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Following the UN Lead? NATO's Contested Sexual Exploitation and Abuse Policy

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Abstract:

The topic of Sexual Exploitation and Abuse (SEA) has been a high-profile issue in UN peacekeeping operations due to well-publicized scandals,¹ which precipitated the development of policy and training. NATO by contrast only adopted its first SEA policy in 2019, lagging behind UN policy initiatives. Nested within NATO's Women, Peace, and Security program of work, this article focuses on explaining the emergence of NATO's SEA Policy. Drawing from a feminist institutionalist lens, we argue that civilian and military officials within NATO were able to overcome apparent contestation to achieve its adoption by navigating NATO's internal processes strategically. Our original empirical analysis uncovers key strategies employed by WPS officials which served to overcome institutional resistance to the SEA Policy. Drawing on our analysis of interviews and training materials, we also offer new insights on how NATO's SEA Policy and training were designed to address underlying attitudes and beliefs that are conducive to the perpetration of SEA in military operations. The article concludes with the policy implications of our study to strengthen NATO's SEA Policy architecture and related trainings.

Keywords: NATO - Women, Peace, and Security - Sexual Exploitation and Abuse - civil-military relations - military training - United Nations - Feminist institutionalism

¹ See Skye Wheeler, "UN Peacekeeping Has a Sexual Abuse Problem | Human Rights Watch," January 11, 2020, <https://www.hrw.org/news/2020/01/11/un-peacekeeping-has-sexual-abuse-problem>.

Introduction

In peace operations, sexual exploitation and abuse (SEA) refers to sexual violence perpetrated by intervening forces onto civilians. Instead of a tactic of armed violence used by belligerents, like conflict-related sexual violence (CRSV), SEA perpetrated by those meant to protect civilians is especially pernicious and constitutes a violation of human rights by those charged with upholding them. SEA and CRSV have grown as areas of policy development and training, backed up by formal UN Security Council resolutions. Under the banner of the global Women, Peace, and Security (WPS) agenda and the commitments made by states in their National Action Plans (NAPs),² the impetus behind these efforts is a recognition that sexual violence is endemic to war. As a set of norms, the WPS agenda further emphasizes that women and girls are disproportionately targeted, with differentiated and equally grave impacts on men and boys, and sexual minorities, though with much less media and policy attention. In this article, we investigate the context in which the North Atlantic Treaty Organization (NATO) has adopted an SEA policy which has lagged the policy developments seen at the United Nations (UN). To understand and explain this context, we argue, is to uncover the resistance and contestation that underpin the policy development process, as well as identify the institutional pathways that NATO officials have employed to drive implementation. NATO is a key actor to study because it has played an important role in international peacekeeping and peacebuilding efforts since the collapse of the Soviet Union in 1991 and has considerable experience with multinational operations, including operations with humanitarian and protection of civilian objectives. While there is much groundbreaking work that looks at gender dynamics at the UN,

² See annex for NATO member state commitments on peacekeeper SEA.

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including on SEA, there is much less available on NATO.³ Our study is the first comprehensive account of NATO's SEA Policy, with original interviews and in-depth content analysis, which translates into an important empirical contribution.

The article proceeds as follows: we first set the context by providing an overview of the literature and policy frameworks which have shaped contemporary debates on SEA. We then draw on feminist institutionalism to situate our analysis and link this to the civil-military dynamics of NATO as a military organization. After our methodology, we present our argument with respect to the contentious nature of NATO's SEA Policy which foregrounds the role of civil-military actors who pursue competing objectives within NATO's gendered institutional setting.

Background on SEA at NATO

By way of context, NATO and the UN share the same definition of SEA. Sexual exploitation is any “actual or attempted abuse of a position of vulnerability, power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.”⁴ Sexual abuse is any “actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.”⁵ SEA, as first acknowledged by the UN, stands apart from CRSV in that it is perpetrated by peacekeepers who take advantage of their unique socio-political position vis-à-vis the vulnerable local population to

³ Recent publications include Aiko Holvikivi, *Fixing Gender: The Paradoxical Politics of Training Peacekeepers* (New York: Oxford University Press 2024); Jasmine-Kim Westendorf and Elliot Dolan-Evans, *Sexual Exploitation and Abuse in Peacekeeping and Aid* (Bristol: Bristol University Press, 2024).

⁴ *United Nations - UN Glossary on Sexual Exploitation and Abuse | HR Portal*, <https://hr.un.org/materials/un-glossary-sexual-exploitation-and-abuse-english>, accessed February 11, 2024; *NATO - The NATO Policy on Preventing and Responding to Sexual Exploitation and Abuse*, http://www.nato.int/cps/en/natohq/official_texts_173038.htm, accessed February 11, 2024.

⁵ *UN Glossary on SEA*, 2024; *NATO Policy on Preventing and Responding to SEA*, 2024.

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exercise sexual predation, from transactional sex (offering food, money, or equipment) to rape. In that context, peacekeepers who perpetrate SEA exploit populations trapped in conflict zones undergoing major upheaval in virtually every aspect of life, rendering resources and security scarce, which exacerbates their vulnerability.

The consequences of SEA in international peacekeeping have most visibly played out in the context of UN missions, due to highly mediatized scandals, the work of investigative journalists and documentarists, the activism of civil society, as well as leadership interventions. The UN has struggled with addressing SEA and has previously identified it as the single greatest threat to its peacekeeping operations,⁶ with UN Secretary General António Guterres declaring that it is a “menace and it must end.”⁷ Upon announcing the 2019 SEA policy, NATO Deputy Secretary General Rose Gottemoeller stated that “NATO prides itself on being the gold standard organization and a community of values... in order to maintain this standard, we need to be equally ambitious when it comes to tackling sexual exploitation and abuse – which means applying a zero-tolerance approach.”⁸

While NATO has not experienced the same level of scrutiny over SEA, we do not mean to suggest that SEA has never or does not occur in a NATO context, rather, public pressure so far appears to be absent as the driving force behind SEA policy adoption and implementation. Moreover, while there was considerable support in NATO capitals and within the alliance

⁶ Thelma Awori, Catherine Lutz, and Paban Thapa, *Final Report: Expert Mission to Evaluate Risks to SEA Prevention Efforts* (New York: UN, 2013), p. 2, <https://static1.squarespace.com/static/514a0127e4b04d7440e8045d/t/55afcfa1e4b07b89d11d35ae/1437585313823/2013+Expert+Team+Report+FINAL.pdf>

⁷ *United Nations - Address to High-Level Meeting on the United Nations Response to Sexual Exploitation and Abuse | United Nations Secretary-General*, September 18, 2017, <https://www.un.org/sg/en/content/sg/speeches/2017-09-18/secretary-generals-sea-address-high-level-meeting>.

⁸ *NATO - Towards a NATO Policy on Preventing and Responding to Sexual Exploitation and Abuse: Opening Remarks by NATO Deputy Secretary General Rose Gottemoeller*, http://www.nato.int/cps/en/natohq/opinions_162333.htm, accessed November 30, 2023.

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structure for the adoption of a CRSV policy, our interviews reveal that this was not the case for SEA, which was instead seen as a UN problem. We thus propose a novel empirical contribution by interrogating the emergence of NATO's SEA Policy, unpacking the complexities that played out during its adoption and implementation. As the existing literature has demonstrated, SEA and gender-related norms are perhaps some of the most difficult to advance inside the military; within a prolifically masculinized institution there is often little enthusiasm for change that challenges patriarchal notions of what the military is and does.⁹ Analyzing NATO's SEA Policy, therefore, offers broader insights into how some of the most contentious policies are negotiated amongst civilian and military actors within NATO.

SEA in Scholarly and Policy Debates

There are different causal arguments for why SEA may occur in peacekeeping contexts and the literature, which now spans over two decades, has examined the gendered, socio-economic, legal, and policy structures that exacerbate vulnerability and create a lack of accountability.¹⁰ Feminist analyses of military institutions and militarized masculinities often stress the gendered attitudes of military men toward local women and girls which may be conducive to the perpetration of SEA, while other scholars have questioned hegemonic masculinity as an explanatory variable due to it denying military men agency.¹¹ Hegemonic

⁹ Sarah Martin, "Reflections on 20-Plus Years of Protection from SEA Work," in Westendorf and Dolan-Evans (eds.), *Sexual Exploitation and Abuse in Peacekeeping and Aid: Critiquing the Past, Plotting the Future* (Bristol: Bristol University Press, 2024): 19-33.

¹⁰ Jasmine-Kim Westendorf and Elliot Dolan-Evans, "Two Decades of Dealing with Sexual Exploitation and Abuse in Peacekeeping and Aid," in Westendorf and Dolan-Evans (eds.), *Sexual Exploitation and Abuse in Peacekeeping and Aid: Critiquing the Past, Plotting the Future* (Bristol: Bristol University Press, 2024): 1-18.

¹¹ Paul Higate, "Peacekeepers, Masculinities, and Sexual Exploitation," *Men and Masculinities* 10, no. 1 (2007): 99–119, <https://doi.org/10.1177/1097184X06291896>.

See von Hlatky, S., & Nicol, W. (2025). Following the UN Lead? NATO's Contested Sexual Exploitation and Abuse Policy. *International Peacekeeping*, 32(5), 1001–1027.
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masculinity is understood as the privileging of stereotypically aggressive masculine traits, such as “strength, physical fitness, aggression, action, competitiveness, and the ability to dehumanize the enemy and defeat them in combat.”¹² Ultimately, SEA should be understood as a diverse and complex phenomenon that is shaped by the nature of peacekeeping missions, their political, economic and cultural contexts, and how multinational peacekeeping forces have different levels of training and proficiency.¹³ Empirically, increased reports of SEA are associated with larger operations with more deployed troops, lower GDP per capita in the host country, and where there have been widespread reports of CRSV in the host country's past conflicts.¹⁴ The literature on peacekeeper SEA also examines power relations within the local political economy. In materially deprived conflict zones, peacekeepers have access to resources, from food to financial aid, that may upend social patterns within host communities.¹⁵ The political economy of SEA is intersectional and highly gendered, as it includes, for example, transactional sex between primarily heterosexual male peacekeepers and local women and girls.¹⁶

Critiques of SEA policy design, as well as its corresponding political and legal accountability problems, are well established and the culture of impunity around SEA is widely

¹² Claire Duncanson, “Hegemonic Masculinity and the Possibility of Change in Gender Relations,” *Men and Masculinities* 18, no. 2 (2015): 234, <https://doi.org/10.1177/1097184X15584912>.

¹³ Paul Higate and Marsha Henry, “Engendering (In)Security in Peace Support Operations,” *Security Dialogue* 35, no. 4 (2004): 481–98, <https://doi.org/10.1177/0967010604049529>.

¹⁴ Ragnhild Nordås and Siri C. A. Rustad, “Sexual Exploitation and Abuse by Peacekeepers: Understanding Variation,” *International Interactions* 39, no. 4 (2013): 511–34, <https://doi.org/10.1080/03050629.2013.805128>.

¹⁵ Silke Oldenburg, “The Politics of Love and Intimacy in Goma, Eastern DR Congo: Perspectives on the Market of Intervention as Contact Zone,” *Journal of Intervention and Statebuilding* 9, no. 3 (2015): 316–33, <https://doi.org/10.1080/17502977.2015.1054660>.

¹⁶ Kaitlin Gibson et al., “Love, Sex, and Exchange in the Context of Peacebuilding in the Democratic Republic of Congo,” *International Peacekeeping (London, England)* 29, no. 4 (2022): 678–705, <https://doi.org/10.1080/13533312.2022.2094781>; Kathleen M. Jennings, “Service, Sex, and Security: Gendered Peacekeeping Economies in Liberia and the Democratic Republic of the Congo,” *Security Dialogue* 45, no. 4 (2014): 313–30, <https://doi.org/10.1177/0967010614537330>; Anna M. Agathangelou and L. H. M. Ling, “Desire Industries: Sex Trafficking, UN Peacekeeping, and the Neo-Liberal World Order,” *The Brown Journal of World Affairs* 10, no. 1 (2003): 133–48.

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decried. One of the key features of the UN's SEA approach is its zero-tolerance policy introduced in 2003, which prohibits any sexual activity between local civilians and peacekeepers.¹⁷ This policy has been criticized for not being effective at reducing the number of SEA allegations and for not holding many perpetrators accountable.¹⁸ Since 2015, only little more than a dozen out of over 600 SEA allegations currently tracked by the UN were referred for criminal accountability, amounting to just over 2% of cases.¹⁹ The UN has struggled with accountability for fear of alienating troop contributing countries (TCC), which ultimately have jurisdiction over prosecuting their soldiers for sexual crimes.²⁰ The zero-tolerance approach has also been criticized on the grounds that it ignores the potential for local women's agency around consensual sexual activity with peacekeepers.²¹ Considering these critiques, the fact that NATO borrowed from the UN's zero-tolerance policy is puzzling, as NATO has not been following the UN lead on WPS all along.

Indeed, UN efforts to prevent and respond to peacekeeper-perpetrated SEA has been an area of focus since the adoption of Resolution 1325, the WPS agenda's landmark resolution in 2000. While studies have lamented the lack of progress, and senior managers and commanders from the UN have found existing tools to be ineffective, yet there is evidence to show that in-mission training results in fewer SEA allegations and that it constitutes the most effective

¹⁷ *United Nations - Secretary-General's Bulletin: Special Measures for Protection from Sexual Exploitation and Sexual Abuse*, (New York, October 9, 2003), <https://documents-dds-ny.un.org/doc/UNDOC/GEN/N03/550/40/PDF/N0355040.pdf?OpenElement>.

¹⁸ Sarah Smith, "Accountability and Sexual Exploitation and Abuse in Peace Operations," *Australian Journal of International Affairs* 71, no. 4 (2017): 405–22, <https://doi.org/10.1080/10357718.2017.1287877>.

¹⁹ *United Nations - Sexual Exploitation and Abuse, Conduct in UN Field Missions*, January 23, 2017, <https://conduct.unmissions.org/sea-data-introduction>.

²⁰ Audrey L. Comstock, "In the Shadow of Peace: Sexual Exploitation, Abuse, and Accountability in UN Peacekeeping," *Global Governance: A Review of Multilateralism and International Organizations* 29, no. 2 (June 8, 2023): 168–84, <https://doi.org/10.1163/19426720-02902003>.

²¹ Diane Otto, "Making Sense of Zero Tolerance Policies in Peacekeeping Sexual Economies" in Vanessa Munro and Carl F. Stychin, *Sexuality and the Law: Feminist Engagements* (Abingdon, UK ; Routledge-Cavendish, 2007).

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preventative measure against SEA.²² Admittedly, there is much room for improvement, like the fact that SEA is often separate from other WPS topics and often appears tacked-on.²³ Gender training has been criticized as a technocratic fix, a critique that might certainly resonate in a NATO context.²⁴

Gender training is particularly tricky in a military context as it is distinct from other military training in that the concepts are complex and there is no baseline awareness among multinational contingents.²⁵ Peacekeepers are overwhelmingly male while the practice of gender training has a feminist lineage that can evoke defensiveness in a martial environment.²⁶ Some participants in the training may not have ever heard of the English term 'gender' or hold negative views of what it means.²⁷ Nevertheless, some scholars have suggested that SEA is a learned behaviour which may be counteracted with the right type of training and that this approach may be more effective than increasing the representation of women in deployed contingents alone.²⁸

²² Nicola Dahrendorf, *Sexual Exploitation and Abuse: Lessons Learned Study*, (New York: DPKO, 2006), p. 15, https://www.peacewomen.org/assets/file/Resources/UN/dpko_addressingsexualviolenceinmonuc_2006.pdf; Kelly Neudorfer, *Sexual Exploitation and Abuse in UN Peacekeeping: An Analysis of Risk and Prevention Factors* (Lanham, Maryland: Lexington Books, 2014); Nicola Dahrendorf, *SEA: Lessons Learned Study* (New York: DPKO, 2006), p. 16.

²³ Martin-Brûlé, Sarah-Myriam, Stéphanie von Hlatky, Savita Pawnday, and Marie-Joëlle Zahar. 2020. *Gender Trainings in International Peace and Security: Toward a More Effective Approach*. International Peace Institute. <https://www.ipinst.org/2020/07/gender-trainings-in-international-peace-and-security>; Holvikivi, *Fixing Gender* (see Chapter 3); Marina Caparini, *Gender Training for Police Peacekeepers: Approaching Two Decades of United Nations Security Council Resolution 1325* | SIPRI, October 31, 2019, <https://www.sipri.org/commentary/topical-backgrounder/2019/gender-training-police-peacekeepers-approaching-two-decades-united-nations-security-council>.

²⁴ Jasmine-Kim Westendorf and Louise Searle, "Sexual Exploitation and Abuse in Peace Operations: Trends, Policy Responses and Future Directions," *International Affairs* (London) 93, no. 2 (2017): 383-384, <https://doi.org/10.1093/ia/iix001>.

²⁵ Angela Mackay, "Training the Uniforms: Gender and Peacekeeping Operations," *Development in Practice* 13, no. 2–3 (2003): 220, <https://doi.org/10.1080/09614520302939>.

²⁶ Aiko Holvikivi, "Training the Troops on Gender: The Making of a Transnational Practice," *International Peacekeeping* (London, England) 28, no. 2 (2021): 175–99, <https://doi.org/10.1080/13533312.2020.1869540>.

²⁷ Nadine Puechguirbal, "Gender Training for Peacekeepers: Lessons from the DRC," *International Peacekeeping* (London, England) 10, no. 4 (2003): 117, <https://doi.org/10.1080/13533310308559352>.

²⁸ Karim and Beardsley, "Explaining SEA in Peacekeeping Missions."

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In the NATO context, WPS has become more integrated across the Alliance's core tasks since it adopted a formal policy in 2007, but SEA has lagged behind. The dynamics of WPS implementation at NATO have been well documented in historical and contemporary institutional settings, but there are many parallels to make with the broader literature on WPS.²⁹ A common theme relates to the contestations, tensions, and contradictions that emerge when different interpretations of the WPS agenda coexist; distinct “constellations of power” shape the evolution of WPS as global norms.³⁰ Some scholars have even pushed back against the idea that WPS are norms or that they constitute an agenda in any real sense.³¹ Some of this contestation manifests itself as organizational resistance and has been studied in the context of international organizations like the UN, NATO, the EU or the African Union, while some contestation is more overtly political, as regional or geopolitical divides play out in WPS spaces.³² Other scholars and practitioners appear more comfortable with this contestation, commenting on the fact that, short of a transformative agenda, institutional actors can push for change strategically and incrementally.³³ Indeed, the policies, processes, and institutional levers appear to be powerful avenues for actors to overcome organizational resistance.³⁴ In the military realm, that has led

²⁹ Katharine Wright, Matthew Hurley, Jesus Ignacio Gil Ruiz, *NATO, Gender and the Military: Women Organising from Within* (London: Routledge, 2019); Heidi Hardt and Stéfanie von Hlatky, “NATO's About-Face: Adaptation to Gender Mainstreaming in an Alliance Setting,” *Journal of Global Security Studies* 5, 1 (2020): 136-159; Stéfanie von Hlatky, *Deploying Feminism: The Role of Gender in NATO Military Operations*, (New York: Oxford University Press, 2022); Katharine A. M. Wright, “Challenging Civil Society Perceptions of NATO: Engaging the Women, Peace, and Security Agenda,” *Cooperation and Conflict* 58, 1 (2023): 61-80.

³⁰ Soumita Basu, Paul Kirby and Laura J. Shepherd (eds.), *New Directions in Women, Peace and Security* (Bristol: Bristol University Press, 2020).

³¹ Paul C. Kirby and Laura Shepherd, *Governing the Feminist Peace: The Vitality and Failure of the Women, Peace, and Security Agenda* (New York: Columbia University Press, 2024).

³² Jennifer Thomson and Sophie Whiting, “Women, Peace and Security National Action Plans in Anti-Gender Governments: The Cases of Brazil and Poland,” *European Journal of International Security* 7, 4 (2022): 531-550.

³³ Holvikivi, *Fixing Gender*; Anne-Marie Goetz, “Foreword: Toward Strategic Instrumentalism,” In Soumita Basu, Paul Kirby and Laura J. Shepherd (eds.), *New Directions in Women, Peace and Security* (Bristol: Bristol University Press, 2020)

³⁴ Claire Duncanson and Rachel Woodward, “Regendering the Military: Theorizing Women's Military Participation,” *Security Dialogue* 47, 1 (2015): 3–21.

See von Hlatky, S., & Nicol, W. (2025). Following the UN Lead? NATO's Contested Sexual Exploitation and Abuse Policy. *International Peacekeeping*, 32(5), 1001–1027.
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feminist scholars to decry the militarization of the agenda or, at the very least, analyze the paradoxes that characterize implementation of WPS in martial contexts.³⁵ For our purposes, we will build on this primarily feminist literature, which accommodates multiple actors (civilian and military officials, civil society, etc.), while paying close attention to how rhetoric and practice is channeled in specific institutional settings.³⁶ Then, in order to explain 1) why the NATO SEA Policy was adopted; and 2) the strategies that facilitated its adoption and implementation, we focus on two main bodies of evidence: first, we analyze the formal policies and training materials developed by NATO, as these documents contain the institution's articulation of the key objectives, prevention measures, and responses. We compare these formal documents to the practices enacted by practitioners, especially gender advisors and gender focal points, which are revealed through interviews. Understanding how policies are articulated, socialized and executed thus requires an analysis of official documents, how these are disseminated, and who is tasked and made accountable for implementation. Moreover, because the content of NATO trainings anticipates and circumvents potential resistance from its military participants, their analysis is quite useful to understand institutional dynamics tied to policy adoption and implementation. Training is a key mechanism by which NATO, as a “teaching machine”, embeds norms into the fabric of the organization.³⁷ Our theoretical framework explained in the next section accounts for this process while highlighting the difficulty of implementing civilian-led policy initiatives in a predominantly military environment, thereby challenging gendered power structures.

³⁵ Barbara K. Trojanowska, *Finding Gender Equality in the Women, Peace, and Security Agenda* (London: Rowman & Littlefield, 2022).

³⁶ Jacqui True and Antje Wiener, “Everyone wants (a) peace: the dynamics of rhetoric and practice on ‘Women, Peace and Security’,” *International Affairs* 95, 3 (2019): 553-574.

³⁷ Katharine A. M. Wright, “NATO's Adoption of UNSCR 1325 on Women, Peace and Security: Making the Agenda a Reality,” *International Political Science Review* 37, no. 3 (2016): 350-361.

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Theoretical Framework: Feminist Institutionalism and Civil-Military Contexts

We draw on feminist institutionalism to understand the context in which organizational change takes place. Feminist institutionalism posits that both formal structures and informal “rules of the game” are gendered in organizations which can constrain actors, ideas, and policy changes, reproducing and reinforcing gender inequality.³⁸ It thus provides an ideal explanatory framework for how gender formally and informally shapes practices, and how this contributes to institutional change, while uncovering power relations within organizations.³⁹ Through our analysis we reveal the ways in which gender dynamics influenced the development of the SEA policy, foregrounding its contested nature as it challenged the established power structures. This is made visible as institutional actors encounter organizational resistance that is political, procedural, or manifest in the context of their professional interactions. This is why analyzing the content of documents and training materials provides only part of the picture and why interviews with civilian and military officials provide crucial context pertaining to how policies are interpreted and carried out, with reference to the specificities of their work environment.

³⁸Fiona Mackay and Mona Lena Krook, *Gender, Politics and Institutions: Towards a Feminist Institutionalism*, 1st ed. 2011., Gender and Politics (Basingstoke ; Palgrave Macmillan, 2011), <https://doi.org/10.1057/9780230303911>; Louise Chappell, “‘New,’ ‘Old,’ and ‘Nested’ Institutions and Gender Justice Outcomes: A View from the International Criminal Court,” *Politics & Gender* 10, no. 4 (2014): 572–94, <https://doi.org/10.1017/S1743923X14000427>; Louise Chappell, “Conflicting Institutions and the Search for Gender Justice at the International Criminal Court,” *Political Research Quarterly* 67, no. 1 (2014): 183–96, <https://doi.org/10.1177/1065912913507633>; Meryl Kenny, *Gender and Political Recruitment: Theorizing Institutional Change*, 1st ed. 2013., Gender and Politics (New York: Palgrave Macmillan, 2013), <https://doi.org/10.1057/9781137271945>; Fiona Mackay, “Nested Newness, Institutional Innovation, and the Gendered Limits of Change,” *Politics & Gender* 10, no. 4 (December 2014): 549–71, <https://doi.org/10.1017/S1743923X14000415>; Georgina Waylen, “Informal Institutions, Institutional Change, and Gender Equality,” *Political Research Quarterly* 67, no. 1 (2014): 212–23, <https://doi.org/10.1177/1065912913510360>.

³⁹ Jennifer Thomson, “Resisting Gendered Change: Feminist Institutionalism and Critical Actors,” *International Political Science Review* 39, no. 2 (March 1, 2018): 178–91, <https://doi.org/10.1177/0192512116677844>.

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What sets this environment apart is NATO's integrated civil-military organizational structure. Indeed, there is a rich literature dedicated to how NATO members operate both nationally and within an alliance setting.⁴⁰ This literature often presents civil-military dynamics as a principal-agent relationship in which expressions of dissent or “shirking” by the military test the health of this core norm of civilian control over the armed forces.⁴¹ It helps uncover some gaps in understanding between civilian and military interpretations of common objectives, as well as mechanisms of delegated authority and some of the corresponding accountability challenges, which seem particularly acute on SEA. Described as “professionals in the management of violence,”⁴² this information asymmetry favours the military as it becomes possible for them to evade expectations about how they carry out their duties in operations if there is not sufficient oversight and monitoring from civilians. In sum, with the theoretical goal of explaining the emergence of NATO's SEA Policy, applying feminist institutionalism in a civil-military policy environment leads us to focus on a variety of actors, with different professional cultures and institutional levers, through the analysis of interviews, official documents and training materials.

⁴⁰Sarah E. Kreps, *Coalitions of Convenience: United States Military Interventions after the Cold War*. Oxford University Press, 2011; Oliver Schmitt, (2017). “International organization at war: NATO practices in the Afghan campaign.” *Cooperation and Conflict*, 52(4), 502-518. <https://doi.org/10.1177/0010836717701969>; Patrick A. Mello, and Stephen M. Saideman. “The Politics of Multinational Military Operations.” *Contemporary Security Policy* 40, no. 1 (January 2, 2019): 30–37. doi:10.1080/13523260.2018.1522737; Kathleen J. McInnis. *How and Why States Defect from Contemporary Military Coalitions*. Springer International Publishing, 2020; Marina E. Henke. (2019). *Constructing Allied Cooperation: Diplomacy, Payments, and Power in Multilateral Military Coalitions*. Cornell University Press, <https://doi.org/10.7591/9781501739705>; Stefano Recchia. (2015). *Reassuring the Reluctant Warriors: U.S. Civil-Military Relations and Multilateral Intervention*. Cornell University Press.

⁴¹ Peter D. Feaver. 2003. *Armed Servants: Agency, Oversight and Civil-Military Relations*. Harvard University Press; Risa Brooks and David Pion-Berlin, “Slow Rolls, Shoulder-Taps, and Coups: Building a Research Program in Military Dissent Across Regime Types, *Journal of Global Security Studies* 7, no. 4 (December 2022), <https://doi.org/10.1093/jogss/ogac026>

⁴² Samuel P. Huntington (1957). *The Soldier and the State: The Theory and Politics of Civil-Military Relations*. Harvard University Press.

See von Hlatky, S., & Nicol, W. (2025). Following the UN Lead? NATO's Contested Sexual Exploitation and Abuse Policy. *International Peacekeeping*, 32(5), 1001–1027.
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Research Design: Understanding SEA Policies, Training, and Practices

As a data collection and analysis strategy, and considering the fairly nascent nature of SEA policy and training development at NATO, we opted for a mixed-methods qualitative approach that consisted of primary material review and interviews. In accordance with our ethics clearance, interview data is kept anonymous to protect participants and to enable them to speak candidly about their experiences.⁴³ The primary material consisted of policy documents and training packages from NATO's SEA and gender-related curriculum, most notably the advanced distributed learning (ADL) SEA module and related modules, materials from the Nordic Centre for Gender in Military Operations (NCGM), the Education and Training Package on Gender Perspective for Nations and Gender in Terrorism Education and Training Package for Nations from the NATO Allied Command Transformation (ACT) Office of the Gender Advisor, as well as other supporting documents and materials. In total we reviewed six ADLs: ADL 069 Peacekeeping Techniques, ADL 168 Pre-Gender Advisor Course, ADL 169 Gender Perspective in Military Operations, ADL 171 Pre-Gender Focal Point, ADL 417 Identifying, Preventing and Responding to Sexual Exploitation and Abuse, and ADL 418 Gender Mainstreaming in Small Arms and Light Weapons Projects. We reviewed the two training packages for nations from the Office of the Gender Advisor,⁴⁴ NCGM's thematic analysis of the war in Ukraine⁴⁵ and their

⁴³ Queen's University Health Sciences & Affiliated Teaching Hospitals Research Ethics Board (HSREB) institutional review board (IRB) number: 00001173.

⁴⁴ *NATO ACT Office of the Gender Advisor - HQ SACT Office of The Gender Advisor | NATO's ACT (blog)*, <https://www.act.nato.int/about/gender-advisor/>, accessed December 2, 2023.

⁴⁵ *Nordic Centre for Gender in Military Operations - Thematic Analysis: The Use of Gender Perspective in the Conflict in Ukraine*, <https://www.forsvarsmakten.se/en/swedint/in-focus/ukraine-war-gender-analysis/>, accessed October 19, 2023.

See von Hlatky, S., & Nicol, W. (2025). Following the UN Lead? NATO's Contested Sexual Exploitation and Abuse Policy. *International Peacekeeping*, 32(5), 1001–1027.
<https://doi.org/10.1080/13533312.2025.2505492>

other main products constituting practical examples,⁴⁶ integrating a gender perspective,⁴⁷ guide to the WPS agenda,⁴⁸ and the cultural mediation and gender perspectives components to the Security Force Assistance (SFA) Operators Course. While we were not able to access the two-week long Gender Advisor (GENAD) course offered by NCGM, we did interview course students and facilitators.

These primary materials were analyzed using an attitudes-behaviour approach to learning which was specially adapted to a gender focus.⁴⁹ This framework places an emphasis on how training creates opportunities for learners to reflect on their own attitudes and beliefs toward

⁴⁶ *Nordic Centre for Gender in Military Operations - Whose Security? Practical Examples of Gender Perspectives in Military Operations*, 2015, https://www.forsvarsmakten.se/siteassets/english/swedint/engelska/swedint/nordic-centre-for-gender-in-military-operations/whose-security-2015-low-resolution.pdf?TSPD_101_R0=0840bf68c4ab20006fe321e82e3b2f557c703577295c80110e3beac85337e4d358728c42ba5d3ebe08c8200baf1430006ef89b48e311079fa8b6c83fb7feb3ca81efb0578ef3224a5a92753978693e5c82d966a58961c5eadd979d5756057fbf.

⁴⁷ *Nordic Centre for Gender in Military Operations - Integrating a Gender Perspective in Military Exercises*, 2021, https://www.forsvarsmakten.se/siteassets/english/swedint/engelska/swedint/nordic-centre-for-gender-in-military-operations/exercise_ncgm.pdf?TSPD_101_R0=0840bf68c4ab200063f657665b29d7ca0378ff2c6280e3dfdfbf6533bb0337a1385e25cc3906c388088fb2295814300036eff5f2dc92c7242eafd2b0fab68448d2f6993df2242df967e2ba5b6bd10a5590dbcc93c01f4b1b8bc3a58b3ee6aac0.

⁴⁸ *Nordic Centre for Gender in Military Operations - A Military Guide to the United Nations Security Council Resolution on Women, Peace, and Security*, April 2020, https://www.forsvarsmakten.se/siteassets/english/swedint/engelska/swedint/nordic-centre-for-gender-in-military-operations/mil-guide-unsr-wps.pdf?TSPD_101_R0=0840bf68c4ab20007e3c0dd20e8ff07fe776c1ac5f3db8d7d8f760c52711f1d7db4b31d90405fdf70800f75e5a143000d2508015ca4559ec4b45a60999fb1c7d5ee9e7555236a9dd7f201441b7b5217773f7775bb941bcb4b3f62da9a5472b25.

⁴⁹ For attitude-behavioural approaches and case studies where they have been applied to gender see, Doris Bartel (2018). *Training and Mentoring Community Facilitators to Lead Critical Reflection Groups for Preventing Violence Against Women*. The Prevention Collaborative; Alexa Hassink (2015). "Living Peace: From Conflict to Coping in Democratic Republic of Congo," *EMERGE Case Study 7*, Promundo-US, Sonke Gender Justice and the Institute of Development Studies; Van Leuven, Dallin & Mazurana, Dyan. (2016). *Protection of Civilians from Sexual and Gender-Based Violence (SGBV): Insights for African Union Peace Missions*; UN Women, "What Will It Take? Promoting Cultural Change to End Sexual Harassment," 2019, <https://www.unwomen.org/sites/default/files/Headquarters/Attachments/Sections/Library/Publications/2019/Discussion-paper-What-will-it-take-Promoting-cultural-change-to-end-sexual-harassment-en.pdf>; LOGiCA, "Living Peace Groups Implementation Manual and Final Project Report," 2014, <https://www.equimundo.org/wp-content/uploads/2014/12/Living-Peace-Groups-Implementation-Manual-and-Final-Project-Report.pdf>.

See von Hlatky, S., & Nicol, W. (2025). Following the UN Lead? NATO's Contested Sexual Exploitation and Abuse Policy. *International Peacekeeping*, 32(5), 1001–1027.
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gender tailored to the cultural contexts in which they operate. It places an emphasis on changing behaviours rather than just trying to influence attitudes toward sexual abuses, primarily by investigating the link between how beliefs are translated into actions. This framework therefore favours training that is interactive in how it engages the learner to think critically about gender norms rather than training which simply emphasizes compliance with a set of rules for sexual conduct. This is in line with our feminist institutionalist framework which is sensitive to informal “rules of the game” and how knowledge is shared and socialized organizationally, often reflecting gendered power relations within institutions. A full breakdown of this attitudes-behavioural approach is available as a supplementary file.

Materials were assessed on a three-point Likert scale with possible ascending scores of ‘minimal’, ‘partial’, or ‘comprehensive’. Materials that received a score of comprehensive would have unpacked the various aspects of SEA and distinguished it from sexual harassment, including examples of the power dynamics at play in SEA such as ‘girlfriends’ and transactional sex that make consent in these instances impossible. It considers how aspects of a person’s identity may put them at greater risk of SEA coupled with discriminatory norms while not simply presenting women as inherently weak and in need of men’s protection. Comprehensive materials are tailored to the cultural backgrounds of participants and the local context of the mission, providing space for self - and group-reflection regarding beliefs that may be used to justify SEA. It explores the larger consequences of SEA on building a sustainable peace by going beyond merely stressing compliance with codes of conduct to discuss the impact SEA has on victims, such as women who become pregnant by peacekeepers or the children born as a result. Finally, these comprehensive materials would have taken a rights-based approach to SEA by focusing on how it undermines the rights of victims, particularly vulnerable women and children who have a

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right to live free of SEA in the communities where peacekeepers operate. Materials that scored 'partial' would have had some but not all of these components, while materials that scored 'minimal' would have had few or none of these components.

To complete the analytical picture, we also drew on interviews with more than a dozen personnel from NATO, all of whom were stakeholders that have relevant expertise or work in roles related to the organization's SEA Policy. These individuals were identified using the snowball method, as most participants were willing to recommend additional individuals to interview. The majority of participants in our interviews were women and interviews were conducted from February to December of 2023. In the NATO ecosystem we targeted individuals who participated in SEA policy development or training. This included individuals associated with NCGM, the Human Security Unit, national militaries within NATO, Allied Command Transformation (ACT), and individuals from external organizations who provide training to NATO personnel. We also interviewed students who undertook the training and people responsible for human resource matters pertaining to SEA in NATO, to better understand how knowledge on SEA was being interpreted and discussed. Finally, we interviewed people with key NATO roles for SEA, who were able to speak to how cooperation and coordination on SEA policy and training occur. This mixed discursive and qualitative content analysis allowed us to understand how SEA is adopted and interpreted within NATO as evidenced by the officials directly involved in policy adoption and dissemination, including the development and delivery of training materials.

We reflect on our positionality by recognizing that we are reliant on our interview participants' interpretation of developments pertaining to NATO's SEA Policy. As civilian researchers external to NATO, we acknowledge that how individuals within the organization

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view policy developments may differ from individuals outside of the organization. However, understanding these perspectives are worthwhile in their own right if only to understand how NATO stakeholders view the issue of SEA. As a practical matter, external researchers do not enjoy access to all of NATO's internal processes, therefore what access we did gain to training and participants in this article still fills an empirical gap which has not been detailed elsewhere in the literature to date. Finally, and with the above caution in mind, there is sufficient scholarly literature where authors have practitioner backgrounds, and they do not offer accounts that significantly contradict our analysis or findings.

Why and How NATO Added an SEA Policy

As highlighted in the introductory section, it can be difficult to explain why NATO adopted its SEA Policy in an institutional environment that was resistant, combined with the absence of external pressure and scrutiny, as was the case with the UN. When looking at the civil-military dynamics at NATO, the path to adopting an SEA policy was decidedly civilian-driven, as advanced by the Secretary-General's Special Representative for WPS, who happened to have extensive UN experience as a point of reference. Below, we discuss potential explanations for why and how SEA policy development evolved the way it did, and we also offer some recommendations on the way forward at NATO and beyond to improve SEA policies and training approaches.

Our inquiry started with NATO member NAPs on WPS, as we expected member states to outline SEA-specific objectives as part of their domestic frameworks on WPS, which could then influence SEA policy development at NATO. The argument here is that like-minded states could advance NATO-level initiatives tied to SEA. And indeed, we found that most NATO countries

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have national action plans on WPS, many of which specifically reference SEA.⁵⁰ With the accession of Sweden to NATO in 2024, the now 32-member bloc has near universal adoption of NAPs with the exceptions of Hungary and Turkey. Of the 30 countries that do have NAPs, more than half made specific commitments to combating SEA in international peacekeeping operations.⁵¹ Even for those countries which did not discuss SEA perpetrated by peacekeepers specifically, the majority still committed to fighting sexual violence more broadly and bringing perpetrators to justice by eliminating a sense of impunity for sexual crimes. Many of these NAP commitments pre-date NATO's 2019 SEA Policy, demonstrating that there was already significant momentum within most NATO member states to prevent and respond to peacekeeper-perpetrated SEA.

While we found evidence that NATO policies, including on SEA, have influenced policy development at the national level for certain NATO countries (especially late adopters of WPS NAPs), we did not find compelling evidence to suggest that member states were the driving force behind NATO's adoption of the SEA Policy. Rather, the near universal adoption of WPS NAPs created a permissive policy environment for the Special Representative on Women, Peace, and Security to advocate for change. Arguably, Clare Hutchinson's decade-long career at the UN likely played a role in identifying the adoption of an SEA Policy as a strategic priority for her 3-year term. Indeed, while member state support was crucial for any momentum on the adoption of an SEA Policy, the Special Representative on WPS at the time, Clare Hutchinson, took the initiative to put the issue on the table rather than any individual or group of member states, though she actively solicited their support and sponsorship. Still, some states were recalcitrant

⁵⁰ As shown in appendix.

⁵¹ Ibid.

See von Hlatky, S., & Nicol, W. (2025). Following the UN Lead? NATO's Contested Sexual Exploitation and Abuse Policy. *International Peacekeeping*, 32(5), 1001–1027.
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despite having national WPS commitments; one interview participant told us that the SEA Policy was initially seen as too “UN-ey,” and that this was not an issue member states necessarily wanted to raise at NATO.⁵²

It is important to acknowledge that NATO was not starting from scratch, given the policy inspiration it drew from the UN on WPS. Namely, NATO has adopted the same zero-tolerance approach for SEA as the UN, and reaffirms in its 2019 Policy that all allies associate themselves with the existing UN policies on SEA.⁵³ While the UN's experience (and response to) SEA certainly had an influence on the development of the NATO SEA Policy, we contend the level of influence has not carried over to the implementation of the policy. This is logical since there are notable differences in their mandate and trajectories. The UN has more experience with large-scale international peacekeeping operations than NATO, and the UN has publicly struggled with the issue of SEA over the last two decades, having first adopted its zero-tolerance policy for SEA in 2003 in response to abuses by aid workers in West Africa.⁵⁴ A decade later in 2013 a UN report proclaimed that SEA still posed ‘the most significant risk to UN peacekeeping missions’.⁵⁵ One notable BBC documentary also detailed the retaliation whistleblowers have experienced for exposing sexual crimes in the organization.⁵⁶ This high level of exposure has put immense pressure on the UN to grapple with SEA, a level of public awareness that has not gone unnoticed by those responsible for NATO's SEA Policy. As one trainer pointed out:

⁵² Virtual interview with NATO official, 20 December 2023.

⁵³ *NATO - The NATO Policy on Preventing and Responding to Sexual Exploitation and Abuse*, http://www.nato.int/cps/en/natohq/official_texts_173038.htm, accessed August 16, 2023.

⁵⁴ *United Nations Secretariat - Secretary-General's Bulletin: Special Measures for Protection from Sexual Exploitation and Sexual Abuse*, October 9, 2003, <https://documents-dds-ny.un.org/doc/UNDOC/GEN/N03/550/40/PDF/N0355040.pdf?OpenElement>

⁵⁵ Awori, Lutz, and Thapa, *Final Report: Expert Mission to Evaluate Risks to SEA Prevention Efforts*, p. 1.

⁵⁶ Ben Steele, *The Whistleblowers: Inside the UN*, BBC, 2022, <https://www.bbc.co.uk/programmes/m0018ljw>.

See von Hlatky, S., & Nicol, W. (2025). Following the UN Lead? NATO's Contested Sexual Exploitation and Abuse Policy. *International Peacekeeping*, 32(5), 1001–1027.
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NATO faces the same issues than the UN and when they decided in 2018 to have an SEA policy, it was easy because they almost copy/paste the UN one. You can see zero-tolerance reference. We are seeing a bit of pushback from nations, just like we saw at the UN.⁵⁷

Prioritizing the development of an SEA policy at NATO was thus contentious given that there was no public scrutiny or pressure on officials to strengthen oversight, general reluctance on behalf of some military personnel to take SEA and gender-sensitive training seriously, and the perception that SEA was a UN, not a NATO problem. Some NATO officials underscored that in the absence of scandal, there was little motivation for change: “Until something bad happens (news, if it blows up in our face), that’s when it will be taken seriously. But ADL [NATO online training] is not sufficient if we want to prevent headlines.”⁵⁸ There is evidence of incidents in certain NATO operational contexts, however, even if those incidents have not garnered widespread attention: “We have heard about KFOR soldiers committing abuses but not to the same extent as the UN. In the mind of the decisionmakers at NATO, and NATO personnel, [SEA] was a UN issue, not a NATO issue.”⁵⁹ Still, the reputational risk alone seems part of the way NATO justifies the SEA Policy to member states. Accordingly, the training materials “put a big consequence on NATO’s reputation (also on victims), on perpetrators.”⁶⁰

Unlike CRSV which is outward facing, looking at the conduct of the warring factions in an armed conflict, there were concerns that SEA was overly scrutinizing NATO’s own troops. To demonstrate how contested the SEA Policy was in comparison to CRSV, one interview participant told us: “CRSV was much easier because it was outward looking at the ‘bad people out there,’ SEA was looking inward.”⁶¹ In our interviews we heard of many instances where

⁵⁷ Virtual interview with NATO official, 5 April 2023.

⁵⁸ Virtual interview with NATO official, 16 February 2023.

⁵⁹ Virtual interview with NATO official, 5 April 2023.

⁶⁰ Virtual interview with NATO official, 22 March 2023.

⁶¹ Virtual interview with NATO official, December 23, 2023.

See von Hlatky, S., & Nicol, W. (2025). Following the UN Lead? NATO's Contested Sexual Exploitation and Abuse Policy. *International Peacekeeping*, 32(5), 1001–1027.
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officials and SEA trainers had encountered resistance from NATO military personnel when trying to advance the SEA Policy and in delivering their trainings. As one trainer explained:

When it comes to serious sexual topics, the reaction from the military is that it is wrong, but there's always a little glimmer of 'that's not our job'... sometimes the training is simply to get the men in charge to see women as human and to be less horrible to the women they work with.⁶²

This dismissive attitude was even displayed by member states with a track record of supporting SEA in the past: “surprisingly the nations that were supportive in the UN [of an SEA policy] were not supportive in NATO. There was a feeling that it wasn't really necessary in NATO, and that many NATO members had their own policies’.”⁶³ Similarly, when it comes to justifying the need for an SEA policy in training, one facilitator told us that “people are still asking why we are reporting if there's no problem?”⁶⁴ In this context it becomes clear that SEA was simply not perceived as a NATO problem, and as such it was an obstacle in implementing the policy with the military and continues to be an obstacle in ongoing trainings.

When it comes to implementation, there is merit to the claim that the NATO approach is significantly different. The UN is a much larger organization dedicated to the protection of civilians and the advancement of human rights globally. Its peacekeepers hail from countries all around the world representing diverse cultures, regime types, and levels of military proficiency. NATO by contrast is a smaller military alliance dedicated to the collective defence of its 32 member states in the North Atlantic area which share similar values and systems of democratic governance. As such, SEA threatens the very *raison d'être* of the UN, whereas NATO may be

⁶² Virtual interview with NATO official, March 3, 2023.

⁶³ Virtual interview with NATO official, December 23, 2023.

⁶⁴ Virtual interview with NATO official, April 5, 2023.

See von Hlatky, S., & Nicol, W. (2025). Following the UN Lead? NATO's Contested Sexual Exploitation and Abuse Policy. *International Peacekeeping*, 32(5), 1001–1027.
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more likely to view SEA through the prism of military preparedness and operational effectiveness. These institutional differences become evident in how NATO tries to address SEA:

UN tried naming and shaming; financial leverage (preventing people from one country to be sent again because of allegations, depriving them from UN funding for the military – for some countries it is a big incentive, but not for NATO because the funding mechanism is different). Naming and shaming would be a good way... but the NATO motto is: 'we stand united'.⁶⁵

As a military alliance, NATO must be cognizant of how their SEA Policy may undermine their unity and, by extension, their core focus on collective defence. Russia, for example, has previously tried to use fabricated allegations of sexual violence involving NATO personnel to discredit and undermine the alliance in disinformation campaigns.⁶⁶ The threats NATO perceives from SEA may thus be conceptually different than the UN, though both organizations share the overarching reputational concerns.

Despite their institutional differences, both the UN and NATO seem to experience the same fundamental difficulty in operationalizing their SEA policies; ultimately, member states have jurisdiction over their troops as part of multinational missions. At the time of our interviews, NATO had yet to develop a reporting mechanism for its 2019 SEA Policy:

NATO's attitude focused on prevention and raising awareness, but no detail on response. Now, an action plan, we are fighting about one item: response and reporting mechanism. We are facing the same question as the UN did almost eight years ago. Who has to report? What training? How should the report be drafted, with standardized form? How is info conveyed to upper level? Do we need info on substantiation? Comms with nation? Follow up? Can we send back a soldier to their country when incidents happen in operation?⁶⁷

⁶⁵ Virtual interview with NATO official, 5 April 2023.

⁶⁶ Eric Schmitt, "In Eastern Europe, U.S. Military Girds Against Russian Might and Manipulation," *The New York Times*, June 27, 2018, sec. U.S., <https://www.nytimes.com/2018/06/27/us/politics/american-allies-russia-baltics-poland-hybrid-warfare.html>.

⁶⁷ Virtual interview with NATO official, 5 April 2023.

See von Hlatky, S., & Nicol, W. (2025). Following the UN Lead? NATO's Contested Sexual Exploitation and Abuse Policy. *International Peacekeeping*, 32(5), 1001–1027.
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NATO lacks both the financial levers and ability to name and shame outliers like the UN can for fear of undermining alliance unity. Nonetheless, slightly more than half of NATO members have proactively committed to tackling SEA in their own NAPs, with many of those countries vowing to fully prosecute any substantiated claims made against their own troops. This national commitment is essential given that instances of SEA by military personnel operating under a NATO banner would be referred to their national chain of command. Counter-intuitively, this jurisdictional point fueled initial and ongoing resistance to the NATO SEA Policy and training, which was perceived as encroachment by some member states.

With a better understanding of these dynamics of organizational resistance, the adoption of the SEA Policy is of course a key milestone in its own right, and set the course for NATO's civil-military structure to translate the content of the policy into military guidance, institutionalize change with mandatory training, procedures for ensuring leadership accountability, and reporting processes. Somewhat ironically, given what has been well established in the literature on militarized masculinities and feminist institutionalism, NATO and the military as an institution can be important vehicles for advancing the topic of SEA and for creating clear lines of responsibility to affect its advancement. When not at war, the military spends most of its time training and preparing for future deployments. This means that militaries are essentially training machines that can mandate their troops to train on a topic such as SEA, a powerful and streamlined way to disseminate knowledge to a broad audience.⁶⁸ Given the hierarchal nature of militaries and the chain of command, leadership priorities get done. As one trainer noted:

One thing that works is to make it mandatory. The basic (ADL 169), everyone has to do it. Max 3 months upon arrival. We are drafting a COS [Chief of Staff] order to make SEA

⁶⁸ NATO has been described as a “teaching machine” by Cynthia Enloe, as explained in Katharine AM Wright, “NATO’S Adoption of UNSCR 1325 on Women, Peace and Security: Making the Agenda a Reality,” *International Political Science Review* 37, no. 3 (2016): 350–61, <https://doi.org/10.1177/0192512116638763>.

See von Hlatky, S., & Nicol, W. (2025). Following the UN Lead? NATO's Contested Sexual Exploitation and Abuse Policy. *International Peacekeeping*, 32(5), 1001–1027.
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training mandatory; same conditions would apply. Especially with military, if they don't want to do it, you order it.⁶⁹

Civilian oversight can steer the institutionalization of the SEA Policy, to make sure that the military enacts the orders and directives they are given. Yet at NATO, there is contradictory evidence that leadership has taken SEA seriously. For example, one trainer noted that getting leadership onboard was a work in progress: "I can gladly say NATO leadership see the potential of this, starting to invest, trust. Long way to go still, especially with SEA. We're on it, at least. Very aware of the gaps. But trying to address it."⁷⁰ Leadership support must also be sustained long enough for SEA policies to become entrenched. Training reflects this, its effective implementation relies on leadership support and the commitment of resources. As one GENAD conversely noted: "In my encounters, the two biggest problems are resource issues (too few GENADs with tasks) and also leadership support".⁷¹

Similarly, there is a lack of familiarity in the military about GENADs who do work on SEA and WPS within NATO. Unlike the rest of their colleagues, GENADs sometimes feel that "there is no professionalization of this position; it is supposed to be at same level as a LEGAD/POLAD."⁷² They know what to do. GENAD: never seen a GENAD until I got here and, oh, it was me."⁷³ This highlights that clear lines of accountability are also crucial; without the same professionalization or recognition of what GENADs do, it is easy for topics like SEA and WPS to fall by the wayside. It is well and good that NATO has declared SEA and WPS to be priorities in principle, but without sufficient leadership support in practice they risk becoming

⁶⁹ Virtual interview with NATO official, 22 March 2023.

⁷⁰ Virtual interview with NATO official, 22 March 2023.

⁷¹ Virtual interview with NATO official, 21 June 2023.

⁷² LEGAD is the acronym used to refer to a legal advisor. POLAD is the acronym used to refer to a political advisor.

⁷³ Virtual interview with NATO Official, 16 February 2023.

See von Hlatky, S., & Nicol, W. (2025). Following the UN Lead? NATO's Contested Sexual Exploitation and Abuse Policy. *International Peacekeeping*, 32(5), 1001–1027.
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‘check-in-the-box’ exercises. As one trainer attests, referencing experiences in Iraq and Kosovo: “Even the enforcement of that training is difficult to do. A lot show up with bare minimum training and then the GENAD develops training at the mission level. All training is in English, the vocab is new to them.”⁷⁴ While the adoption of the SEA Policy has led to a degree of institutionalization, awareness remains low across the organization and successful implementation also relies on the will and persuasiveness of individuals. As one interviewee noted, “It is also very personality driven. There are different levels of proactiveness.”⁷⁵ Both on the civilian and military sides of the house, then, the reliance on committed individuals and groups points to serious accountability challenges and the need to tighten civilian oversight on SEA to address the gaps in implementation.

Finally, and as our main competing explanation, we have to engage with the idea that the war in Ukraine may have upended policy and training development on SEA, given that peacekeeping seems to be fading into the background as deterrence and collective defence are back to the fore. Interestingly, while we acknowledge the renewed priority of deterrence, we also find evidence to show that the SEA Policy, and more prominently, CRSV, have been discussed in the context of NATO's support for Ukraine. This intersection between human security and conventional warfare should not be surprising. The atrocities and war crimes committed by Russian forces that have thus far been documented by a UN inquiry include rapes, castrations, summary executions, population transfers with the abduction and deportation of Ukrainian children to Russia, systematic and widespread torture, the bombing of civilian infrastructure such as hospitals, schools, and residential buildings, and widespread sexual violence meant to emasculate and

⁷⁴ Virtual interview with NATO official, 16 February 2023.

⁷⁵ Virtual interview with NATO official, 16 February 2023.

See von Hlatky, S., & Nicol, W. (2025). Following the UN Lead? NATO's Contested Sexual Exploitation and Abuse Policy. *International Peacekeeping*, 32(5), 1001–1027.
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humiliate victims by abusing their genitals and often forcing family members to watch.⁷⁶ These shocking crimes have invited international attention and outrage, but within NATO perhaps it has brought a renewed focus on taking SEA and WPS seriously. Those who work on these issues within NATO have noted this effect:

It is a shame it has taken a war to understand why this is a real threat. Forced deportation of children, SGBV [sexual and gender-based violence]. This is eye opening for a lot of people in the news. If anything, some of the leadership and the public are taking this topic a bit more seriously. And for us, we have a lot of tangible examples to prove how gender perspectives can provide good overview of the battlefield.⁷⁷

Another official noted that: ‘When Ukraine happened, in this context, people realized there could be CRSV, there could be SEA deployed on the Eastern flank.’⁷⁸

There are differing motivations for member states to advance SEA and WPS-related policies and practices in NATO - some states hope to integrate themselves further into the alliance by aligning more closely with its shared values, while other states may see SEA and WPS as an avenue to contribute their expertise and gain greater recognition in an alliance context. Most member states, however, are probably not tracking these developments closely. As one interviewee noted, “even if NATO has policies, they are not as binding as we’d want them to be. Normally the training is a national responsibility within NATO.”⁷⁹ As we argue in this article, this tension between national and alliance-level responsibilities make it difficult to standardize SEA prevention practices across the alliance.

⁷⁶ United Nations Human Rights Council - *Independent International Commission of Inquiry on Ukraine*, <https://www.ohchr.org/en/hr-bodies/hrc/iicihr-ukraine/index>, accessed September 2023.

⁷⁷ Virtual interview with NATO official, 22 March 2023.

⁷⁸ Virtual interview with NATO official, 5 April 2023.

⁷⁹ Virtual interview with NATO official, 5 April 2023.

See von Hlatky, S., & Nicol, W. (2025). Following the UN Lead? NATO's Contested Sexual Exploitation and Abuse Policy. *International Peacekeeping*, 32(5), 1001–1027.
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Implementation Challenges

While our research has identified some positive aspects of NATO's SEA Policy since being adopted in 2019, our interviews with NATO officials and NCGM staff highlighted a number of challenges, which we will address in this section. The first one relates to the clarity of the policy approach and terminology used. Our interviewees noted some confusion over the use of certain terminology, which can lead to challenges when it comes to identifying and reporting instances of SEA, ultimately affecting compliance. As one official noted: "I wish the policy was more specific, more direct in its examples. Even our J9 section [Civil-Military Cooperation], they even believe that it is an HR issue (harassment)."⁸⁰ Confusion over terminology hampers implementation at every turn and can only partly be countered by well-designed training.

Another point relates to knowledge being lost in transition, given the high turnover of personnel at NATO: "civilian staff rotates also, but military staff they rotate every three years. If your supervisor is military, sometimes he is aware of HR. Sometimes they are not."⁸¹ This means that continuity is not a given. This challenge points to the importance of institutionalization, which relies on having clear policy guidance, resources to support its socialization and dissemination (e.g. training), as well as well-defined structure of accountability within NATO's civil-military structure.

One of the criticisms of zero-tolerance policies is that SEA becomes a "problem of rules"⁸² in which gender training for peacekeepers is simply a technocratic fix.⁸³ NATO has at least partially addressed this implementation challenge through its approach to training. One of

⁸⁰ Virtual Interview with NATO Official, 16 February 2023.

⁸¹ Virtual Interview with NATO Official, 28 February 2023.

⁸² Jasmine-Kim Westendorf, "A PROBLEM of RULES: Sexual Exploitation and UN Legitimacy," *International Studies Quarterly* 67, no. 3 (2023), <https://doi.org/10.1093/isq/sqad046>.

⁸³ Westendorf and Searle, "Sexual Exploitation and Abuse in Peace Operations."

See von Hlatky, S., & Nicol, W. (2025). Following the UN Lead? NATO's Contested Sexual Exploitation and Abuse Policy. *International Peacekeeping*, 32(5), 1001–1027.
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the strengths we identified is that addressing resistance is baked into the design of the course to better challenge attitudes and behaviours. Compared to UN training, NATO training spends less time stressing the various SEA-related policies and resolutions to instead focus on the cultural or underlying reasons SEA may occur. It also provides more scenarios based on moral dilemmas as examples that allow for internal conflict and hesitation when reporting SEA. In one scenario a NATO employee is reluctant to report SEA for fear of retaliation since the accused is higher in their chain of command, and the accused does in fact try to retaliate against the suspected witness after they report. Facing these internal dilemmas head-on brings more realistic nuance to the NATO training while not taking for granted that everyone on mission will always adhere to the codes of conduct, showing a more active approach to oversight by explicitly acknowledging that military agents may try to shirk their responsibilities. We were able to observe empirically therefore that NATO's training has identified and addresses underlying beliefs and attitudes that could hinder compliance with the Policy, in addition to including a broader range of practical examples that incentivize critical thinking about gender, while allowing for the possibility that military agents may try to evade established reporting mechanisms. These trainings are made mandatory within months of arrival for all personnel, streamlining it across multinational contingents, which helps with institutionalization in a context where staff and personnel turnover is high, as previously identified.

Finally, some GENADs we interviewed talked about not feeling adequately prepared to take on the role after just two weeks of training when they had no previous experience with SEA as a topic. 'It is the most challenging job I have ever had. You have to be an expert after a 2-week

See von Hlatky, S., & Nicol, W. (2025). Following the UN Lead? NATO's Contested Sexual Exploitation and Abuse Policy. *International Peacekeeping*, 32(5), 1001–1027.
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course. Then apply it in the HQ you don't know. Also, language is not that easy.'⁸⁴ This dual challenge about adequate training and the professionalization of GENADs has been well established in the literature. For these positions, when you are expected to be an expert, a two-week course is insufficient, and this gap is not always filled by training requirements at the national level. On the more positive front, NATO's training apparatus is able to provide baseline knowledge to its member states and to propose a standardized approach to SEA, which can move the needle for states who have inadequate policies or trainings back home:

We can see at Norfolk [Allied Command Transformation, or ACT], that the level of knowledge in this area is not equal. The challenge with 30+ nations, different backgrounds, is that it is so hard to have an equal starting point for everyone. We [NATO ACT] will help a bit, even if it is their responsibility.⁸⁵

In sum, what NATO's mandatory training packages provide is harmonized knowledge and practices (at a basic level), rather than expertise.

Conclusion

In this article we sought to understand why NATO chose to pursue an SEA Policy as part of its WPS framework. We argued that, while there is important momentum at the national level to prevent and respond to SEA, the decisive factor was the civilian policy push of the Secretary-General's Special Representative for Women, Peace, and Security. In our interviews, officials conceded to us that the process took two years and was an uphill battle as many in the NATO context refused to see this as a problem that applies to NATO.⁸⁶ Indeed, our analysis of the

⁸⁴ Virtual interview with NATO official, 13 February 2023.

⁸⁵ Virtual interview with NATO Official, 13 February 2023.

⁸⁶ Virtual interview with former NATO official, 20 December 2023.

See von Hlatky, S., & Nicol, W. (2025). Following the UN Lead? NATO's Contested Sexual Exploitation and Abuse Policy. *International Peacekeeping*, 32(5), 1001–1027.
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interviews, as well as of the policy and training materials, reveals some degree of institutionalization, but also important sources of organizational resistance to the SEA Policy.

In particular, NATO's training provides some tangible evidence of civil-military contestation over its SEA Policy, and adaptation to some of these challenges. The specific challenges of engaging predominantly male military personnel in training relating to gender that is often equated with feminine vulnerability has been recognized by scholars and trainers alike.⁸⁷ However, the material that NATO has produced shows that trainers employ strategies to challenge ideas of who is vulnerable to SEA which may upend patriarchal stereotypes.

Given its contentiousness, the NATO SEA Policy is an example of relatively intense civil-military contestation, dynamics which will be familiar to officials tasked with implementing the WPS agenda. While NATO's SEA Policy and supporting training materials are promising, our interviews and findings lead to tangible recommendations, while acknowledging that the policy, legal, and training aspects are in flux. First, we identified in our research that NATO's approach to training was conducive to fostering attitudinal change in participants, which we view as an important feature to build on. Some of the NATO trainings offer in-person, more interactive courses, which can sometimes lead to more overt manifestations of resistance, but this presents an opportunity for more active engagement that can be more impactful. Indeed, training development officers continuously referenced the need to get buy-in from military audiences as motivating the way the content was designed. In other words, the training package is not only about pushing content, it is about tackling expected resistance head on. Therefore, we would recommend that, compared to more passive approaches to training, critical engagement with the

⁸⁷ Holvikivi, "Training the Troops on Gender."

See von Hlatky, S., & Nicol, W. (2025). Following the UN Lead? NATO's Contested Sexual Exploitation and Abuse Policy. *International Peacekeeping*, 32(5), 1001–1027.
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material in an in-person setting is more effective to demonstrate the important nature of an organization's commitments to prevent SEA.

Second, even if the NATO SEA Policy was another important step in the more comprehensive articulation of the Alliance's commitment to the Women, Peace, and Security agenda, NATO is limited in the extent to which it can enforce its policy standards with individual member states. NATO can only exercise tighter oversight through regular reporting and monitoring mechanisms, overseen by ACT, even if there is no NATO responsibility in terms of investigation, prosecution, and retribution. To make sure this oversight is sustained, we recommend a regular and fixed cycle for reviewing the SEA Policy and updating the corresponding action and implementation plans. We would suggest that this exercise take place every 5 years, so that the policy tools can responsively adapt, and address identified gaps.

Finally, and reflective of the persistent calls for the professionalization of the GENAD role, we recommend that the NCGM be given appropriate status as a NATO Centre of Excellence on WPS, which will boost training capacity, funding, and staff resources, as well as standing within the NATO institutional structure. Considering Sweden's formal accession to NATO in 2024, the pathway for this recognition should be straightforward procedurally, if not politically.

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Appendix

NATO Member	SEA-Specific Commitments in NAP	Years Active (Most Recent NAP Available)
Albania	Commits to raise awareness of SEA in other countries, however does not mention peacekeeping specifically (p. 22).	2018
Belgium	Commits to implementing the NATO and UN codes of conduct regarding sexual violence in peacekeeping specifically and commits to prosecuting guilty persons for exploitation (p. 20).	2017-2021
Bulgaria	Specifically commits to ending SEA in post-conflict situations (p. 24)	2020-2025
Canada	Specifically commits to ending SEA perpetrated by peacekeepers and in humanitarian settings by holding perpetrators to account (p. 29).	2023-2029
Croatia	Specifically commits to ending SEA in accordance with the <i>Voluntary Compact on Preventing and Addressing SEA</i> signed between the UN and Croatia (p. 16).	2019-2023
Czechia	Commits to combatting sexual exploitation and trafficking, however unclear about peacekeeping specifically (p. 26).	2017-2020
Denmark	Specifically commits to ending SEA perpetrated by peacekeepers (p. 24-25)	2020-2024
Estonia	Mentions SEA in peacekeeping but no specific action plan	2020-2025

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	commitment on peacekeeper SEA follows (p. 2)	
Finland	Zero-tolerance policy for SEA and commits to investigating and prosecuting cases by Finns deployed to international organizations (p. 53)	2023-2027
France	Does not mention peacekeeper SEA specifically, but does commit to ending impunity for sexual crimes in post-conflict situations, supporting the zero-tolerance policies in international organizations, and prosecuting perpetrators of sexual violence (p. 16)	2021-2025
Germany	Specifically commits to peacekeeper SEA prevention and prosecution of perpetrators (p. 19)	2021-2024
Greece	Mentions UNSCR 2272 on SEA and states Greek personnel are expected to adhere to codes of conduct, but no further peacekeeper-specific action.	2023-2028
Hungary	No NAP	
Iceland	References the UN SEA Policy and broadly commits to being a voice in NATO and the UN in combatting sexual violence, but no peacekeeper SEA-specific activity follows (p. 4).	2018-2022
Italy	Specifically commits to ending SEA in peacekeeping (p. 19-20).	2020-2024
Latvia	SEA perpetrated by peacekeepers not mentioned.	2020-2025
Lithuania	Commits to informing soldiers and staff on SEA (€1000/year to publish information within the defence ministry) (p. 5)	2020-2024
Luxembourg	Specifically commits to ending SEA and has signed the Voluntary Compact on Preventing and Addressing SEA,	2018-2023

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	making significant contributions on this file (p. 13).	
Montenegro	Commits to educating peacekeeping personnel on UNSCR 1325 and accompanying resolutions on human rights and violence against women; adopts the reporting of SEA cases in peacekeeping as an indicator (p. 6 and 18).	2017-2018
Netherlands	Commits to prosecuting SEA in international peacekeeping by taking a rights-based approach (p. 27-28).	2021-2025
North Macedonia	Mentions SEA as an issue that has been addressed in other gender policies and does not discuss SEA in the NAP or in relation to international peacekeeping (p. 6).	2013-2015
Norway	Specifically states that SEA in UN peacekeeping is of concern, undermines the legitimacy of the UN, and is an obstacle to achieving operational goals. Commits to holding Norwegians accountable and training personnel on SEA (p. 16-17, 19)	2023-2030
Poland	Specifically commits to combatting SEA in peacekeeping and has lobbied the Security Council to include sexual violence as a condition for applying restrictions imposed by sanction regimes to their perpetrators (p. 25-26)	2018-2023
Portugal	SEA perpetrated by peacekeepers not mentioned.	2019-2022
Romania	Plans to create a standard operating procedure to develop a response mechanism for SEA perpetrated by Romanian personnel deployed abroad, but no specifics or commitment on accountability and no additional	2020-2023

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	resources are dedicated to this action (p. 19).	
Slovakia	SEA perpetrated by peacekeepers not mentioned/no specific action for SEA in peacekeeping.	2021-2025
Slovenia	Specifically commits to combatting SEA by peacekeepers through education and training at NCGM (p. 15-16)	2018-2020
Spain	Commits to combatting SEA by deploying more women to peacekeeping operations, repatriating any members of its missions accused of SEA to be tried by a Spanish court within 6 months, and supports the zero-tolerance UN policy (p. 33).	2017-2023
Sweden	Specifically commits to combatting SEA in UN peacekeeping and raising the profile of the issue by encouraging whistleblowers and promoting their protection (p. 19-20).	2016-2020
Turkey	No NAP	
United Kingdom	Specifically commits to accountability and zero tolerance for SEA across the armed forces, including training for peacekeepers (p. 40).	2023-2027
United States	Specifically commits to helping partner countries train their peacekeeping forces on SEA, holding perpetrators to account, and has multiple efforts on preventing and responding to SEA (p. 13, 19, 25-26).	2023

= Good: NAP specifically commits to combatting SEA in the context of international peacekeeping

= Moderate: NAP mentions forms of SEA but not specifically in the context of combatting it in international peacekeeping OR commitment is unclear regarding SEA

= Poor: NAP may broadly discuss sexual violence but does not discuss SEA by peacekeepers

= No NAP

Sources (taken from most recent NAP available):

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