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## **UK MOD Civilian Harm Mitigation and Response (CHMR) Baseline Study 2024/25**

### **External Summary Report**

#### **1. Background to the work**

The UK takes its obligations under the Law of Armed Conflict (LOAC) and its responsibility to protect civilians during military operations extremely seriously. These obligations are not treated as aspirational or discretionary: they are embedded in how Defence plans, authorises, and conducts operations. The Ministry of Defence (MOD) implements these commitments through binding policy, doctrine, legal oversight, and professional military practice, ensuring that the protection of civilians is integral to operational decision-making at all levels.

This approach is underpinned by the UK's long-standing commitments to Protection of Civilians (POC), its endorsement of the Political Declaration on the use of Explosive Weapons in Populated Areas (EWIPA), and the Defence Human Security framework. Together, these form a coherent and mutually reinforcing set of standards that guide how Defence seeks to prevent, minimise, and address civilian harm in the course of military activity. While the term *Civilian Harm Mitigation and Response (CHMR)* is not formally established in UK or NATO doctrine, its constituent elements—preventing harm, responding effectively when harm occurs, and learning lessons—are already reflected within UK policy and practice.

Since 2022, the UK has also participated in an emerging international community of like-minded states focused on advancing best practice on CHMR. This engagement has provided a useful comparative lens through which to assess UK Defence activity. It demonstrates that, although the UK does not adopt CHMR as a discrete policy construct, its existing approach aligns closely with—and in several areas exceeds—the standards being developed internationally, particularly in relation to upstream mitigation of civilian harm.

In 2024, the Ministry of Defence commissioned an independent study to assess and baseline Defence policy, doctrine, and procedures relevant to the prevention of civilian harm, using a CHMR framework as an analytical tool. The study, completed in November 2025, examined the extent to which existing Defence practices collectively deliver a credible and scalable approach to mitigating, responding to, and learning from civilian harm. This summary report provides an overview of the study's findings and recommendations.

The study concludes that UK Defence has developed sophisticated and robust mitigation practices that are diligently applied and have been highly effective in recent operations. The consistent avoidance of mass-casualty incidents has reinforced confidence in these systems and reduced the operational demand to further develop response and investigative mechanisms. While this approach has been fit and appropriate for the scale and tempo of recent conflict, the study identifies a potential risk should Defence be required to operate in higher-intensity warfighting contexts, where civilian harm risks, scrutiny, and political consequences may be significantly greater. The findings therefore emphasise the importance of future-proofing CHMR-related capabilities to ensure that Defence remains prepared, credible, and accountable across the full spectrum of conflict.

Peer nations such as the Dutch and US have rapidly driven forward policies and processes for CHMR in recent years. This, however, has been galvanized as a result of mass-civilian casualty events that were a product of strike action they were involved in. While the UK has not experienced such an incident, the UK recognizes the importance of continual iteration of systems with a view to establishing best practice. With the evolving threat picture and increased risks of high intensity combat in the future, there are strong reasons to pre-emptively assure and update CHMR capabilities. Nevertheless, the strong mitigation approach and subsequent low level of civilian casualty incidents should be applauded and reflects an institution committed foremost to prevention of harm.

Since the reports' completion in late 2025, actions have been taken to explore strengthening in targeted areas. Specifically, work is being actioned to consider investigation and response capabilities such that they reflect potential changes in scale and tempo of conflict ensuring that they are fit for the future. These are set out in the final section on Next Steps.

## **2. Methodology and Approach:**

An independent consultant was recruited who had both a professional military background and professional experience working on behalf of and with international civil society experts working on protection of civilians concerns. A framework for assessment on CHMR was developed and drew on the experiences of likeminded states that had delivered and undertaken their own assessments on CHMR. The assessment framework utilised the US CHMR Action Plan specifically as a tool in support of this. Noting the high

level of expertise within the civil society and academic community, a brief was given to externals as part of the launch phase of the work. A consultation between the consultant and civil society and NGO experts was furthermore conducted. This session, convened and chaired by civil society, enabled the consultant to understand and integrate into the assessment best practice standards and metrics against which Defence could be assessed.

For the delivery of the study, the consultant interviewed a broad cast list of personnel within Defence, ranging from operational planners in individual commands (Army, Navy, Air and Cyber and Strategic Operations Command (CSOC)), through to senior officials and military leaders. They reviewed operational planning and targeting policies and looked at training practices. Before finalisation, an internal stakeholder workshop reviewed the findings and assessed the technical feasibility of the recommendations within Defence structures and constraints.

### **3. Findings**

#### **3.1 Mitigating Civilian Harm**

The review finds that the prevention of civilian harm is deeply embedded in UK Defence culture, particularly within the targeting community. Mitigation is treated as a core professional and ethical responsibility and is underpinned by strong adherence to International Humanitarian Law, rigorous targeting processes, and extensive legal and policy oversight. Interviewees consistently expressed confidence that these systems are effective and that they set the UK apart from many allies in terms of risk tolerance and procedural discipline.

Mitigation efforts are concentrated in the targeting cycle. These include stringent target selection criteria, positive identification requirements, persistent intelligence surveillance, pattern-of-life analysis, and mandatory involvement of legal advisers and policy advisers in decision-making. Collateral Damage Estimation (CDE) methodologies, adapted from US models with national caveats, are applied conservatively and are designed to err on the side of caution. Where additional risks are identified, specialist modelling and technical advice are commissioned to ensure decision-makers are presented with worst-case assessments of potential civilian harm.

This mitigation-centric approach has reinforced a high degree of institutional confidence that civilian harm caused by current UK operations is extremely unlikely. Many stakeholders believed that the absence of credible allegations in recent operations demonstrates the effectiveness of current systems. However, the review cautions that confidence in mitigation has also reduced incentives to invest in complementary response mechanisms. The prevailing assumption that harm will not occur has shaped policy, resourcing decisions, and organisational priorities.

### **3.2 Policy Alignment and the Absence of a UK CHMR Framework**

A central finding of Section 2 is that the UK lacks a coherent policy framework for CHMR. Unlike the United States, which has formalised CHMR through a dedicated policy, action plan, governance structures, and resourcing, UK responsibilities relevant to CHMR are dispersed across multiple domains. Human security policy, targeting doctrine, legal processes, and operational practices each address elements of civilian harm, but there is no unifying framework that brings mitigation and response together as a single capability.

The lack of a singular policy creates some challenges. Internally, there is a risk that ownership and accountability for CHMR-related activity could be obscured - although this is not actively seen in practice. Externally, it complicates the ability for external agencies to assess the UK position towards this suite of activities. For example the Civilian Protection Monitor ultimately assesses the UK as largely uncommitted. The review emphasises that this assessment reflects gaps in response mechanisms rather than an absence of mitigation intent or legal compliance.

The report considers several options for addressing this gap, including integrating CHMR into existing human security or targeting policy, or developing a standalone CHMR policy. Each option carries implications for resourcing, governance, and institutional buy-in. In particular, unless integrated into targeting policy and doctrine there is a risk that standalone CHMR policy or doctrine could be seen as adjacent to core business with the associated risk of it not being implemented as a core part of operational planning.

### **3.3 Scalability and Warfighting Considerations**

While mitigation processes are robust, the review raises concerns about their scalability. Current practices are resource-intensive and depend on highly trained specialists, advanced intelligence capabilities, and precision weapons. Stakeholders questioned whether the same levels of scrutiny, surveillance, and risk tolerance could be sustained during high-tempo, large-scale combat operations, particularly where munition stockpiles are constrained and decision-making timelines are compressed.

While the measures have been fit for current tempo and scale of combat, in future warfighting scenarios, commanders may face higher levels of acceptable risk and fewer opportunities to mitigate harm through precision and persistence. Without explicit consideration of how civilian harm mitigation and response should function in these contexts, Defence risks applying inappropriate assumptions or facing unanticipated consequences.

### **3.4 Response to Civilian Harm**

The review finds that formal response mechanisms have not evolved or been further developed since land campaigns in Iraq and Afghanistan. Owing to a lack of requirement due to upstream harm mitigation measures, while legacy processes once existed for

tracking civilian casualties, conducting investigations, and providing amends, these systems have fallen into disuse. In contrast to the Dutch and US, the UK has lacked a galvanizing whereby the mass civilian casualties have forced the need and political urgency to strengthen its response systems.

Consequently, the low frequency of civilian harm has meant that Defence currently does not maintain a central register of civilian harm incidents or allegations. Allegations are typically received ad-hoc and are addressed on a case-by-case basis. Technical experts compare allegations against strike records, and most are dismissed due to a lack of evidence or because UK forces were not operating in the location identified. However, there is no systematic recording of allegations, rationales for dismissal, or lessons identified.

### **3.5 Investigations and Accountability**

While targeting policy emphasises operational record-keeping and acknowledges that inquiries may occur, it does not define investigative standards, responsibilities, or procedures. In practice, responsibility for investigating civilian harm could fall across intelligence, legal, service police, or operational chains, but there is no formalised mechanism to coordinate these actors.

The review also highlights that while the system has been sufficient to date, especially given the preferred emphasis on upstream mitigation of harm, there is uncertainty regarding how investigations would be conducted in future warfighting contexts, particularly when operating on the territory of allied states. Assumptions that host-nation institutions would manage investigations have not been tested and may not be sufficient in politically sensitive or highly contested environments.

### **3.6 Tracking, Transparency, and Use of Information**

The absence of tracking systems undermines Defence's ability to learn from incidents, demonstrate accountability, and engage credibly with external stakeholders. While strike data is retained for extended periods and has previously been used to support transparency initiatives, these practices are not institutionalised and rely heavily on individual continuity rather than system design.

The review notes that Defence has experimented with ad hoc measures, such as the use of open-source intelligence to monitor post-strike effects, but these are not standardised. Without a formal framework for collecting, analysing, and sharing information on civilian harm, Defence risks being reactive rather than proactive in its response to allegations or incidents. Once again, this has been adequate for the scale of tempo of warfighting to date, but may not be sufficient should scale and tempo of conflict change.

### 3.7 Post-Harm Response and Amends

The UK has forged its experience on post-harm response during operations in Northern Ireland and Afghanistan. Procedures for providing redress however have not been updated for contemporary operations. Interviewees described case-by-case approaches to response. While this has been adequate for the level of harm encountered in recent years, better systematization through policy guidance or institutional support could help assure that the mechanisms are fit for future operations.

In a future conflict involving higher civilian harm, clear post-harm response arrangements could avoid exacerbating harm to civilians, strengthen local legitimacy, and mitigate strategic and reputational risks for Defence.

## 4. Conclusions

Defence's approach to civilian harm is heavily weighted toward mitigation with robust systems in place and a culture of harm mitigation embedded amongst relevant personnel. While mitigation systems are strong and have been effective in recent operations, they are not a substitute for a comprehensive allegations tracking and response mechanism that is fit for scalability should the tempo of conflict dramatically change. The UK has thankfully not experienced a galvanizing event such as a mass-civilian casualty incident that has come about through lawful UK action. That said, future proofing systems and establishing best practice should not need to wait for such a mobilising event. This is all the more pertinent given SDR recommendations for war-fighting readiness. Investment into tracking, investigation, transparency, and post-harm response capabilities could mitigate possible areas of vulnerability, particularly in high-intensity warfighting contexts.

## 5. Key Recommendations

The report recommends the following actions.

- a. Establish a Community of Interest to explore the implications of introducing CHMR as a formalised capability.
- b. A costed assessment of professionalising CHMR,
- c. Clarification of policy ownership,
- d. Development of systems to track civilian harm and allegations.
- e. Formalisation of investigation procedures,
- f. Strengthen the use of open-source intelligence for post-strike analysis,
- g. Test assumptions about host-nation roles,
- h. Refresh legacy mechanisms for amends and post-harm response.

Together, these measures are intended to rebalance Defence's approach so that mitigation and response form a coherent, credible, and scalable CHMR capability.

## 6. **Next Steps:**

Following the report, policy work has been underway to review recommendations and identify next steps. Action that have been delivered since the report's conclusion and are planned include:

- An internal Defence stakeholder validation exercise reflecting on the reports findings and the feasibility of delivery of recommendations. Taking place in October 2025, this saw broad acknowledgement of findings and early discussion on where and how strengthening could take place.
- Advice to ministers is being prepared on the scope and model of future work, building on the excellent mitigation measures currently applied and due consideration to the risks, challenges and opportunities when enhancing current CHMR capabilities.
- Cross-Defence consultation will be undertaken to ensure that CHMR and operational effectiveness are considered together to ensure we strengthen whilst not compromising on lawful and necessary military action.
- Defence continues to co-chair the International Contact Group on CHMR and hosted the last international event in January 2026, convening both likeminded states as well as civil society experts.
- Defence pro-actively engages and attends EWIPA international expert events, bringing both policy and operational expertise, ensuring that policy commitments can be translated into operational reality.