GENDER ALERT NO. 3

Out of jobs, into poverty – the impact of the ban on Afghan women working in NGOs

13 January 2023

Introduction

On 24 December 2022, the Taliban\(^1\) issued a letter\(^2\) banning women from working in international and national non-governmental organizations (NGOs), the latest attack in a series of systematic infringements on the fundamental rights of women and girls since the Taliban takeover of Kabul in August 2021.\(^3\)

The 24 December 2022 directive has triggered a global response.\(^4\) Twenty-four hours after the ban, four of the largest international non-governmental organizations (INGOs) operating in Afghanistan temporarily suspended operations, stating that they cannot reach the millions of children, women and men in need of assistance without female staff and calling the directive an attack on humanitarian principles, while affirming that humanitarian aid should be provided solely based on need, without discrimination.\(^5\)

\(^1\) The letter was submitted by the de facto Ministry of the Economy to the Agency Coordinating Body for Afghan Relief (ACBAR) – the largest umbrella of civil society organizations operating in Afghanistan.

\(^2\) For the purposes of analysis, and in the absence of clarity on the precise format or taxonomic attributes of this and other public announcements made by the de facto authorities, the letter dated 24 December 2022 is referred to in this Gender Alert as a ‘directive’, or ‘ban’. The de facto authorities have publicly issued a plethora of formal and informal announcements, prescriptions and prohibitions since August 2021, with no set classification structure indicated as ordering these documents (or discernible from the consistency with which the content of these documents has been delivered, enforced or upheld).

\(^3\) To date, two exceptions have been made to the ban: (1) a verbal exemption granted for women health care workers, and some localized agreements made whereby women can participate in select activities/interventions; (2) an education exemption enabling women teachers and girls to attend school up to grade six.


Is your organization able to operate following the ban on women working in NGOs?

- Operating: 6%
- Partially operating: 60%
- Not operating: 34%

Top 3 main activities targeting women and girls stopped after the ban:
- Social cohesion: 16%
- Gender-based violence: 12%
- Education: 71%

Percentage of women staff in the organization:
- Over 70%: 47%
- Over 50%: 33%
- Less than 50%: 20%

Top 3 immediate impacts of the ban on the ability to reach women:
- Women not able to attend meetings/ workshops: 18%
- Women not able to access women's services: 17%
- Women's needs cannot be assessed: 14%

Percentage of women main breadwinners in the organization:
- Over 70%: 84%
- Over 50%: 13%
- Less than 50%: 2%

Top 3 immediate impacts on the organization if the ban remains in place:
- Not able to pay women staff: 17%
- Not able to attend the needs of women and girls: 16%
- Not able to reach women-headed households: 15%

Top 3 main beneficiaries affected by the ban:
- Women and girls: 25%
- Women headed households: 12%
- Women survivors of violence: 12%

If the ban remains in place, would women who lost their jobs have access to another job?
- Yes: 5%
- No: 95%
The 24 December 2022 directive compounds the multiple overlapping humanitarian and economic crises occurring in Afghanistan, where 11.6 million women and girls1 will need humanitarian assistance in 2023 and 97 per cent of the population are at risk of falling below the poverty line – within an economy that has contracted by an estimated 30 to 35 per cent (between 2021 and 2022).2

This latest directive increases the pace of an already rapid downward movement toward regressive gender norms and blanket discrimination against women. It has induced many Afghan women to fear appearing in public and social settings, increased their feeling of being a burden on their families, and caused loss of confidence, self-worth, and pride.

There is well-founded fear on the ground that this directive will consolidate male dominance and further reduce opportunities for women in both public and private settings, while removing the women of Afghanistan as a fundamental and potentially powerful economic, social and political force in the long term.

The loss of the countervailing weight of a group that has been characterized by moderation and constructive approaches to the crises facing their state could have far-reaching consequences for both Afghanistan and the broader region, occurring in a highly volatile national landscape marked by extremism and civil war.

The immediate and long-term implications of the 24 December 2022 directive build on the ecosystem of formal ‘decrees’ and informal practices limiting the agency and autonomy of Afghan women – regulations to simultaneously police their access to services and public space (through mahram requirements3) and prohibitions of their rights to work and education at secondary level and beyond.4 This latest directive signals a further contraction of civic space and solidifies the Taliban’s vision for a society predicated on the erasure of Afghan women across all social contexts.5

Developed during the two-week follow-up period after the 24 December 2022 ban, this Gender Alert analyses the impact of the directive through the insights of Afghan women’s civil society organizations. The Gender Alert primarily focuses on the immediate repercussions of the ban on humanitarian assistance, as well as the implications for the economy and women’s empowerment.

This Gender Alert concludes that the 24 December 2022 ban: (1) is discriminatory and dictates who humanitarian actors can(not employ, and who they can reach with assistance; (2) has multilayered implications that go beyond the inability of reaching women and girls with life-saving assistance, including dealing a further blow to the Afghan economy amid the ongoing crisis; and (3) speeds up the erasure of Afghan women and girls from all aspects of Afghan public and private life.

Methodological note: To develop this Gender Alert, two weeks after the 24 December 2022 directive was issued by the Taliban, UN Women consulted 165 Afghan women who, prior to the announcement of the directive, had worked in national and international humanitarian NGOs, covering various different sectors, professional backgrounds, ages, and locations. Consultations reached women across Afghanistan and across the different humanitarian sectors.6

These consultations were supplemented by an online survey conducted by 127 national non-governmental organizations (NGOs), 79 per cent of which were led by women (with 47 per cent of the NGOs being staffed by at least 70 per cent women).7 The primary data collection methods used to inform this Gender Alert seek to provide insights into trends and patterns. They are not nationally representative and do not seek to replace state-wide data collection efforts.

Key findings and analysis

“This is not a problem for only a few women, but the entire population of Afghanistan.”

Immediate impact on the organizations surveyed

In the immediate aftermath of the 24 December 2022 ban, 94 per cent of the national organizations surveyed either fully or partially closed operations. Of these national NGOs, 64 per cent reported that over 70 per cent of their activities were directly impacted by the ban. The impact of the ban was felt immediately and across diverse humanitarian sectors. Education and protection (e.g. activities in the areas of child protection and gender-based violence (GBV), such as case management and counseling services for women survivors of violence) have been primarily impacted.8 The findings show also

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3. In December 2021, the Taliban issued an order requiring women to be accompanied by a mahram (male relative companion) when travelling distances of over 72 kilometres. In May 2022, the Taliban ordered women to fully cover their bodies, including their faces, if appearing in public (and to stay at home generally).
4. This latest directive signals a further contraction of civic space and solidifies the Taliban’s vision for a society predicated on the erasure of Afghan women across all social contexts.
5. Developed during the two-week follow-up period after the 24 December 2022 ban, this Gender Alert analyses the impact of the directive through the insights of Afghan women’s civil society organizations. The Gender Alert primarily focuses on the immediate repercussions of the ban on humanitarian assistance, as well as the implications for the economy and women’s empowerment.
6. Consultations were facilitated in Dari and/or Pashto and gravitated around two mains areas: (1) the impact of the ban on women’s NGOs and women working for national NGOs, across the humanitarian-peace-development nexus; and (2) the long-term impact of the decree on Afghanistan.
7. https://nam10.safelinks.protection.outlook.com/?url=https%3A%2F%2Freliefweb.int%2Fnode%2F3923484&data=05%7C01%7Cahmed.al-ajmi%40unwomen.org%7C6%7C6Kc38w6%7Cspvj3Q%3D&reserved=0
8. These consultations were supplemented by an online survey conducted by 127 national non-governmental organizations (NGOs), 79 per cent of which were led by women (with 47 per cent of the NGOs being staffed by at least 70 per cent women).
that the following areas of humanitarian work have been partially or fully stopped: distribution of food and medicine; winterization support; agriculture; reproductive and maternal health; psychosocial support; education and livelihood trainings; water, sanitation, and hygiene (WASH) projects; and shelter, and distribution of non-food items.\(^{13}\)

Given the immediate impact of the absence of women workers across all humanitarian clusters, these findings underline the importance of the full and equal participation of women for operational effectiveness across the spectrum of humanitarian aid delivery.

Those Afghan women consulted reported that the Taliban have been swifter in their enforcing and monitoring the 24 December 2022 directive, compared to the various other bans, directives, and restrictions targeting women and girls since August 2021.\(^{14}\) Women consulted reported many instances of the DFA immediately verifying compliance with the directive. Before 24 December 2022, women humanitarian workers already faced significant interference in delivering life-saving assistance, including intimidation, harassment, and arbitrary arrest.\(^{15}\) However, after 24 December 2022, the organizations consulted for this Gender Alert reported that the de facto authorities (DFA) have made several visits to NGO offices to verify compliance with the new directive.\(^{16}\)

The Afghan women consulted also reported an increased number of DFA checkpoints across urban centres in some provinces, which was interpreted by those consulted as a way to further control women’s movement.\(^{17}\) Combined with previous restrictions on women’s presence in public spaces,\(^{18}\) the 24 December 2022 ban emboldens Taliban foot soldiers to question and intimidate women arbitrarily even more than before, as the directive sends a signal that there is no reason for any woman to appear in public unaccompanied.

In a context where women’s right to work has been systematically reduced to care-giving roles and vocational sectors such as health, education, and humanitarian work, the 24 December 2022 ban cuts women out of the last remaining sector where they were prominent, highly visible and could continue to hold leadership roles. The erasure of women from humanitarian sectors is all the more significant given that women make up between 30 and 45 per cent of international NGO staff in Afghanistan\(^{19}\) (and between 50 and 55 per cent of staff at the national organizations surveyed).

The exclusion of women from the NGO sector also holds very tangible implications for households, as 84 per cent of the 127 national organizations surveyed reported that the overwhelming majority of their women staff – over 70 per cent – are the main breadwinners in their families. Thus, should the ban remain in place, its first landscape-altering consequence will be immediate: thousands of households will lose their main source of income.

If women NGO workers are pushed out of their employment overnight, it condemns them, and those whose livelihoods depend on them, to dependency on humanitarian assistance. Some 93 per cent of the organizations surveyed indicated that without their women staff they will be forced to either fully or partially cease operations. The loss of the specialized skills and technical expertise of tens\(^{20}\) of thousands of women humanitarian staff to the ban will create an unbridgeable capacity gap.

### Immediate impact on beneficiaries and access to affected women and girls

Women humanitarian workers in Afghanistan are uniquely placed to access women and girls with life-saving services and work around the restrictions on affected women’s mobility.\(^{21}\) As one Afghan woman indicated during a consultation, “women can do what men do, but men cannot do what women do.” The consultations emphasized the critical role played by women’s organizations and women humanitarian workers across all areas of humanitarian work, from providing food to vulnerable populations to distributing hygiene kits and reaching women with health services.

Social norms narrow the scope of services that men can deliver to women. This reality reinforces the need for activities ‘for women, by women’. The latest ban, coupled with a low rate of services available for survivors of violence, and the dismantling of the entire legislative structure that protected women from abuse following the August 2021 Taliban takeover, leaves women largely

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13 Comments made during multiple consultations.
14 Comments made during all consultations.
15 Comments made during multiple consultations.
16 Comments made during multiple consultations.
17 Ibid.
18 On 7 May 2022, the Taliban ordered Afghan women to fully cover their bodies, including their faces, if appearing in public (and to stay at home generally). On 9 November 2022, the Taliban imposed restrictions preventing women from visiting gyms, parks, and public baths. On 20 December 2022, the de facto Minister of Higher Education announced an order “suspending the education of females until further notice”.
20 A point raised by Afghan women development professionals in all nine consultations with members of this group was that they hold a diversity of roles at NGOs, including as programme managers; professionals in the fields of nutrition, GBV and reproductive health experts; heads of office; financial, logistics, and procurement officers; social workers; doctors; nurses; teachers; and human resources and administrative officers.
21 The impact on services for women survivors of violence was raised in all nine consultations.
outside the reach of services, information, and support for their life-saving needs.

The logic applied to protection services affects women's access to all types of life-saving services, including food, medicine, emergency shelter and non-food items, among many others. With the expertise brought by women's organizations in response efforts and the need for specific skills of women humanitarian workers, the absence of women NGO workers creates a significant gap, as no other stakeholders are as effective and critical in reaching women and girls.

Anecdotal insight at this point into the level of impact to be expected should the 24 December 2022 ban remain in place can be seen gained from reflecting upon the fact that the 127 national organizations surveyed reported that, in terms of their work alone, over one million women beneficiaries will be directly impacted, across the 17 provinces served by these organizations.22 While this figure captures only the reach of these 127 organizations, it equates to almost one tenth of the 11.6 million Afghan women and girls in need of humanitarian assistance in 2023,23 and underscores the unique role of national organizations in accessing affected communities.

Exacerbated by the absence of women humanitarian workers in the field, and already impeded by prior restrictions preventing men humanitarian workers from interacting with affected women and girls,24 access to women and girls, and particularly female-headed households (FHHs), displaced women and girls, and women living with disabilities, has been critically constrained by the directive – many of the organizations surveyed were the only actors in their field or sector serving these specific populations.25

The national organizations consulted for this Gender Alert reported being unable to reach FHHs, which comprise at least 10 per cent26 of all Afghan households. The inability to reach female-headed households will increase the prevalence of negative coping mechanisms. The REACH Whole of Afghanistan Assessment 2022 found that FHHs were more likely to use high-risk negative coping strategies, with 29 per cent of FHHs having at least one child engaged in child labour (up from 19 per cent in 2021).27 The 24 December 2022 ban risks pushing more people to succumb to negative coping mechanisms in an attempt to survive, ultimately increasing the number of women and men in need, due to the loss of the multiplier impact that comes with putting assistance directly into the hands of women.28 The Afghan women consulted highlighted that each woman supported with humanitarian aid reaches at least 6–10 people; women's roles as caregivers mean that aid delivered also reaches children, elderly and people living with disabilities, and men.29

Obstructed access is now impacting every phase of the humanitarian programming cycle.26 The ban prevents the setting up of gender-segregated distribution serviced by women humanitarian workers: women humanitarian workers cannot provide services directly to women.30 For those female-headed households who do not have a male family member to collect assistance on their behalf, the absence of women humanitarian workers means that they may be left out of the humanitarian response.

The inability to assess women's needs and the lack of options for monitoring women's access and satisfaction with the assistance were challenges also raised by those organizations consulted for this Gender Alert.32 The absence of women risks spawning a humanitarian response that is not calibrated to the needs of all populations, compounding the vulnerability of those groups which have already been left behind in Afghan society, such as women and children.

**Organizational response and mitigation measures**

Seeking safety for their staff, 65 per cent of the 127 organizations surveyed reported that women staff are now working from home. In terms of the immediate actions taken by the organizations to mitigate the impact of the ban, many organizations reported that they are attempting to negotiate with the DFA and community leaders to seek exemptions from the ban. One quarter of survey respondents indicated that they have already started negotiations with local authorities. Those Afghan women consulted highlighted that negotiating a removal of the ban as the only viable path forward, while also sharing that removing this directive will not automatically translate into dismantling the broader system that restricts their work.

2127 organizations across 17 provinces reported these figures in the online survey.
24Comments made during multiple consultations.
25Inter-Cluster Coordination Afghanistan presentation. 2022.
28Comment made during multiple consultations.
29Survey respondents indicated that the following areas of the humanitarian cycle would be most impacted: women cannot attend meetings and workshops (18%); women cannot be accessed in service delivery (17%); women's needs cannot be assessed (14%); women cannot access assistance (14%).
30Comment made during consultation meeting with women humanitarian workers.
31These challenges were raised in the two consultations held with the Afghan women working for humanitarian NGOs.
The organizations consulted were in the initial stages of using alternative modalities to reach women and girls. For their part, the Afghan women consulted emphasized that while some programmatic activities can be conducted online, poor internet connection (especially in rural/remote areas) and frequent power outages (even in cities) reduce the effectiveness of these activities and their results. Those women consulted agreed that life-saving work requires in-person interactions with affected populations.

Many of the Afghan women consulted also indicated that working from home creates challenges for women as it increases their isolation, which, in turn, may lead to increased prevalence of mental health issues. One Afghan woman noted: “We [Afghan women] should not have to work from home, because we slowly are erased from society [sic].” Research on the impact of restrictive measures to fight the effects of the Coronavirus disease 2019 (COVID-19) pandemic has shown direct links between the work from home modality and increased rates of domestic violence. In the context of Afghanistan, which already has one of the highest rates of domestic abuse globally, work from home will amplify protection concerns for women – who will have no safe spaces where they can seek shelter and support, and no legal structure to protect them from abuse.

The provision of assistance through male family members and engaging with women leaders and community volunteers were during the consultations also discussed as potential response measures to the situation caused by the 24 December 2022 directive. The Afghan women consulted indicated that protection concerns, including sexual exploitation and abuse, may increase if humanitarian aid is channelled only through men. Overall, such measures require assessment going forward, as at the time of consultation, the organizations did not have enough evidence to decide whether further harm could be created by using these temporary modalities.

Putting in place mitigation measures ultimately does not resolve the fundamental breach of humanitarian principles triggered by the Taliban’s decision to block women from working for NGOs. Afghan women consulted unequivocally called for its reversal on the grounds of its interference with lifesaving assistance and as a fundamental violation of their rights. The pursuit of interim measures risks normalizing that assistance can be provided without women, feeding into the Taliban’s narrative that women are not needed, and that it is possible to deliver the humanitarian response without them.

The economic impact

“All the doors are shut and there is no hope.”

Although 73 per cent of organizations reported that they are still paying the salaries of women staff, 95 per cent reported that if the ban remains in place, the affected women would not be able to find another job. Most of the Afghan women consulted indicated being unable to pick up their most recent salaries, while those not on permanent contracts fear that their salaries will cease to be paid. Across all consultations, these Afghan women working for humanitarian NGOs highlighted the economic implications of the directive.

The economic impact of women NGO staff losing their jobs will radiate outwards. The 127 surveyed organizations alone reported that they currently employ 6,165 women staff in Afghanistan, whose jobs are now at risk. As such, if the ban remains in place, 107 (84 per cent) out of the 127 organizations surveyed anticipated that they would need to lay off women staff, as they would be unable to continue paying their salaries. This shows the significance of the link between women’s NGO work and livelihoods.

Considering that a national or international NGO may employ hundreds, and sometimes thousands, of women staff in Afghanistan, if left intact, the ban risks putting tens of thousands of households at increased risk of poverty. The uncertainty of these workers’ personal financial situation as well as their sense of responsibility to beneficiaries is a cause of significant distress, which most

36See the UN Women briefing series on COVID-19 and EVAW.
37Comment made during consultation.
38UN Women. 2022. Gender Alert No. 2: Women’s rights in Afghanistan one year after the Taliban take-over. 15 August 2022.
39Comments made during multiple consultations.
40Save the Children alone has 2,490 female staff across Afghanistan: NRC (Norwegian Refugee Council). “A ban on female aid workers in Afghanistan will cost lives, warn leading aid groups.” News, 29 December 2022; and the International Rescue Committee employs more than 3,000 women: IRC (International Rescue Committee). “IRC to suspend programmes in Afghanistan following Taliban ban on women working for NGOs.” News, 25 December 2022.
Afghan women consulted fear will lead to an increase in mental health issues among affected women, alongside increased prevalence of suicide within this group.40

The economic impact of a loss of livelihood and employment opportunities, as well as potential capacity, skills, and training, will worsen an already rapidly contracting economy. The cumulative loss of output from reducing the number of women in employment by only 50 per cent (a level which, at the time of writing, has likely already been exceeded) was projected in November 2021 to reach US$1.5 billion between 2022 and 2024.41 A loss of programming targeting women’s financial situation risks devastating women’s current and future economic potential, reducing the skilled labour force and corroding the vibrance and resiliency of the private sector.

Conclusion

The de facto suspension of all services led by women for women following the 24 December 2022 ban, combined with the further weakening of the NGO sector, is set to have catastrophic implications for the state of Afghanistan and potentially the broader region.

Within Afghanistan, indicators for gender equality, poverty, health, and food insecurity will worsen, which will contribute to an increase in negative coping strategies – already being observed42 – such as the sale of children,43 emigration; child, early and forced marriage; and suicide.44 Girls forced into marriage face increased risk of GBV, limitations in accessing reproductive health, and lower levels of completed education.45

Women’s further exclusion from the workforce commensurately negates their economic potential, degrades their skills learned, and – combined with the acute effects of a loss of assistance – risks causing psychological impacts which may feed an intergenerational spiral of trauma.46 Further migration from Afghanistan risks increasing short-, medium- and long-term instability and adding to the already significant loss of expertise, knowledge, and skills held by educated and trained professionals.47 The Afghan women NGO workers consulted pointed to a further increased risk of suicide among women and girls, in particular.48

The Afghan women consulted overwhelmingly see this latest directive as part of a long chain of curtailments of their rights, and as an attempt to snuff out their last embers of hope and normalize the invisibility of this group in the Afghan landscape.49 The path to this latest DFA directive has been 18 months of largely unchallenged public orders, with the severity of the orders increasing with each new announcement – none of which have been removed to date.50 However, the 24 December 2022 directive, coming within this ever-longer line of public orders, is considered a death sentence for millions of Afghan women, who will be unable to support their families – through access to life-saving assistance and support, or their work in delivering this direly needed assistance. The psychological impact of the DFA attempt to limit humanitarian aid during the current humanitarian catastrophe and further target women is already unprecedented in the Afghanistan context.

The Afghan women consulted indicated believing that this latest order, like previous announcements, shows clear intent within the DFA leadership to attack women’s right to life; the previous – largely unchallenged – orders issued by the DFA created the stepping stones for this latest order.

The international community now finds itself presented with a unique window of opportunity to draw a line in the sand51 and prevent the 24 December 2022 directive from wreaking damage that cannot be undone. In this troubling context, the Afghan women humanitarian NGO workers consulted for this Gender Alert put forward the following recommendations, with the aim of immediately removing the 24 December 2022 ban on women working for NGOs in Afghanistan – and ultimately all other restrictions hampering and depleting the lives of Afghanistan’s women and girls:

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40Comment made during nine consultations.
42Main coping mechanisms deployed include borrowing, sending children to work, selling assets and out-migration from Afghanistan. Women were more likely than men to resort to coping mechanisms such as borrowing money: Global Protection Cluster. 2022. Protection Analysis Update: Q3. 2022. November 2022. In June 2022, 54 per cent of Afghanistan’s population relied on crisis coping strategies, a rate over five times that recorded prior to 15 August 2021. WFP (World Food Programme) 2022. Afghanistan Food Security Update. Round 10; June 2022. July 2022.
43The sale of children was raised in three consultation meetings.
45Comment made during multiple consultations.
46Ibid.
47Comments made during all consultations.
48Comment made during multiple consultations.
49Ibid.
50Ibid.
51Ibid.
• **Consult Afghan women as equal partners** to inform policy priorities and decision-making through strategic partnerships with women’s NGOs in Afghanistan, amplifying advocacy opportunities that are driven by Afghan women, and ensuring that voices from the ground inform all work undertaken by the international and humanitarian community in Afghanistan.

• **Advocate directly with the DFA**, acknowledging the critical nature of the issue at hand and that a line of previously issued (and largely unchallenged) public orders have created a pathway for increasingly severe announcements, negotiating with and urging the DFA to immediately remove its 24 December 2022 order and allow all Afghan women NGO staff to resume work unimpeded. This should be achieved while ensuring that Afghan women are present in these negotiations and that their priorities are placed to the fore.

• **Maintain direct funding to women-led organizations**, even if direct implementation and delivery is no longer possible. Afghan women should be supported by committing to salary payments and covering institutional costs to enable women’s organizations to reactivate their endeavours, when space and opportunity allows.