[36] was funded at 47% as of the end of November 2025. Most of the humanitarian funding comes from European donors, the top three so far in 2025 being EU, Norway, and Germany.[37] It should be noted that while there has been a decrease in humanitarian funding for Ukraine, financial and humanitarian aid allocations (excluding military aid allocations) taken together have been reported as relatively stable.[38] The unprecedented levels of resources allowed for and drove the rapid mounting of operations inside Ukraine as well as in neighbouring countries (in response to the flow of refugees). **The months following the full-scale invasion resembled expressions of solidarity more than stable programming adapted to the environment** and linked to specific needs assessments, with a certain level

28 ACAPS, "Ukraine: Crisis, Conflict, Refugees, and Aid Efforts" with references to: Operational Data Portal, "Ukraine Refugee Situation"; IOM, *Ukraine—Internal Displacement Report — General Population Survey Round 20 (April 2025)*; HOCHR, "Ukraine: Protection of Civilians in Armed Conflict—June 2025."

29 The Aid Worker Security Database has verified 48 aid worker deaths in Ukraine between 2022 and 31 December 2024 (See https://www.aidworkersecurity.org/incidents/report/map?start=2022). At least four more have been killed in 2025 (OCHA, "Aid Workers Who Devote Their Lives to Helping People in Need Must Be Protected.")

30 OCHA, "Ukraine Humanitarian Needs and Response Plan 2026."

31 ACAPS, *Ukraine: Crisis, Conflict, Refugees, and Aid Efforts*.

32 Guensburg, "Humanitarians Cheer Generous Aid to Ukraine but Fear Cost to Other Crises"; Sajjad, "Generous Aid to Ukraine Is Diverting Resources Away from Other Refugee Crises Around the World."

33 Le Poidevin, "UN Refugee Agency Reduces Support for Ukrainians Fleeing Frontline."

34 See https://fts.unocha.org/global-funding/overview/2024.

35 See https://fts.unocha.org/global-funding/overview/2025.

36 OCHA, "UN Relief Chief Calls for US$2.6 Billion to Support Ukraine's 2025 Humanitarian Plan."

37 See https://fts.unocha.org/countries/234/summary/2025.

38 https://www.kielinstitut.de/topics/war-against-ukraine/ukraine-support-tracker/. See also Kiel Institute, "Ukraine Support Tracker: Military Aid Falls Sharply despite New NATO Initiative."

of disorganisation as agencies sought to establish offices, scale up hiring, and engage in the process of understanding an unfamiliar setting.[39]

The local reaction was substantial: Ukrainian national NGOs and and long-term CSOs, religious and faith-based organisations, professional unions, and community foundations that pivoted or repurposed themselves to the war effort, were joined by a multitude of spontaneous and newly formed volunteer networks. This review refers to these organisations interchangeably as national/local responders, while recognising there are substantial differences in size, capacity, and experience. National actors within Ukraine (and in neighbouring countries) have played significant roles, delivering critical aid and creating joint platforms such as the CSO Alliance in Ukraine. They have successfully advocated for greater inclusion of national NGOs in the Ukraine Humanitarian Fund, and better, inclusive coordination with a prominent seat for local actors. They have also managed to familiarise themselves with the jargon of the international humanitarian community, and have engaged with the relevant coordination mechanisms, not only in Ukraine but also with platforms at the global level, such as the Grand Bargain. Despite this, international organisations continue to receive most funding, mounting large operations inside Ukraine and in neighbouring countries.

From its onset, the 2022 full-scale invasion of Ukraine has been widely held to constitute a violation of the UN Charter and an act of aggression under international law,[40] which has significantly affected approaches to the humanitarian principles. As put by Humanitarian Outcomes:

"Powerful feelings of national unity among Ukrainians in the face of the Russian offensive has inevitably pervaded humanitarian action in the country, giving it an expression much more of solidarity than principled humanitarian neutrality and impartiality. For many Ukrainian volunteer groups and authorities, there is no defensible line separating aid to civilians with support to the military efforts, which they see as one and the same."[41]

Since the escalation of the war, the traditional way of working of international humanitarian agencies has not been without criticism in Ukraine. The ICRC, for example, faced a crisis of legitimacy following its high-level diplomatic exchanges with Russia in March 2022. The widely publicised photo of the handshake between ICRC President Peter Maurer and Russian Foreign Minister Sergey Lavrov, and the subsequent discussions regarding the opening of an ICRC office in Rostov-on-Don, sparked intense controversy. The outcry over this meeting had direct operational consequences for the ICRC and its Red Cross partners in Ukraine, particularly for the Ukrainian Red Cross, which, although a separate entity, was often confused with the ICRC by the public. Following the controversy, many Ukrainians publicly discouraged donations to the ICRC and the Ukrainian Red Cross, arguing that aid was not reaching its intended beneficiaries[42] and that the ICRC's supposedly "neutral" stance tacitly legitimised Russia's position.[43] Neutral humanitarian engagement would make humanitarians ineffective, if not complicit, in the eyes of Ukrainian actors, thus reinforcing the alternative model advocated by local civil society organisations.[44] Similarly, Ukrainian media and analysts portrayed the visit of the ICRC President to Moscow as an attempt to legitimise Russia and questioned the ICRC's adherence to its own principles, with one analysis even asserting that the organisation's statements

39 See e.g. Saez, "Navigating Humanitarian Dilemmas in the Ukraine Crisis," 5; Grünewald, *Real-Time Evaluation of the Humanitarian Response to the Crisis Resulting from the War in Ukraine, 8*; Humanitarian Outcomes, "Enabling the Local Response: Emerging Humanitarian Priorities in Ukraine March–May 2022," 14.

40 See e.g. Brunk, "International Law and the Russian Invasion of Ukraine"; Dworkin, "International Law and the Invasion of Ukraine"; Nael, "The War in Ukraine and International Law"; UN, "Russia's Invasion of Ukraine Is a Violation of the UN Charter, UN Chief Tells Security Council."

41 Humanitarian Outcomes, "Enabling the Local Response: Emerging Humanitarian Priorities in Ukraine March–May 2022," 4.

42 Bodnyauk, "Комітет Червоного хреста хоче відкрити офіс в російському Ростові-на-Дону."

43 Hyde, "Evacuation Challenges and Bad Optics."

44 Hargrave et al., *Narratives and the Ukraine Response: Implications for Humanitarian Action and Principles*.

"are not in accordance with its principles."[45]

Another significant challenge has been faced by organisations seeking to deliver principled humanitarian responses in OTs, where they have encountered major restrictions. With reference to its 'Foreign Agent' law, Russian authorities allow limited to no access for humanitarian organisations to the OTs and requirements for a Russian passport as well as restrictions on the movement of civilians, have also prevented residents from accessing essential services.[46] Ukraine too has issued restrictions, and the enactment of martial law on 24 February 2022 blurs the division between civil and military authorities. Since 2022, Ukrainian legislation stipulates that those actors working in the OTs may be designated as collaborators and can be legally prosecuted. While this legislation has so far not been applied to humanitarian organisations, it creates risks for them to work in the OTs.[47]

Importantly, in October 2022, the UN General Assembly adopted Resolution ES-11/4 on the territorial integrity of Ukraine, calling on states and international organisations not to recognise any change by Russia in the status of Ukrainian territories.

2.3. The specificity of the humanitarian context in Ukraine

In many ways, the war in Ukraine presents a similar humanitarian context when compared to other complex humanitarian emergencies. People living close to the frontline have acute needs in terms of, for example, their safety and protection, livelihoods, shelter, or access to healthcare. But in several other ways, Ukraine stands apart from the majority of contemporary humanitarian crises.

First is the fact that it is an international armed conflict started by a permanent member of the UN Security Council as it invaded a sovereign UN Member State. The geo-political stakes are enormous, and humanitarian aid has been part of the wider and much larger package of political, financial, and military support from predominantly Western countries. This aid package also reflects that this war is the largest international armed conflict in Europe since the Second World War. In much of Europe, there was a palpable affinity with Ukrainians, and an extraordinary acceptance of refugees from the war compared to those from other continents. Critics have argued that the global, allied response to Ukraine was disproportionate at the international level, with serious consequences being borne by crisis-affected and neglected populations elsewhere.[48] The strong alignment of geo-political self-interest and donor preferences have led to a humanitarian response in Ukraine that is part of a broader and much bigger package of support to Ukraine.

Second is the extensive, highly functional Ukrainian response at national, oblast, and communal levels, which combines with the strong sense of national purpose. In fact, the response in Ukraine has become one where the localisation of aid is a significant component of the reality—thanks to a long vibrant and highly skilled civil society. A number of local civil society organisations have transformed themselves from "first responders" to operational humanitarian actors. Over the years of this war, their influence has gone far beyond the localisation of the aid agenda as seen in other crises. For many Ukrainian civil society organisations and volunteers, providing aid is an act of solidarity inseparable from the defence of their state and their identity. This manifests in the explicit rejection of neutrality by some local groups, who view

45 Kucherenko, "Ілюзія Нейтралітету."

46 Amnesty International, *Ukraine 2024 Report*.

47 Human Rights Watch, "Ukraine: Flawed Legislation on Collaboration—Some Provisions Lead to Unjust Prosecutions"; Bowler, "Ukraine's Legal Dilemma—Coerced or Collaborator? Kyiv Law Probes Russian-Occupied Ukraine"; OHCHR, "Detention of Civilians in the Context of the Armed Attack by the Russian Federation against Ukraine—22 February 2022—23 May 2023."

48 Saavedra-Lux et al., "Beyond Ukraine and Gaza."

it as morally untenable in the face of invasion, and in the close, sometimes indistinguishable, collaboration between civilian responders and the national defence effort. Their rejection has been described as "humanitarian resistance,"[49] an approach that is different from traditional humanitarian action.

Thirdly, Ukraine is presenting some specific challenges not seen as prominently in other humanitarian crises, such as the sheer percentage of older people, which make up for over a quarter of Ukraine's population. Most of those remaining in front-line towns are older people, who make up a disproportionate number of civilian casualties. Likewise, last-minute evacuations of those Ukrainians remaining in frontline areas, sometimes even in zones that are best described as no-man's land, are often elderly with reduced mobility. It is common that they refuse to leave until the last minute, or do not wish to leave at all.

To add to this are the challenges that come with the harsh winter conditions. The latest winter has been extremely cold and many (elderly) people in cities have been without heating or electricity due to the continued attacks on civilian energy infrastructure by the Russian Federation.

49 Slim, "Humanitarian Resistance: Its Ethical and Operational Importance."

3. The principles in practice

From the onset of Russia's invasion, large-scale relief efforts have not always been anchored in the four core principles. Nonetheless, the principles have been highly relevant in this crisis. To be sure, following a principled approach in the face of certain challenges is not so simple as waving a magic wand. It calls for deep engagement and frank dialogue, but, essentially, the four principles when applied together, offer guidance when confronted with key challenges. This section highlights what humanitarian engagement with the principles looks like in Ukraine through the lens of the agencies working there, and how humanitarian practice can be understood through the lens of the principles.

3.1. Applying the four principles in Ukraine

Findings

The majority of key informants explained that they do their best to uphold the principles in their work, but many of them also added a surprising caveat, framing the context in Ukraine as "too complex", "too unique", or "too political" for the principles to really play a role. Importantly, a significant number of the key informants—most of them international operational actors, but also some national Ukrainian ones—felt that the principles do not really constitute an enabler for effectiveness in the Ukraine response. Of these, the majority expressed the view that the context is such that it is in any case impossible to be principled in Ukraine.

Key informants also explained that many of the relief efforts did not necessarily follow standard humanitarian practices, mainly because many of the national and local organisations and volunteers in the response were unfamiliar with them. Few local organisations, that partnered with UN agencies or INGOs, have received training on the humanitarian principles that went beyond a presentation of their definitions covering how and why they matter to the humanitarian identity.

This is not to say that the humanitarian principles were never referred to in communications and partner contracts, but rather that they were only referred to.

Given that the humanitarian principles were largely absent from the crowded agenda from the very start of the response, **little time was spent on what operationalising the principles in the context of Ukraine would look like**, at least in the first year. This was echoed by national key informants for this review. In the words of one:

> **"When we started the evacuations in 2022, we did not know about the basic principles and built the system on our own, we lacked knowledge and experience." (National/local key informant)**

A number of key informants explained how the attention provided to the principles has gradually increased as the response has become more established. It appears that learning about humanitarian principles and practices happened while on the job.[50] This is also illustrated by the words of a key informant who noted:

> **"The first year we did not say anything about the humanitarian principles…then we began to understand what the global humanitarian architecture is, how it works. We are in self-study mode." (National/local key informant)**

The evidence that the humanitarian principles were seen as relevant to this response at a later stage is also found in the JOP, which were endorsed by the HCT in early 2023, one year into the response. This document, which has become an instrument commonly adopted by HCTs in crisis contexts, sets out what is expected of organisations that deliver humanitarian services. It includes, among others, guidance on engaging with all parties to the conflict, designing programmes based on impartial and independent needs assessments, and safeguarding the distinction between principled humanitarian activities and other modalities of aid support. In a sense, it provides a platform to ensure that organisations are singing from the same song sheet. Interestingly, this is what the JOP says in the opening:

> **"Compliance with these principles, and applicable international laws, is essential for humanitarian access to all affected populations, the effective and efficient delivery of humanitarian assistance, and the safety of civilians and humanitarian staff."[51]**

And it ends with this:

> **"In case of emerging issues, humanitarian actors agree to raise and bring them to the attention of the HC. In case of dispute, the issue is to be settled within the framework of the HCT."[52]**

It should not require a "dispute" for the HCT to have a discussion on the principles. This is true for every humanitarian crisis, and especially true in a relatively unique crisis such as Ukraine. Efforts to follow up on the adoption of the JOP and make it part and parcel of inter-agency consultations appear to have had mixed results. There has been a JOP Task Force, which in 2025 particularly focused on working in occupied territories, and workshops have been held especially with national NGOs. At the same time, the review team saw little evidence that the JOP had been applied in practice and at the centre of discussions on issues such as humanitarian access.[53]

Analysis

Arguably, since its very beginnings, the rapidly scaled-up Ukraine response in 2022 was not built to be principled: it was conceived primarily as an act of partisan solidarity, aimed at supporting the Ukrainian population in its defence against Russian aggression, rather than as a humanitarian operation. While a number of international humanitarian organisations had been present and coordination structures had been established since 2014, and in some

50 Golub et al., *Consultancy for the Elaboration of a "Duty of Care" Package for Local Humanitarian Responders in Ukraine*, 12.

51 OCHA, "Joint Operating Principles: Ensuring the Delivery of Principled Humanitarian Assistance and Protection in Ukraine."

52 Ibid.

53 It is also somewhat surprising that there is a humanitarian access working group as well as JOP Task Force in the coordination architecture. It would make much more sense that there would be one group on principles and access.

cases earlier, these efforts reflected the previous scale of the conflict in the East. The scale of the new response was of a different order. The unprecedented levels of financial resources allowed for and drove the immediate and rapidly expanding arrival of the international humanitarian community. Relief operations were mounted rapidly in a new and complex environment. At times, the pressure to deliver came at the expense of applying humanitarian principles. However, **it is specifically at the start of a new response that principled framing should occur**, to create clarity and precision in terms of objectives, agenda, and strategy. Such a framing also will help to set priorities, yet the "embedding" of principled decision-making did not happen in Ukraine at the outset.

Somewhat contradictorily, it has also been argued that the response in its first year(s) was principled. This view is, for example, reflected in the "Synthesis of evaluative evidence on the humanitarian crisis in Ukraine" (hereinafter the Synthesis Evaluation) as it finds that UN agencies delivered a principled response because they delivered assistance.[54] This trend to refer to principled humanitarian action without offering further explanations as to what this means goes far beyond the response in Ukraine. It is seen in various humanitarian documents, such as HNRPs and other high-level statements.[55] It suggests that humanitarian actors deliver a principled approach because they call themselves humanitarian. This is precisely what humanitarian actors should avoid.

A principled approach requires proactive reflection and dialogue to address complex operational matters. Without such steps, principled humanitarian action is an empty promise and fails to set criteria, red lines, trade-offs, and agreed compromises for what it means to be a principled humanitarian actor in this setting. The Synthesis Evaluation touches on this issue too, as it notes that agencies did not provide their staff with guidance on how to navigate tensions or manage trade-offs between the principles. It refers to agencies that decided to focus on reaching high numbers of people (considered as in line with humanity) but also adds that these people were not the most vulnerable (contradicting impartiality).[56]

Similarly worrying is the view heard by the review team that the principles could not be applied because the context did not allow for it. The Synthesis Evaluation echoes this view as it notes:

> **"[t]he application of humanitarian principles was […] challenged by the highly politicised environment, access restrictions, and complex relationships with state and non-state actors."**

Critically, the humanitarian principles are intended precisely to help navigate highly politicised environments, like Ukraine, and to address access restrictions and complex relationships. This implicates the role of leadership when it comes to applying a principled approach. The unfamiliarity of parts of civil society with humanitarian action, and of international humanitarian actors with the specificities of Ukraine, meant that the principles were not consistently applied from the start. They were assumed to be applied, seen as irrelevant or as impracticably wishful, and hence not "applicable". This reflects a misunderstanding of how to operationalise the principles.

As for providing specific guidance to staff on how to operationalise the principles or clearly communicating what the principles mean in this context, the review team heard of some workshops and initiatives, but not to the scale needed. Clearly, the JOP provided for an excellent opportunity to frame the principled approach the response needed for it to qualify as humanitarian. Several JOP workshops were held in the months following the endorsement, but

54 Van de Velde and Manili, "Synthesis of Evaluative Evidence on the Humanitarian Crisis in Ukraine," para. 139.

55 IASC, "Statement by Emergency Relief Coordinator Tom Fletcher—The Humanitarian Reset Phase Two."

56 Van de Velde and Manili, "Synthesis of Evaluative Evidence on the Humanitarian Crisis in Ukraine," para. 149.

these have been discontinued. The main focus in relation to the JOP comes from a JOP task force working on efforts to operate in Russian occupied territories.

To be sure, **there is no such thing as a fully principled approach: there are few black-and-white truths in the realm of implementation**. Every humanitarian organisation will have to take decisions that may feel somewhat uneasy as they imply balancing competing demands, which may also feel as concessions on certain principles. This is part of humanitarian action. As such, references that treat the principles as regulations and use wording that reflects a compliance regime are not helpful. The key criterion in assessing the degree to which a response is principled is not necessarily the "what" organisations do (their "work on the ground"), but whether and how agencies have addressed the principles in setting priorities, taking decisions, and managing compromise. **The aim is to ensure deliberate "principled compromises", rather than "compromised principles"**.[57]

Previous reviews related to the implementation of the principles in Iraq, Yemen, and Sudan also found that if and when organisations keep the principles in mind they tend to do so individually—as if behind closed doors—and they hesitate to share at an inter-agency level where and when they run into challenges in applying the principles and have had to make compromises. Put differently, they incorrectly worry that "principled compromise" risks being interpreted as a failure to "comply with" or "adhere to" the principles.

57 DuBois and Healy, "Imperfect Relief: Challenges to the Impartiality and Identity of Humanitarian Action."

Key takeaways

- Relief operations were mounted rapidly in a new and complex environment. At times, the pressure to deliver came at the expense of applying humanitarian principles. However, it is precisely at the start of a new response that principled framing should occur, to create clarity and precision in terms of objectives, agenda, and strategy, and help set priorities.
- Critically, the humanitarian principles are intended precisely to help navigate highly politicised environments, like Ukraine, and to address access restrictions and complex relationships. This implicates the role of leadership when it comes to applying a principled approach.
- The key criterion in assessing the degree to which a response is principled is not necessarily the "what" organisations do (their "work on the ground"), but whether and how agencies have addressed the principles in setting priorities, taking decisions, managing compromises, and being open on concessions.

3.2. Impartiality and needs in Ukraine

Findings

Looking at the extent to which the response has been underpinned by the principle of impartiality, several findings have emerged. As in other contexts in which the principles have been reviewed,[58] the aspect of non-discrimination, which is one part of impartiality, has been relatively well understood and addressed in this response. Key informants were clear in emphasising that they provided aid in a non-discriminatory manner, not making any distinction based on factors such as ethnicity, race, religion, political belief, etc. Even so, a number of key informants noted initial misgivings among their staff to have internal documents in the two languages (Russian and Ukrainian) or, concerningly, to assist people from Russian ethnic minorities as well. These issues have now largely been resolved, several key informants stressed.

The second component of impartiality—proportionality, or prioritising those most in need—has been more complicated to apply. As seen in other crises,[59] different views exist within the humanitarian community as to whom should be given priority in terms of most in need. Who and where are those most in need? Those who remain close to the frontline? Or is it those who have been evacuated, live in collective centres or elsewhere, but have special needs related to their age, gender, sexual orientation, or physical condition? This review has revealed three particular challenges in deciding on giving priority to particular needs and vulnerabilities: elderly people, the war-wounded, and winterisation.

1. **The elderly (and other special needs).** A significant number of interviewees for this research raised concerns that the humanitarian response in Ukraine is not adequately, and proportionally, targeted towards the elderly. Interviewees from most stakeholder groups—UN, INGO, NNGO, and Ukrainian authorities—explained that the people who tend not to evacuate areas are the elderly, who have deep roots in an area, and/or who may not be physically able to relocate. This creates tensions at the community level, between those suspicious of people who refuse mandatory evacuation, and those wanting to deliver essential services to them. As noted above, the humanitarian community has historically engaged inadequately with the elderly, who in Ukraine form roughly a quarter of the population.[60] An evaluation of WFP, for example, has similarly found that attempts to survey the needs of highly vulnerable elderly citizens were undercut by poorly adapted corporate tools or capacity to respond to the different dietary needs of the elderly.[61] In addition, stressing the importance of a nuanced approach to identifying who is most in need in Ukraine, several key informants argued that the response should also look in greater detail at the specific needs of categories of other at-risk populations, such as persons with disabilities, Roma, and LGBTQ+ individuals.

2. **The wounded.** Assistance for veterans has been noted as a major gap. Surprisingly, a majority of key informants expressed reservations about their organisations' role in assisting war-wounded soldiers and

58 See e.g. Schenkenberg et al., "Lost in Sudanisation? What It Means to Apply a Principled Humanitarian Approach in the Response to the Crisis in Sudan."

59 Schenkenberg and Wendt, *Principled Humanitarian Assistance of EU Partners in Iraq*; Montemurro and Wendt, *Principled Humanitarian Programming in Yemen—a 'Prisoner's Dilemma'?*; Schenkenberg et al., "Lost in Sudanisation? What It Means to Apply a Principled Humanitarian Approach in the Response to the Crisis in Sudan."

60 HelpAge International, "Older People's Experience in Ukraine War."

61 WFP, *Corporate Emergency Evaluation of WFP's Response in Ukraine.*

veterans. While some organisations have dedicated programmes for veterans, and others appear to be willing to devote time and attention to this group, it was also reported that the authorities treat veterans as a specific, exclusive group and do not share information about them, making meaningful engagement extremely difficult. Other organisations, however, explained that their assistance is not intended to support a return to combat. This position stands in direct opposition to the First Geneva Convention of 1949. Grounded in the principle of humanity, armed forces who are wounded or sick and *hors de combat* have exactly the same entitlement to receive medical care as civilians. Under Ukrainian legislation there appears to be a multitude of categories involving veterans. Some organisations noted that they will assist only those who are no longer part of the armed forces, i.e. veterans from a previous conflict who now carry a humanitarian need, or more recently wounded soldiers who have been formally discharged from the army.

3. **Winter protection.** With the response entering its fourth winter, lengthy discussions were held in the course of 2025 in the HCT on the winterisation package regarding what it should contain and who should be prioritised. Although the Ukraine response remains well-funded compared to other humanitarian crises, due to the reductions in funding since early 2025, agencies have been forced to set sharper priorities compared to the first years of the response. This is a marked departure from the general distributions of aid that took place in the first months, if not years, of the response.

The framing of these issues within a principled approach stands in contrast to the early years of the response. In a response largely driven by solidarity and with many new groups delivering relief, considerations of who might be most vulnerable or most in need were less relevant. In the words of a key informant:

> **"There is an issue with newly established organisations and civil society, whose motives go beyond the pure concept of vulnerabilities. It's the solidarity to their own people, and that's a complicated discussion to have, because they don't necessarily see the rationale of a thought that is trying to limit the number of potential beneficiaries." (UN key informant)**

This view was echoed by another key informant who noted:

> **"One thing that sets professional humanitarians apart from, say, neighbourhood groups, is that we apply systems behind how we support vulnerable populations." (INGO key informant)**

In the early phase of the response, **the activation of a so-named "no-regrets" strategy saw rapid coverage and scale prevailing over refined targeting**, thereby limiting the ability to prioritise those most in need. One key informant wondered why efforts had been made to refer to other humanitarian principles while there had been a "no-regrets" policy in place:

> **"When the "no-regrets" policy is invoked to override […] any humanitarian principle, then well, then you don't need the joint operating principles. Then you say, okay, "no-regrets" policy, we do what we can, and we really don't care what the implications are." (UN key informant)**

Stressing the need for better targeting of assistance, one key informant emphasised the view that it is inherent to principled humanitarian action. In their words:

> **"The concept of targeting is an outcome of principled humanitarian action. It's being able to justify why you target Elderly Woman A and not Elderly Woman B, and to stand by these decisions." (INGO key informant)**

Even though it is better funded than most other crises in the world, it is especially the recent global budget cuts that have prompted the response in Ukraine to become stricter in terms of setting priorities. Explaining their approach as a major donor, one donor representative highlighted what they see as the priority:

"Our funding must be used for those people in urgent need of assistance, and they are found in areas close to the frontline." (Donor key informant)

Asked about their views on prioritisation, other donors noted that their funding could also be used for people evacuated to safer areas, but that certain vulnerability criteria, such as age and gender, should be applied. This view would match with those who argue for the special needs of elderly and other potentially vulnerable groups. Some key informants noted that there are people who feel compelled to return to the frontline zones as this is where aid is provided, even though they would be in greater danger. This issue may warrant more attention.

Linked to identifying and prioritising those most in need is the discussion on what constitutes life-saving assistance. For example, while cash assistance was initially a widely preferred modality in the response, the review team also heard about a heated debate between organisations preferring sector-based cash over multi-purpose cash. Overall, cash distributions have been reduced,[62] also because in areas close to the frontline, aid in kind is more relevant since markets are often not working. Moreover, one of the most urgent and widespread needs, now and likely in many years to come, is mental health and psycho-social care. Importantly, in this case, those most in need of psycho-social and mental health care may be young men, often a less prioritised group by humanitarian actors (including donors) when compared to children, girls, and women. As noted, the specific needs of war veterans have not sufficiently been addressed, while these men are likely to struggle with the lasting impacts of their experiences on the battlefield. Cases of domestic and sexual violence have risen significantly.[63] A related issue reported to the team in terms of impartiality is the hesitation to address the needs of men who have decided to live in isolation or hiding to avoid recruitment into the army. Some fear that supporting this group of men would amount to facilitating illegal behaviour. Yet such self-isolation may also result in increases in domestic violence.

The review team also heard from key informants on how the impartial character of the response has also been challenged by the influence from local authorities in some situations. Though generally seen as well-informed about local needs, local responders explained how at the level of some Hromadas, the administrative community level, expectations had been expressed to them on where and to whom they should provide assistance—a point discussed further below, in relation to the principle of independence.

Analysis

Impartiality is not just about who receives assistance, but whether it is specifically adapted and delivered to their needs. In a critical emergency phase with enormous contextual uncertainty, evolving programmatic capacity, coordination structures only semi-functional, and abundant funding, it made sense to adopt the no-regrets approach, as many organisations did. Delivering aid without further delay to all those potentially affected by the war reflects clearly the principle of humanity as well. But as some key informants said, blanket distributions should not become the only modality; nor should it be seen as a justification for simultaneously failing to identify and reach the most urgent cases of distress. The Synthesis Evaluation on the humanitarian crisis in Ukraine found that several agencies were late in refining their approaches.[64] It appears that the sectoral funding cuts have (but not solely) prompted the humanitarian community to be more precise in their targeting. In addition, and importantly, impartiality must be a crucial factor in needs analyses and collective planning and coordination so as to ensure that

62 In 2022, 29.3% of all reported funding was for multi-purpose cash assistance, and in 2023 23.6%. In 2025 only 7.3% of all reported funding was for multipurpose cash assistance. See https://fts.unocha.org/countries/234/summary/2025.

63 UNFPA Ukraine, "Voices from Ukraine Report."

64 Van de Velde and Manili, "Synthesis of Evaluative Evidence on the Humanitarian Crisis in Ukraine." paras. 44-45, 49.

special needs are well covered. It does not mean, however, that all organisations should respond in the same manner to the same priorities. It is precisely on this aspect that diversity within the humanitarian community can become an asset in terms of complementary approaches.

Actors are not impartial because they are humanitarian, rather they are humanitarian (in the formal sense) because they are impartial (among other defining characteristics). Further to this, the notion that all aid responders should be expected to apply impartiality in the same way is not a helpful premise. In terms of understanding and applying the principles, there are differences between international and national/local aid responders; there are differences between UN and the Red Cross (Red Crescent) Movement; there are differences among INGOs and among donors. As found in HERE-Geneva's review of principled humanitarian action in Sudan, the key to a more effective collective approach is not making everyone do the same thing but rather about recognising the added value and specific strengths of each actor and understanding how to achieve complementarity among their different approaches.[65] A starting point is that the principles are a function of action.

65 Schenkenberg et al., "Lost in Sudanisation? What It Means to Apply a Principled Humanitarian Approach in the Response to the Crisis in Sudan," 30.

Key takeaways

- The aspect of non-discrimination, which is one part of the principle of impartiality, has been relatively well understood and addressed in this response. The second component of impartiality—proportionality, or prioritising those most in need—has been more complicated to apply. Challenges in deciding on giving priority to particular needs and vulnerabilities concern particularly elderly people, the war-wounded, and who should benefit from the winterisation assistance.
- In the early phase of the response, the activation of a so-named "no-regrets" strategy saw rapid coverage and scale prevailing over refined targeting, thereby limiting the ability to prioritise those most in need. Delivering aid without further delay to all those potentially affected by the war reflects clearly the principle of humanity. But blanket distributions should not become the only modality; nor should it be seen as a justification for simultaneously failing to identify and reach the most urgent cases of distress.
- Impartiality must be a crucial factor in needs analyses and collective planning and coordination so as to ensure that special needs are well covered. It does not mean, however, that all organisations should respond in the same manner to the same priorities. It is precisely on this aspect that diversity within the humanitarian community can become an asset in terms of complementary approaches.

3.3. Humanitarian access

Findings

One of the most important applications of a principled approach comes in relation to negotiating humanitarian access. A principled approach is expected to create predictability and trust amongst authorities of warring parties that actors following such an approach have no other agendas than assisting those in need. Their humanitarian mission is in and of itself grounds for enabling them to access people in need. Using this as a starting point, the review team developed several findings.

First of all, on the Ukrainian side, humanitarian access is mostly treated as a security matter. Clearly, security incidents involving humanitarian assets and staff place a significant limitation on access, especially as some of the recent fatal incidents appear to have been deliberate attacks. In the words of key informants:

> **"Those villages or settlements that are not accessible, are not accessible because of the possibility of drone attacks from the Russian Federation, or some other security reasons, or the strong presence of military forces that might also be considered as a target from the Russian side." (INGO key informant)**

> **"This national security lens has implications on what we do. And because we work within this system, we are all affected by that [...] Then, of course, in the oblasts, you have now military oblast administrations. This has implications on us, because we do depend on these entities for our operational space, and what we can do and what we cannot." (UN key informant)**

The humanitarian access working group (HAWG) is maintaining a dashboard and has been keeping track of the incidents, their impact, and consequences. One of its main areas of attention is whether armed hostilities, in particular the drone warfare, allow for travelling certain routes and reaching areas close to the frontline, and to what extent aid workers run the risk of becoming a target. One of the two HAWG co-Chairs, INSO, has strong capabilities in Ukraine to provide conflict and security analysis.

However, important as security is in relation to access, there are other access concerns too. Several key informants expressed concern at the failure of achieving negotiated access to the areas occupied by Russian Federation forces. Two reasons were mentioned. First, contacts with the Russian Federation on humanitarian access are minimal. There is a notification system (also known as deconfliction) by which messages providing the details of the movements of humanitarian staff and supplies (on the Ukrainian side) are transmitted to the Russian authorities. These notifications have effectively proven one-directional, with no Russian acknowledgement of their receipt. Some key informants even wondered whether the details provided to the Russians would not create more risk than protection. Secondly, key informants also explained the controversy that has arisen about attempts to deliver humanitarian services in Russian-held areas. The lack of contacts with the Russian Federation has impacted the ability to work in Russian occupied territories.

Although, there is a dearth of reliable data[66] on the needs of the people living in these areas—in addition to the access restrictions, the first independent needs assessment was conducted in 2025—there is the general expectation that the situation must be dire in several of those places. Key informants explained that the elderly, for example, might not be able to access their pensions as they no longer have access to Ukrainian banks, and many elderly lost vital home care and support as family and neighbours fled to safer locations. There has also been a fear that those Ukrainians living under occupation may lose their Ukrainian citizenship.

66 REACH, "REACH HSM: Evolution of Humanitarian Needs in Occupied Areas (July-October 2024)"

Representatives of the Ukrainian authorities with whom the review team exchanged with explained that they would not have any problems with organisations providing assistance in the Russian-controlled areas, as long as it goes solely to people in need. In the words of one:

> **"The only thing that should be raised is the issue of control and accessibility of these organisations on the ground, so that the aid is not used for the purposes of the aggressor […] and so that the aid is not used for military purposes. The population in the occupied territories is the population of Ukraine, people who could not leave, they need the help of international organisations." (Ukrainian local authority key informant)**

And another, representing another Oblast:

> **"The situation depends on the Russian Federation, which does not allow international organisations to work in the territories it controls. […] It doesn't really depend on us; we don't have any influence on the temporarily occupied territories. It will depend more on international cooperation and agreements with the "authorities" of the temporarily occupied territories, which we call the occupiers. That is, it can change exclusively on the agreements of international organisations." (Ukrainian local authority key informant)**

Key informants explained that the attempts to provide humanitarian assistance in the OTs are critical to ensuring a whole-of-Ukraine response. A number of organisations explained how their extensive investments in developing contacts with Russian authorities at various levels had proven fruitless. In late 2023, a group of INGOs launched a humanitarian diplomacy initiative to overcome what are seen as political barriers to enabling a principled, scaled-up response in OTs. In late 2025, an INGO was able to conduct a multi-sector needs assessment, which indicated high assistance and protection needs, specifically in terms of health, food, and water and sanitation. Feedback from local actors, together with more in-depth understanding of comparative areas in non-occupied Ukrainian territory, point to significant and worsening levels of need in OTs.

While the ambition of a number of organisations to work in OTs is understandable and an expression of the principle of humanity ("alleviate suffering where it is found"), it should also be kept in mind that in situations of occupation, international humanitarian law (IHL) provides for the rule that the Occupying Power, in this case the Russian Federation, has the obligation to provide the population with humanitarian services.[67] This legal obligation does not mean that impartial humanitarian organisations have no role to play in OTs. On the contrary, they should be able to freely assess the needs of the population and to respond to gaps should they be found. While several Ukrainian NGOs want to be seen as supporting Ukrainian communities regardless of who controls the territory, others have been hesitant to negotiate access to the OTs as they felt this could be seen as recognising the Russian control. They appeared to accept the status quo of not working in the Russian occupied territories. A national key informant explained, for example, that they did not feel comfortable working in the occupied territories because they feared their work might violate principle of "do no harm". In the words of this representative:

> **"Some partners really wanted to offer us [funding to work in the OTs], but we had to honestly admit to ourselves that this is work […] for which we are not yet expertly prepared, so we will not get involved there, because the main principle is to do no harm" (National/local key informant)**

The extent to which unimpeded impartial humanitarian access, especially in the OTs, will be secured in a potential political settlement was raised by a few key informants. Asked for their forecasts for the future of the response, several key informants explained that they had engaged in, at least, some contingency and scenario planning, but few had thought about how a strengthened principled approach could help them in achieving better access.

67 The Fourth Geneva Convention covering the protection of civilians in international armed conflict stipulates the clear obligation for an Occupying Power to ensure that the basic needs of the population under its control are fulfilled. See Art. 55-1, Geneva Convention IV, 1949.

Developing further coordinated advocacy on ensuring unimpeded access to OTs would be very timely given the ongoing political developments in reaching some kind of peace agreement.

Analysis

In situations of armed conflict access negotiations usually take place with the parties to the conflict. In the context of Ukraine, there is a lack of such negotiations. Access is either discussed as a security matter, takes the form of notifications, or is framed as a matter of assisting populations in OTs. All these aspects have their merit, but what seems to be missing is an overall, strategic effort to engage in a humanitarian dialogue that covers unimpeded humanitarian access with the two parties to the conflict, by those higher up the chain.

The lack of dialogue is not only concerning from a practical perspective, but also from the point of view of principled humanitarian action and international humanitarian law. IHL cannot exist solely on paper. In fact, the four 1949 Geneva Conventions are built on the premise that the High Contracting Parties—legal language for state parties—engage with the parties to the conflict on matters related to the conduct of war and respect for the protection of civilians. As far as this review could establish, there has been little to no mutual engagement on operational humanitarian issues, with a few exceptions. One of these exceptions is the repatriation of human remains of fallen soldiers between Russia and Ukraine, and another one is the repatriation of formerly abducted children who were transferred by Russia to Ukrainian occupied territories or cities such as Moscow.[68] Earlier, in 2022, the Black Sea grain initiative could also be seen as part of a humanitarian dialogue with Russia. However, few, if any, impartial humanitarian agencies, have been able to obtain permissions to cross the contact line.

Several key informants also expressed the view that Russia's permanent membership of the UN Security Council should create a lever for access negotiations. At least, it would allow for (discrete) engagement with the Russian Federation. As for the UN's engagement with Russia, the review team understands that in regard to access negotiations, the role of the HC for Ukraine is to focus on the relationship with the Ukrainian authorities. Contacts with the Russian Federation are covered by the UN offices in New York City and Geneva.

Furthermore, aside from the issue of whether or not the delivery of impartial humanitarian assistance in occupied territories should be considered as a feasible option, few key informants seemed to be aware of the relevant rules of IHL. In fact, the review team is left with the impression that IHL knowledge among aid workers in Ukraine is extremely low. As with the principles, references to the law are frequently made, but the complexity of IHL is not well-understood. Asked if there had been training efforts on IHL, some key informants noted an initiative undertaken by Geneva Call to deliver training, but most key informants were unaware of any IHL training provided. The lack of IHL familiarity also emerged in the use of specific terminology for this context.

In the early years of war in Eastern Ukraine, humanitarian documents, including those from the UN referred to "non-government-controlled areas" (NGCAs) for parts of Ukraine under the control of Russia-backed authorities. It is a term that the Government of Ukraine initially insisted on, but IHL does not include such terminology.[69] When the Russian Armed Forces take control over an area, it becomes occupied territory. And, to be clear, the Russian Federation has a government.[70]

68 See, for example, the repatriation of human remains (ICRC News Release, 17 June 2025) and vulnerable civilians (ICRC Article, March 2025). https://www.icrc.org/en/news-release/russia-ukraine-icrc-supports-large-scale-repatriation-human-remains; https://www.icrc.org/en/article/russia-icrcs-response-emergency-situation-kursk-linked-hostilities.

69 Van de Velde and Manili, "Synthesis of Evaluative Evidence on the Humanitarian Crisis in Ukraine," para 152.

70 As an alternative certain actors use the term "temporarily occupied territories" (TOTs).

Key takeaways

- In situations of armed conflict, access negotiations usually take place with the parties to the conflict. In the context of Ukraine, there is a lack of such negotiations. Access is either discussed as a security matter, takes the form of notifications, or is framed as a matter of assisting populations in OTs. All these aspects have their merit, but what seems to be missing is an overall, strategic effort to engage in a humanitarian dialogue that covers unimpeded humanitarian access with the two parties to the conflict, by those higher up the chain.
- The lack of dialogue is not only concerning from a practical perspective, but also from the point of view of principled humanitarian action and international humanitarian law. Aside from the issue of whether or not the delivery of impartial humanitarian assistance in occupied territories should be considered as a feasible option, few key informants seemed to be aware of the relevant rules of IHL.

3.4. Neutrality and local actors: an evolving landscape

Findings

The principle of neutrality remains notably at the forefront of the minds of an overwhelming majority of key informants for this review. A number of them expressed that this principle does not have a place in their work, while others stressed that it remains highly relevant for them. Especially, but not only, for national aid/crisis responders, **the dilemma is rather stark and, for some, absurd: how to be neutral when being bombed daily by an aggressive occupier** of their homeland. Key informants from national and local organisations explained that their humanitarian work, which seeks to support the resilience of the Ukrainian population, is in and of itself seen as not neutral. As they put it, their work is in direct opposition to the (military) objective of the Russian Federation, which is to weaken this resilience by attacking civilians and civilian infrastructure. One key informant confirmed that Russian forces have shown little respect for international (humanitarian) law, as their organisation witnessed many attacks on facilities such as hospitals, humanitarian transports, and staff engaged in humanitarian activities. He noted,

> **"When we provided medical assistance in hospitals, we saw bombardments of the emergency units of these hospitals, the next day." (INGO key informant)**

This position illustrates how complicated the application of the principle of neutrality is. Indeed, from the very beginning of the invasion, the space for humanitarian action based on this principle was challenged. First, a coalition of Ukrainian civil society organisations called it into question. In a joint open letter in August 2022, these organisations explicitly stated: "We do not want to remain neutral."[71] They firmly asserted that

> **"It should be up to local civil society, in these circumstances, to determine its own approaches and priorities."[72]**

71 National Network of Local Philanthropy Development, "An Open Letter to International Donors and NGOs Who Want to Genuinely Help Ukraine—GFCF."

72 Ibid.

Indeed, several also argued that they should define and articulate their own principles, noting that neutrality in particular is often neither realistic nor meaningful for them, as they are embedded in affected communities. As one noted:

> **"During the full-scale invasion, how do you tell the people that you're a neutral actor? It's a very difficult question. How do you explain your mandate to the people that just live through suffering, and all of a sudden you say 'we are a neutral organisation in Ukraine'" (National/local key informant)**

Resistance to Russia has led various aid actors, especially but not only national ones, to prioritise solidarity and this solidarity is fundamental to their positioning, programming, and (domestic) fundraising.[73] As a Ukrainian key informant explained,

> **"Ukrainians find it difficult to understand the issue of neutrality. You want to help everyone, but it turns out that if you are a humanitarian organisation, you cannot help everyone (including the military)." (National/local key informant)**

Some key informants also noted that a clear delineation between aid to civilians and militaries may create a sense of disengagement or lack of solidarity between the organisations and the community. One key informant explained:

> **"We are here because it's a nation that's been invaded and is defending itself. We try to do multiple projects in each location over time, building trust with the local authorities, which is important in terms of solidarity and Ukraine's recovery." (INGO key informant)**

Key informants from local organisations also pointed to the expectations from their staff and volunteers. Many of them have connections with family or friends who are engaged in combat efforts or have had relatives killed in the war. Their constituencies (including their individual donors), partners, and networks expect them not to be neutral, they explained. Also, Ukrainian philanthropy, which has taken an important role in mobilising resources, frequently also supports both humanitarian and military efforts.

A number of Ukrainian CSOs have taken on humanitarian roles out of necessity. As one key informant explained:

> **"They [the Ukrainian NGOs] wanted to assist not only civilians but also the army. I know some organisations who actually dropped their military direction and focused on civilians in order to have access to funding, because it was a mandatory requirement." (National/local key informant)**

The obligation to fit with the international criteria for funding means that national and local NGOs are expected to subscribe to neutrality. The Ukraine Humanitarian Fund, for example, continues to include neutrality in its eligibility criteria. Some local organisations noted that if they did not subscribe to neutrality, even if they did not believe in it, they were being prevented from receiving international financial resources. This view is also reflected by an analyst who has experience in working with the Ukraine Pooled Fund. She notes:

> **"Why did international donors refuse to support a hospital, an educational project or a rehabilitation program, just because the same organisation once publicly announced a fundraiser to help the military? In Ukrainian realities, these organisations are inseparable from their communities, their direct beneficiaries, and therefore from the military that defends these communities."[74]**

However, the review team also heard from a number of local organisations that they had no hesitation signing up to the UHF's criteria. In fact, these Ukrainian NGOs expressed that they are keen to be seen as respected humanitarian actors. Not signing up would somehow make them feel inferior compared to their international counterparts. As a representative from a local NGO noted:

> **"We have accepted the principles as a requirement of the sector, as a standard. If we want to belong to the general [humanitarian] community, we must adhere to them." (National/local key informant)**

Compared to national and local actors, applying the principle of neutrality might be less challenging for international humanitarian

73 Some have juxtaposed neutrality with solidarity. See also Humanitarian Outcomes, "Enabling the Local Response: Emerging Humanitarian Priorities in Ukraine, March–May 2022.

74 Ivanchuk, "To Be Effective or Neutral? The Ukrainian Context in International Humanitarian Law."

organisations, but it is not straightforward, which is also due to the way the humanitarian response was set up. As one key informant noted:

> **"It's interesting to think that in the very beginning, when setting up the first offices and renting the first premises in 2022, we would get discounts from realtors because, according to them, we were 'part of the resistance'." (UN key informant)**

Furthermore, as explained in the context section, the controversy that arose after the photographed handshake between the Foreign Affairs Minister of the Russian Federation and the ICRC President, created a resentment towards ICRC. Ukrainians expect the agencies to be on their side. One key informant explained this as follows:

> **"I do think that operating in Ukraine as a humanitarian organisation, in a country that has been attacked by a neighbouring country under a violation of the UN Charter, it is extremely difficult to be neutral. We work within the state structure, we work in areas directly impacted by these violations of international humanitarian law." (UN key informant)**

This expectation that international humanitarian organisations are on the side of the country is still present. The most striking example the review team was made aware of is an expectation from Ukrainian authorities that one organisation involved in demining is expected to hand over anti-tank mines to the Ukrainian military instead of destroying those mines.

A key issue when it comes to neutrality is also taking a public position. The review team heard of an example of an organisation that was contacted by Ukrainian authorities as their statement to condemn an attack that killed two members of staff did not refer to those behind the attack, the Russian forces. The authorities asked the organisation to make a second statement and to include a reference to Russia. The organisation went along with the request, also because Russia had officially claimed responsibility for the attack. More generally, condemning attacks on humanitarians, the HC in Ukraine has not hesitated to point fingers at Russia.[75] Indeed, the question that comes up is whether calling out a UN Member State, in this case a permanent UN Security Council Member, for their violations of international law means not being strictly neutral. This naming and shaming is a source of some debate among humanitarians. Some organisations are keen to resort to more traditional ways to explain their application of the principle of neutrality. As one key informant put it:

> **"We are never neutral in terms of the people we serve. We always take the side of those who are violated by a conflict, by a genocide, whatever." (International humanitarian organisation key informant)**

As for the idea that the aid effort is driven by solidarity, several key informants explained that for them solidarity is an inherent part of the principle of humanity, not a stand-alone principle. One key informant drew a direct connection with the principle of humanity:

> **"There is this general solidarity around the principle of humanity." (INGO key informant)**

Analysis

To say that the situation in Ukraine has challenged the sector's thinking on neutrality would underplay the controversy on the principle. A number of (local) actors providing relief on the frontline have made it clear that they do not want to remain neutral in their efforts. They feel that the value of human life must come first and are engaged in supporting the needs of those on the frontline, civilians and combatants. Other organisations, national and international, are more cautious and are keen to be perceived as neutral, but find this challenging given the highly political nature of the response and the expectation to be in solidarity with Ukraine.

75 OCHA, "Aid Workers Who Devote Their Lives to Helping People in Need Must Be Protected."

In the context of Ukraine, the debate on neutrality has taken on renewed importance. In fact, **neutrality has almost become shorthand for the principles per se**.

It should be recalled, however, that while the principles of humanity and impartiality are grounded in what are arguably universal humanitarian values, neutrality and independence have grown out of operational necessity to help fulfil humanity and impartiality.[76] The focus on the principle of neutrality in the Ukraine context appears to have come at the expense of taking a broader look at the principles, and it has also detracted from the more operational role neutrality should play, ultimately in support of being able to operationalise humanity and impartiality.

The debate on why neutrality has been part of the four core humanitarian principles and how it fits with active humanitarian engagement is far from new. In the early 1990s, Oxfam, for example, argued against adding neutrality to the 1994 Code of Conduct for the International Red Cross and Red Crescent Movement and NGOs in disaster relief because of its commitment to solidarity and activism.[77] In many other instances since, the moral obligation of humanitarian organisations to raise their voices in view of the significant human rights violations or breaches of IHL with which they are confronted in the course of their work has been put against a strict or a (too) narrow interpretation of neutrality. Clearly, governments that are called out by humanitarian organisations for their violations of international law, likely view those organisations as non-neutral. In this way, neutrality is used as a command to those organisations to stay silent about a government's policies and practices, no matter how anti-humanitarian these are.[78] The moral and ethical duty of humanitarians, however, suggests a different approach: do not let neutrality turn into humanity.[79]

On a practical level, especially because of the agenda of the localisation of (humanitarian) aid, the question comes up as to whether donors and international agencies should expect national and local organisations to be neutral. The solidarity of an aid organisation or group—and not necessarily individual staff members—with a political or military cause calls into question its positioning. Mainstream thinking in the sector is that it makes them part of one and the same political effort, which fosters mistrust.[80] However, that holds very different ramifications for a small actor working in a micro-context compared to a major agency working at the national or even international level.

It follows that **there is a need for a more differentiated approach in understanding who is expected to apply what principles**. It should be up to local civil society in these circumstances to determine what approach they want to follow and whether they want to be part of a (traditional) humanitarian response. Instead of having opened a frank dialogue on this issue, it is surprising that this issue has hardly received attention from coordination bodies in Ukraine, nor globally. On the contrary, there is still a one-size fits all approach.

76 Jean Pictet, *Commentary on the Fundamental Principles of the Red Cross*.; Labbé and Daudin, "Applying the Humanitarian Principles: Reflecting on the Experience of the International Committee of the Red Cross"; DuBois, *HERE Humanitarian Priorities—Principles Meeting Report*.

77 Sharpe, "It's All Relative."

78 See, e.g. the statement from the Director of Communications of MSF Canada Aanjalie Roane, "Shut up and provide aid: why weaponizing neutrality against humanitarian organizations must not silence us." 24 July 2024. https://www.doctorswithoutborders.ca/shut-up-and-provide-aid-why-weaponizing-neutrality-against-humanitarian-organizations-must-not-silence-us/

79 Healy, "Neutrality."

80 For example, what might positioning in Ukraine mean when encountering the Russia-affiliated Wagner Group in Mali or CAR? On the broader point, see Hargrave et al., *Narratives and the Ukraine Response: Implications for Humanitarian Action and Principles*.

This is also evidenced by the way in which local (humanitarian) actors are assessed in terms of their eligibility for international funding. What has happened is that the four principles have become part of a long list of eligibility criteria, many of which are of an entirely different nature as they cover issues such as financial accounting and all sorts of administrative requirements. Procurement practices of INGOs and UN agencies have often made the application of the principles part of their administrative checks in developing contractual arrangements.

Understandably, in a country where corruption is a significant issue, due diligence assessments are important, but there should be different approaches to verifying if organisations have the necessary administrative arrangements in place and to what extent they are value-driven and committed to all the humanitarian principles. To a question from a donor or international organisation, "are you humanitarian", few organisations in need of funding would be prepared or inclined to say "no". A procurement and/or administrative approach contradicts the nature of applying the principles, which requires dialogue and engagement rather than a regulatory administrative check grounded in (a suggestion of) compliance.

Key takeaways

- The focus on the principle of neutrality in the Ukraine context appears to have come at the expense of taking a broader look at the principles, and it has also detracted from the more operational role neutrality should play, ultimately in support of applying humanity and impartiality.
- There is a need for a more differentiated approach in understanding who is expected to apply what principles. It should be up to local civil society in these circumstances to determine what approach they want to follow, and whether they want to be part of a (traditional) humanitarian response. Openness and a frank dialogue are needed rather than a one-size fits all approach.
- Procurement and contracting practices of UN agencies and INGOs have often made the application of the principles part of their administrative checks and due diligence assessments. Such assessments are important, but there should be different approaches to verifying if organisations have the necessary administrative and financial accounting arrangements in place and to what extent they are value-driven and committed to all the humanitarian principles. A procurement and/or administrative approach contradicts the nature of applying the principles, which requires dialogue and engagement rather than a regulatory administrative check grounded in (a suggestion of) compliance.

3.5. Distinction from other actors and forms of aid, and partnerships

Findings

As the principles help to define the identity and agenda of humanitarian actors, it is important that they are recognised and distinguished as such. In the course of the research, the review team heard of several examples of how the distinction between humanitarian and other actors risks becoming blurred and the relevance of maintaining the principle of independence.

As for blurring the lines, there is a heated debate among responders on the use of devices that jam the drone signals. A number of recent (fatal) incidents appear to have been deliberate attacks involving first-person view (FPV) drones. These drones, which are equipped with cameras, allow their operators to select specific targets, including those staff and transports with an exclusive humanitarian mission. It is especially local organisations and their staff that work in the frontline areas and who run the risk of being attacked by these drones. To address these risks, local NGOs have been highly vocal on the duty of care. A number of local organisations maintain that drone jamming equipment should be part of the duty of care package. Some also noted that such equipment was required by Ukrainian Armed Forces checkpoints to access certain areas. And several saw the use of the equipment as justified when it would enable them to reach an increased number of people in a particular area.

Other key informants were concerned, however, about the principle of do no harm: diverting the course of the drones might cause avoidable damage to civilians in unforeseen places. Another consideration they highlighted is how this might escalate, with humanitarians becoming involved in an arms race as the technology evolves rapidly.

In further discussions with humanitarian leaders, the view was expressed that the use of drone jamming devices should be a last resort measure to access otherwise inaccessible areas of critical need. Before arriving at this option as last resort, it was noted that leaders have a (moral) obligation to provide alternative options for securing humanitarian access, such as negotiating humanitarian corridors and increasing efforts to make the humanitarian notifications system more effective.

Similar to the drone jamming equipment, there are also issues in terms of a lack of distinction related to the clothing and vehicles used by groups working close to the frontline. The dress code of volunteers undertaking evacuations of people who did not yet leave their residences does not differ much from the military. The review team also heard of local organisations traveling together with armed convoys.

On a different level, the review team also heard from local NGOs about their international partnerships and how the principles, especially independence, did or did not play a role in framing the partnership. A local NGO representative, for example, pointed at the crucial balance between partnership requirements and their independence. Similarly, an INGO representative explained that it had taken their organisation extensive effort to agree on values and principles and their practical translation with (prospective) local partners in relation to their respective expectations.

The review team also heard from Ukrainian key informants that they had decided to split their organisations, as an alternative solution to combining different types of aid. As one explained:

> **"In Ukraine, the system of registering an organisation is not so hard. That's why some will have two legal entities. One organisation will fully work only on humanitarian response, and the other one will be working only with community needs, which can be different." (National/local key informant)**

Analysis

The use of the drone jamming devices is a hot topic among the humanitarian community in Ukraine. The suggestion that it is a measure of last resort allows for comparison with the use of armed escorts by humanitarian organisations, a practice dating to the early 1990s in Somalia. As noted, it is also maintained that the use of such devices would be permissible if more lives could be saved, an interpretation of the overriding character of the principle of humanity, framed as the humanitarian imperative. In assessing the issue, first of all, **there can be little doubt that local NGOs and volunteers should expect to benefit from the same security standards as their international counterparts**. The work done by the CSO alliance and NGO platform to convince international donors to make funding available for duty of care measures for local NGOs has paid off.[81] This step to support local organisations with financial means to ensure care for their staff also fits with the agenda to localise aid. But with this recognition, the duty of care debate did not end. Discussions as to what protective equipment should be used (and funded) further evolved and focused especially on the drone jammers.

A legal analysis reviewing the compatibility of a drone jamming device with the humanitarian mission is clear: under IHL, the use of drone jamming equipment would mean interfering with military objectives of parties to the conflict, which means the organisation would lose its protected humanitarian status.[82] From an IHL perspective, humanitarian workers may be seen as combatants given their direct involvement in the hostilities, and so the organisation will lose its humanitarian character and the legal protection afforded by it. The review team was surprised that the legal analysis had not yet been shared more widely. The review team also heard about conversations within and among donors as to whether their funding could be used to procure the drone jamming devices. At least one donor government is considering cancelling some contracts if their partners (continue to) do so.

This potential step illustrates how important it is to ensure that partnerships are underpinned by shared views on values and principles. The experience of the representative of the INGO that invested time and effort in trying to find modalities that are agreeable to the international and local partner seems to be more the exception than the rule. This review sees three key problems in relation to incorporating the principles in partnership agreements with local organisations. First, it pushes these organisations to sign up to benefit from international funding, but their values may not entirely correspond to all four principles, especially neutrality. The key question whether the principles, especially neutrality, should be adapted to the role and work of local NGOs is one that needs to be addressed locally, as also raised in an earlier study,[83] and at the global level, for example, by the pooled fund working group (PFWG). Second, international contracts, including those imposed by a number of INGOs or mechanisms such as pooled funds, approach accounting requirements and humanitarian principles in the same way, while these issues are of a fundamental different character. Due diligence assessments are to understand whether the necessary administrative and financial control procedures are in place. Coming to a shared understanding of what it means to deliver humanitarian response is a process of an entirely different nature, one that requires dialogue and mutual understanding. These two issues have received little attention in the global debates on the localisation of aid agenda and efficiency: it is high time that a platform such as the Grand Bargain considers it. Finally, this approach to contracting foregrounds and reinforces a regulatory or compliance-based approach to principled action.

81 The Platform, "'Duty of Care' Package for Local Humanitarian Responders in Ukraine."

82 "Non-paper" shared confidentially with the review team.

83 People in Need, "Neutrality in the Humanitarian Response in Ukraine," 14.

To illustrate further how the dialogue on humanitarian principles is overlooked in partnerships, a recent assessment of the (quality of) partnerships of NGOs receiving German (public) funding with local Ukrainian partners hardly even covers the issue.[84] An additional and complicating factor is that the list of commitments and policies has only become longer in the humanitarian sector the last twenty years without further guidance as to how these commitments and policies should be prioritised.[85]

84 CMC, *Independent Evaluation of the Aktion Deutschland Hilft (ADH) Joint Appeal on Ukraine*.

85 For example, practices from donors and organisations have evolved in a way that suggest that policies on the prevention of sexual abuse and exploitation (PSEA), localisation, or nexus come before agencies' commitments to humanitarian principles or protection.

What these experiences suggest is that much greater attention should be given to the understanding and views of local organisations on humanitarian response in relation to their work. Yet in a sector that remains rife with sub-contracting arrangements and driven by efficiency considerations, it is likely that this practice of deep engagement on values and principles between an international and local partner to find mutually agreed arrangements, unfortunately, remains more the exception than the rule.

Key takeaways

- As the principles help to define the identity and agenda of humanitarian actors, it is important that they are recognised and distinguished as such. In the course of the research, the review team heard of several examples of how the distinction between humanitarian and other actors risks becoming blurred and the relevance of maintaining the principle of independence, including notably e.g. the use of drone jamming equipment, military clothing, and vehicles.
- It is very important to ensure that partnerships are underpinned by shared views on values and principles. Much greater attention should be given to the understanding and views of local organisations on humanitarian response in relation to their work.

3.6. The engagement of humanitarian donors

Findings

With political stakes being high, so is the interest and engagement of many donor governments in Ukraine. Ukraine is in the top three of countries that received the most humanitarian funding in recent years. With the approval of their parliaments, several donor countries have established special budget lines for Ukraine, in addition to their normal humanitarian and development budgets. A number of these donors have also frequently added top-ups to the

funds they allocated for Ukraine. Anecdotally, we asked key informants how they rated their organisation's independence from donors on a scale of one to ten. Interestingly, scores given by those we asked ranged from very low (one or two) to very high (ten) resulting in an average of around six. Commenting on donors' practices in Ukraine, several key informants noted a flexibility that they had not seen elsewhere. As one agency representative put it:

> **"The donor scrutiny has been a lot less than in other contexts, which is surprising given the huge resources that have come into Ukraine. I came from Sudan, where you felt donors were breathing down your neck. Here, they really have a hands-off approach." (UN key informant)**

As for donor engagement with this review, several representatives explained that they are keen to understand the implications of the recent reductions of funding and what the revised list of humanitarian priorities would look like in Ukraine. Others explained that they are particularly interested in the localisation of aid agenda and how localisation has taken shape in Ukraine. Several donor representatives noted that their teams that cover humanitarian and development are well-staffed in Ukraine when compared to other large-scale humanitarian crises. Most donors interviewed for this review also explained that their financial support could be used for activities in OTs, should the organisations request so. It appears that **there is space and a need for a deeper exchange with donors on what further humanitarian action in the OTs would or could look like**.

In general, for most if not all donor governments, their financial support for the humanitarian response is one of several ways in which they are engaged in Ukraine. They are governments, and member states of political bodies such as the EU, the North Atlantic Treaty Organisation (NATO), and the UN. European States, the EU, and a range of other Western States have lumped their humanitarian and development assistance and military support together as one package with one and the same goal: "we stand by the side of the Ukraine."[86] EU institutions and many governments statements from international donors refer to "emergency support" to frontline communities.[87]

The review team saw that few NGOs in Ukraine seem to be concerned by the visibility requirements of donors. Some of them said that EU, UK, and similar logos or flags give Ukrainian communities the feeling that they are reliable organisations and the communities in this way notice the solidarity from the institutions and countries that provide funding. It did not appear to them that wearing the Western donors' logos would give the Russians an extra argument to see them as targets. As noted earlier, humanitarian aid is seen as directly in opposition to the Russian war effort. Some organisations noted that they had reached exceptions ("carve-outs") in their negotiations with donors and, as a result, were free not to use the logos in frontline zones. This suggests an artificial solution, as if the Russians are unable to see them carrying these emblems beyond the immediate frontline.

Analysis

The instrumentalisation of humanitarian aid for political purposes by governments has been a reality for many years. It is the main challenge to the principle of independence. From a principled perspective, the issue is the extent to which organisations are concerned about being instrumentalised. **Too many compromises that favour political agendas ultimately undermine recognition of the value of principled humanitarian action** and acceptance by all the parties to a conflict, a cost magnified by the

86 See e.g., German Federal Foreign Office, "Germany Stands Firmly by the Side of the People in Ukraine"; European Council, "Press Release Ukraine 23 October 2025."

87 See e.g. https://www.linkedin.com/posts/foreign-commonwealth-and-development-office_the-uk-will-be-by-ukraines-side-for-generations-ugcPost-7372359756742823936-x-5O?utm_source=share&utm_medium=member_desktop&rcm=ACoAAABGpDABDbYoK1Ukp2arBIuCgiNVXQKyC7w.

visibility and sheer size of the intervention in Ukraine. Donors are also primarily governments, which means that they are political actors. The fact that Ukraine is relatively well-funded compared to other crises is not a coincidence.

The combination of political and humanitarian support has implications for humanitarian organisations that are keen to stress their independence and neutrality. Even more so, it may impact the safety of humanitarian workers. Are institutional donors aware that their requirements for visibility, such as the prominent display of their flags and logos on humanitarian transports or outfits, may put humanitarian organisations at risk? The issue in question is the extent to which they make an effort to separate their various forms of support to Ukraine. Granted, there is no such thing as non-political humanitarian aid from donor governments, but this does not preclude a dialogue on the extent to which there should be a humanitarian carve-out to ensure a better separation between humanitarian and other forms of assistance in Ukraine.

One place for such a dialogue could be the HCT. Ukraine is one of the countries where donors participate in HCT meetings as observers. The active participation of HCT members and observers in the November 2025 HCT workshop, held as part of the review, demonstrated a keen interest in discussions on principled issues. It is felt that HCT conversations too often concentrate on numbers and funds in relation to the HNRP or the winterisation plan. As one HCT participant noted, we hardly take a moment to take a step back and to reflect on our roles and work in relation to the principles.

Moreover, while governments are likely focused on the progress in the peace negotiations, in their capacity as donors, they should also promote, if not facilitate, a (separate) humanitarian dialogue with the two parties to the conflict. Such a dialogue is also crucial with an eye to the future. Whenever a peace agreement may become a reality, and hostilities end, there will be an immediate need for further humanitarian engagement on all sides of the frontline.

Key takeaways

- Too many compromises that favour political agendas ultimately undermine recognition of the value of principled humanitarian action and acceptance by all the parties to a conflict, a cost magnified by the visibility and sheer size of the intervention in Ukraine.
- Donors are also primarily governments, which means that they are political actors. The fact that Ukraine is relatively well-funded compared to other crises is not a coincidence.
- The combination of political and humanitarian support has implications for humanitarian organisations that are keen to stress their independence and neutrality. Even more so, it may impact the safety of humanitarian workers. There is no such thing as non-political humanitarian aid from donor governments, but this does not preclude a dialogue on the extent to which there should be a humanitarian carve-out to ensure a better separation between humanitarian and other forms of assistance in Ukraine.

4. Conclusion and recommendations

The story of the humanitarian principles in the response to this war is an inconsistent one, spanning from intense debate on the meaning of neutrality to their context-specific operationalisation having been ignored or taken for granted. This review highlights the critical importance of applying and operationalising the four humanitarian principles of humanity, impartiality, neutrality and independence amid a complex, politicised, and highly challenging environment. Now four years into the full-scale international armed conflict, **the humanitarian response in Ukraine calls for a regular joint and honest discussion by all stakeholders on the challenges of delivering a principled response**.

Initially, the principles were insufficiently reflected in humanitarian organisations' work. Applying the principle of humanity is not just a matter of blanket distributions, it needs to be combined with an approach that shows that the other three principles have been given consideration (i.e. applied) as well. True, the context has been challenging, but Ukraine presented precisely the sort of situation for which the principles were designed.

The strong value of solidarity with the Ukrainian communities places even more importance on explaining what humanitarian organisations can and cannot do. This has also been a learning experience for Ukrainian NGOs and civil society. It is entirely understandable for a number of them to be activist and to follow their principles, instead of being squeezed into what they might see as the straitjacket of an international humanitarian framework that demands adherence to externally defined principles such as neutrality and independence. Those who form this international humanitarian community should be prepared to invest in their relations with Ukrainian organisations, which includes a dialogue on values and principles. A principled approach cannot be assessed through due diligence exercises.

Likewise, a principled approach also demands consistent inter-agency dialogue rather than vague endorsements of the principles, and openness in terms of the complexity of certain decisions. Settling for reasonable compromises and sharing these decisions is not a weakness, but a crucial reflection of the principles having been taken into account. Partnership approaches should include meaningful dialogue on how to deliver principled action in practice. Not all actors should be required to think about applying the four principles in the same way.

The entire humanitarian response is critically lopsided. Negotiations have mostly been focused on engaging with one party to the conflict, and the distribution of aid follows this flawed suit. It has resulted in a situation in which humanitarian access is reduced to a matter of avoiding incidents, instead of an engagement that seeks to prevent attacks on humanitarian staff or transports and gain access to people in crisis. Efforts should be launched to engage in a structured humanitarian dialogue with the parties to the conflict.

Although many of these issues have emerged in the first four years of the response, addressing them remains vital for guiding effective and principled delivery of humanitarian services in the future, not only in the high-profile war in Ukraine, but globally. Ultimately, a principled approach is fundamental to upholding the integrity and legitimacy of humanitarian action both within Ukraine and throughout the world.

Recommendations

Coordination

1. **Humanitarian coordination platforms, such as the HCT, should employ the humanitarian principles as the framework for their consultations,** whether these are general coordination discussions, or specifically devoted to principled issues, such as access. For example, discussions on prioritising those most in need are about impartiality, especially proportionality; and reaching them will rely upon neutrality and independence. This discussion requires operational actors to be more honest about their unique role in the response. Further to framing operational coordination within humanitarian principles, the HCT and other coordination platforms should hold regular in-depth consultations (e.g. at least quarterly) on the application of humanitarian principles, such as those that took place during the HCT workshop in November 2025. Where interagency documents, such as HNRPs, speak of principled humanitarian action, they should provide explanations as to what is meant in the Ukraine context; what issues must be navigated as a matter of principle, and require a balanced decision. Organisations such as the Centre on the Competence of Humanitarian Negotiations stand ready to assist operational actors in these discussions.

2. **The HCT should undertake a periodic review of the use of the JOP through a principled lens.** The JOP should be expanded to include guidance on operationalising each of the four principles in Ukraine: defining their implementation, setting out red lines, and creating a framework for deliberating these issues. Specific attention should be paid to current issues such as the colours of vehicles and outfits, and the use of devices that detect drones. Devices that jam GSM signals of the drones should not be used by humanitarian organisations seeking to deliver a principled response. The legal analysis that the review team received should be widely distributed. For those actors providing relief and carrying out evacuations on frontlines, the humanitarian leadership should provide alternative options that help them to carry out their work in relative safety.

Operational

3. **There should be concerted mutual learning efforts involving staff** of UN agencies, the International Committee of the Red Cross (and Red Crescent), INGOs, NGOs, local CSOs and volunteer networks to address the low levels of knowledge on IHL and to ensure that staff are up to date on what it means to apply a principled approach generally, and in this particular context. National and sub-national authorities and diplomatic staff in Kyiv should also be participants in such workshops.

4. **Partnerships between international and Ukrainian organisations should involve dialogue on what it means to deliver a principled approach.** Requiring local organisations to subscribe to the four principles solely as part of an administrative and due diligence check in developing contractual and funding arrangements renders the principles meaningless. This issue should also be discussed by working groups tasked at the global level with improving the international—national interface, such as the Grand Bargain and pooled fund working group.

Policy

5. **Member states and high-level UN leadership should engage in a dialogue with both parties to the conflict and end the asymmetry in humanitarian negotiations**. High-level efforts involving UN institutions and member states should be launched to ensure that humanitarian considerations, including unimpeded access, are part of any political settlement to the conflict. Russia's permanent membership of the UN Security Council is an opportunity to allow for discrete engagement at the New York level. These diplomatic consultations and negotiations on a peace settlement or truce should also be devoted to strengthening respect for IHL.

6. **Donors and humanitarian organisations should engage in a dialogue**, such as the meetings of the Senior Officials Meeting (SOM), that discusses the extent to which governments and EU institutions can support principled humanitarian action by avoiding blurred lines between the various forms of aid and support to Ukraine. There should be a better separation between humanitarian and other forms of assistance in Ukraine.

Annex 1—Analytical framework

Humanity	
Needs-based assistance and protection	The principle of humanity is often only translated in terms of providing assistance. We see applying a protection lens as equally important. It follows that trade-offs and synergies, such as between presence/access and advocacy on humanitarian norms, will be examined in-depth, both with regard to each organisation and to larger coordination efforts on this point.
Efforts to negotiate access and presence	Do agencies have red lines on conditions for acceptance? Do they have policies or take position on when compromises are no longer appropriate? With whom do they negotiate? How do they navigate the variety in access constraints (Ukrainian-controlled or occupied territories)?
Engagement with affected communities	Do agencies involve affected communities on questions around difficult choices, such as what compromises to accept or on the tension between assistance and protection?
Impartiality	
People most in need	Do agencies have definitions of 'most' in need? And do they coordinate on this question? Do they balance impartiality with other values such as scale, impact, or value-for-money? How have agencies dealt with the limitations/blockage of working in OTs, given reports of very high needs?
Non-discrimination	How absolutely do agencies interpret this principle? Do they understand or see legitimate forms of discrimination in their work, such as prioritising women, the elderly, people with disabilities, IDPs or refugees? How do they navigate potential challenges in reaching LGBTQI and Roma communities and men of conscription age?
Neutrality	
Political engagement	What is the relevance of the principle of neutrality in an armed conflict that does not respect of the rules on the use of armed force under international law? Do humanitarian agencies distinguish between military/political and humanitarian neutrality? Do their activities, including for example advocacy or humanitarian demining, imply an actual engagement in controversies of a political or related nature? How do humanitarian agencies consider the sources of their funding and the destination of their assistance in light of neutrality or efforts to work on all sides of a conflict to the extent possible? And how do they consider their partnerships with local civil society in this regard? What are the challenges for national CSOs that do not wish to remain neutral?

Perceptions	Have the perceptions of all relevant actors with regard to the neutrality of humanitarian aid been gauged?	Acceptance Accountability to affected populations
Balancing neutrality with other principles	What compromises need to be made in order to ensure a reasonable balance with other principles?	
Independence		
Institutional and political independence	How do agencies secure their independence given the political and military positioning of many Western donors? And when they are part of a so-called 'multi-mandate' institution such as the UN, or when they have a national affiliation in their name? Given the enormous politicisation of this European context, what has humanitarian leadership in the country done to maintain the independence and neutrality of the humanitarian response? How/do donors balance political positions with humanitarian funding and engagement (e.g. choosing if/how to advocate with GoU on behalf of humanitarian actors)?	
Financial independence	What humanitarian funding conditions do agencies accept? Do they have red lines? Are these red lines collectively negotiated/ agreed upon? How do aid/crisis responders navigate (potentially) being dependent on particular funding sources? Has this evolved given the recent financial cuts in the sector?	
Operational independence, including technical and logistical aspects	How do agencies ensure that they remain independent, while using the transport or logistical facilities of non-humanitarian actors? What operations are they implementing that contribute directly to government services?	

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