

U4 Helpdesk Answer

U4 Helpdesk Answer 2024:1

Corruption and anti- corruption in Yemen.

Yemen's ongoing conflict has transformed into an economic battle, with various factions fighting over crucial resources, such as aid flows and control over state resources. The war economy has intensified existing corruption challenges and created avenues for illicit wealth accumulation for new powerbrokers and previously less powerful networks. However, this takeover of the state has not fundamentally changed the nature of the systematic corruption that has plagued Yemen long before 2014.

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Please provide an overview of corruption and anti-corruption in Yemen.

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Background

Understanding Yemen's turmoil requires acknowledging its intricate historical context, the internal failings of its governance system, and the significant external interventions that shaped its

¹ Zaidism is a sect of Shia Islam, which diverges from other types of Shiism in its theology around Imamate and is often considered closest to Sunnism.

MAIN POINTS

- Conflict and corruption in Yemen have reinforced each other.
- The war economy has led to a more fragmented economic landscape and the expansion of opportunities for gatekeepers to extract wealth through corrupt means and in the illicit economy. In other areas it has fueled pre-existing corruption challenges.
- While the armed conflict in Yemen may have disrupted some corrupt networks, it should not be assumed that it has fundamentally changed the preexisting nature of state capture and corruption in the country.
- While the legal framework has some key strengths, there is no evidence that the regulatory system has the capacity to adequately hold actors accountable for acts of corruption.

current state. This multifaceted conflict has led to a devastating humanitarian crisis, affecting millions of Yemeni civilians, and necessitating urgent international attention and efforts for peace and stability.

Yemen's conflict is deeply rooted in a complex history, reflecting long-standing political, cultural, and religious divides, particularly between its northern and southern regions. The north of Yemen was governed by a unique Zaidi¹ Shia theocracy, a tradition originating from the Ottoman Empire and into the 20th century, forming an

independent kingdom led by a Shia Imam until the 1960s (Dunn 1994). After a civil war between supporters of the Imam and a modernising coalition from 1962 to 1970, north Yemen, the Yemen Arab Republic, was often described as a ‘tribal republic’. While the northern government was secular, the Imamate had concentrated political and economic resources with the Zaydi highland tribes². Tribalism then persisted in the region due to geographic difficulties and instability in Sana’a (Salmoni et al. 2010: 20). The northern highlands evolved into a self-regulating environment largely beyond the central government’s control, perpetuating the sense of northern autonomy (Salmoni et al. 2010: 20)

In contrast, the south fell under the British sphere of influence from the 1830s. Britain directly ruled Aden and established a ‘Protectorate’ covering most of the rest of southern Yemen—a system of indirect rule through treaties which independently evolved into a federation of sultanates. An anti-colonial uprising in the 1960s resulted in the establishment of a Marxist republic in 1970 (Salmoni et al. 2010). This divergence in the ruling elites and their different governing systems and ideologies led the north and south down different trajectories (Dunn 1994). The embrace of economic planning in the south weakened traditional political practices and centralised power with the ruling party (Dunn 1994).

The unification of Yemen in 1990 was fraught with challenges. Shortly after unification, the newly established Republic of Yemen grappled with power imbalances and disagreements over

governance and divisions of resources. Northern dominance led to disenchantment in the south, culminating in a civil war in 1994. This conflict deepened the north-south divide, exacerbated economic disparities, and heightened discontent (Dunn 1994).

In the 2000s, in the south, Al-Hirak (the Southern Movement) emerged, advocating for economic justice and local power. In the north, a Zaidi revivalist movement led by Husayn Al-Houthi critiqued the government and promoted a distinct ideology. This movement gradually growing into a significant political and military force known as Ansar Allah (the Houthis). These movements, coupled with governmental corruption and mismanagement, set the stage for the present turmoil in Yemen (Alley 2015).

The current civil war was triggered by the rearrangement of power that occurred after the Arab Spring when tens of thousands of Yemenis took to the streets against the corruption³ of then-president Ali Abdullah Saleh (McKernan 2021). Popular resistance towards the Saleh government saw elite factions splinter, and powerful individuals such as the military commander General Ali Mohsen al-Ahmar announced their support for the opposition (Theil 2012).

Mismanagement and corruption had undermined the nation's stability and fuelled significant political grievances (Schmitz 2011 b). Armed actors and networks were able to exploit the power vacuum left by the political ruptures (Salisbury 2017, Schmitz 2011 b). These tensions eventually

² The relationship between tribes and the Yemeni state is complicated. Tribes constitute social organisations with their own ethics, system of justice and politics as well as traditions (Schmitz 2011 a). Tribal leaders may have important roles to play in national politics in Yemen (Schmitz 2011 a). However, there has been a relative decline

of the tribal element in Yemeni politics over recent decades (Schmitz 2011 a).

³ Scandals included corrupt gas deals with foreign firms which were sold at vastly lower rates than the market prices (Gulf Times 2014).

evolved into full-scale conflict in 2014 when Ansar Allah took partial control of Sana'a (McKernan 2021). The Houthis' demands for lower fuel prices (which experts note were efforts to capitalise on widespread frustration to rally support⁴) and a new government escalated into a full-blown insurgency by January 2015 (Council on Foreign Relations 2023). This forced Yemeni President Abd Rabbuh Mansour Hadi to move to Aden and he issued a presidential decision to transfer the Yemeni capital to the same city (Council on Foreign Relations 2023). In response, an international coalition led by Saudi Arabia launched a military campaign against the Houthis in March 2015, marking a significant regional intervention in the conflict (Council on Foreign Relations 2023).

The Internationally Recognised Government of Yemen (IRGY) faced multiple challenges, driven by in-fighting and minimal institutional capacity. In the South, a faction of Al-Hirak, the Southern Transitional Council (STC), continues to be at odds with the IRGY despite a settlement in 2019, (Council on Foreign Relations 2023). Jihadi groups like Al-Qaeda in the Arabian Peninsula (AQAP) have exploited the turmoil, particularly in the south and east of Yemen, further complicating the conflict (Council on Foreign Relations 2023). Yemen is now divided between the Houthis in the North and the factions that make up the IRGY in the south and east (Loft 2023).

Fundamentally, the Yemeni conflict is a manifestation of the state's historical failure to establish consensus governance and its practice of divide-and-rule tactics driven largely by external actors, such as the British divide-and-rule, Egyptian intervention in the 1960s and the Saudi influence in the 1970s and 1980s. This failure has

led to recurrent conflicts since the 1960s. The situation in Yemen can now be described as a 'hybrid political order', where various armed groups and factions govern different territories, competing and cooperating in a complex patchwork of proto-states (Salisbury 2017: 2).

Yemen's war economy

Yemen's ongoing conflict has economic implications (International Crisis Group n.d.). The country is grappling with a severe economic crisis and is heavily dependent on humanitarian aid for the survival of a large segment of its population (Ahmed 2023).

Before the conflict, Yemen's economy was heavily reliant on oil and gas, which accounted for a significant portion of the government's income, leading to a rentier economy with little emphasis on a diversified tax system and accountability of public spending (Salisbury 2011). Now, Yemen is a net importer of energy (Observatory of Economic Complexity 2023). The war has shifted the economic focus drastically. Aid diversion has emerged as a significant revenue source for all parties to the conflict, particularly in areas controlled by armed non-state actors, necessitating facilitation payments by humanitarian organisations for access to controlled areas (Ahmed 2023). The war has also significantly expanded illicit economies, providing substantial economic opportunities to those engaging in global criminal markets (Global Initiative 2023).

Economically, Yemen now finds itself divided into different distinct zones (Nasser 2023). The Ansar Allah (Houthi)-led coalition controls one economic

⁴ See Al-Batati 2015.

zone, while the IRGY and various armed factions govern another (Nasser 2023). This division is best characterised as ‘*economic balkanisation*’— a state of fragmentation of economic control across different geographical regions (Davies, Wennmann 2022: 4). Each side employs economic strategies to weaken the other geo-economic zone, highlighting the deep-seated economic dimensions of the conflict.

A critical and illustrative event in this economic warfare occurred in 2016 when the IRGY relocated the headquarters of the Central Bank from Sana’a to Aden (the transfer of other government offices happened, for the most part, in 2015). In January 2016, to increase the rapidly depleting foreign currency reserves, the Central Bank had reduced foreign currency spending through reducing import financing (including basic commodity imports) (Rageh et al. 2016). However, when some exports restarted later in the year, the IRGY started wiring profits from oil exports to a Saudi National Bank account rather than contributing to the foreign currency reserves at the Central Bank (Rageh et al. 2016). This signalled a departure from both sides’ support of the Central Bank (Rageh et al. 2016). As such, this action and following escalations led to two different central banking operations within Yemen, resulting in two diverging monetary policies (International Crisis Group n.d.). The Houthis continue to use Yemeni Riyals printed before the war, while the government has printed currency with new serial numbers, resulting in varying inflation rates across the country. From 2017 to 2022, the cost of an average food basket, as defined by the World Food Programme, has seen a dramatic increase in government-controlled areas, but remained relatively stable in Houthi territories (International Crisis Group n.d.).

The war’s economic aspects are also apparent in the battle over critical infrastructure, such as seaports. In 2018, the IRGY-led coalition (led by

UAE-supported militias) attempted to capture Hodeida port, crucial for the Houthi-controlled areas, in order to cut off Houthi access to port infrastructure and gain income through taxing of imports and customs duty (International Crisis Group n.d.). However, fearing the humanitarian consequences created by a disruption of Yemen’s entire maritime value chain, the UN brokered a ceasefire. Despite this agreement, the IRGY has long continued efforts to isolate Hodeida, for example, by delaying port clearances and encouraging the use of other ports in Yemen (International Crisis Group n.d.). In February 2023, following a truce mediated by the Government of Oman, a container vessel of the civil navy docked at the port of Hodeida (Al-Batati 2023). This was the first time in seven years (Al-Batati 2023)

The different parties are also aggressively pursuing increased control over the country’s oil revenues, which was used to extract rent even prior to the conflict. The Houthis have demanded sharing of oil revenues with the IRGY. The IRGY has refused, and, in response, the Houthis carried out attacks on key oil infrastructure located in areas controlled by the IRGY at the Dhabbah port in Hadramout and the Al-Nashima port in Shabwa to weaken its financial standing by disrupting oil revenue streams (Nasser 2023).

The economic interests of the different coalitions vary. Ansar Allah’s primary goal in the conflict according to some sources is to establish a governance system with maximum strategic autonomy and limited external influence (although it continues to depend on, and act as a proxy of, Iran) (Davies, Wennmann 2022: 5). The Houthis have been consolidating economic control by developing a taxation system and a somewhat stable system of trade (Davies, Wennmann 2022: 5). However, this has included seizing assets of political rivals.

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In the IRGY-controlled areas there is a seeming lack of a unified economic interest or vision. Macroeconomic stabilisation has been impeded by a lack of coordination, as various factions have mostly sought to strengthen their own revenue sources for their own gains (Davies, Wennmann 2022: 5). Meanwhile, the government relies heavily on international support (financially as well as militarily) for its survival – especially from the Saudi-led coalition.

Extent of corruption in Yemen

Available evidence suggests that corruption and state capture is a deep-rooted issue in Yemen. According to Transparency International's Corruptions Perception Index, Yemen has a score of only 16 on a scale of 0-100, where 0 is the highest possible level of perceived corruption (Transparency International 2023). Yemen's index score has fluctuated between 14 and 16 since 2016, one of the highest levels of perceived corruption in the world. Currently, Yemen is ranked as the country with the fifth highest level of perceived public sector corruption in the world.

According to the Bertelsmann Transformation Index (BTI 2022), Yemen's protracted conflict has significantly exacerbated its governance issues, enabled increased corruption, and further depleted public sector resources. According to the BTI, the country's struggle with large-scale corruption is driven by the absence of a strategic approach (some years without even a nominal government budget) and a lack of funds, including salary payments, which may lead to further corruption in the public sector. Additionally, the brain-drain of educated Yemenis fleeing the conflict further weakens the state's capacity to combat corruption and manage its resources effectively. Overall, Yemen scores 1.51 on a scale of 1-10 on the BTI's governance score

(where 10 indicates effective governance). The country ranks 133 of 137 countries measured globally, which is low compared to the 3.9 average for the Middle East and North Africa region. BTI (2022) ranks Yemen a score of 1 in terms of Rule of Law, a low score of 1 with regard to Prosecution of Office Abuse, and a score of 1 on Civil Rights.

Drivers of corruption in Yemen

State capture and kleptocracy

For many years, powerful patronage networks have been influencing government institutions for personal benefits, exploiting Yemen's governmental structures to harness political and economic advantages for private benefit (Sana'a Center for Strategic Studies 2018: 2). Historically, power and wealth have been produced and transmitted through a highly informal, yet deeply patterned, web of tribally and regionally based patronage networks (Alley 2010). And now, as greater numbers and a wider variety of actors from previously marginal and unknown figures profit from illicit activity in the war economy, their influence in the conflict and country are becoming more pronounced (Sana'a Center for Strategic Studies 2018: 2).

During the presidency of Ali Abdullah Saleh (1978-1990 YAR and 1990-2012 RoY), patronage networks established and maintained by Saleh exerted significant control over the country's economic and political landscape. Saleh's system of patronage was largely funded by revenues from oil exports, which formed a crucial part of Yemen's economy. Around 10 prominent families and business groups, closely associated with Saleh, were said to be responsible for around 80% of the imports and most key economic sectors, such as manufacturing, extractives, and logistics (Hill et al

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2013: 5). Their control over these sectors not only allowed them to amass substantial wealth but also to exert considerable influence over the country's economic direction and policy making (Hill et al 2013: 5).

The entrenched economic interests of this powerful closed network were a significant obstacle to the development of a freer, more diversified economy in Yemen. This deep-rooted economic problem not only undermined economic development, but eventually came to undermine the country's stability too (Hill et al 2013: 5).

State capture enabled kleptocracy at a high level. Ali Abdullah Saleh is suspected by UN-appointed investigators of having accumulated illicit wealth somewhere in the range of US \$32 billion to US \$60 billion, from the beginning of his tenure in 1978 to his ouster following the Arab Spring (Group of Experts on Yemen 2015). Evidence suggests that Saleh engaged in corrupt practices, especially in relation to gas and oil contracts, and frequently demanded bribes and other illicit payments in exchange for exploration and extraction rights (Browning 2015). According to reports, a significant portion of this wealth was laundered and transferred abroad under various aliases, or under the names of associates who held these assets on Saleh's behalf (Browning 2015).

Conflict

The ongoing conflict in Yemen may have disrupted some networks and facilitated new opportunities for corrupt and criminal practices, but it has only compounded existing systemic corruption in Yemen (Sana'a Center for Strategic Studies 2018: 2). Elites continue to use their privileged positions to manipulate rules and systems to extract rents (Sana'a Center for Strategic Studies 2018: 2).

However, with that said, the conflict has also introduced new challenges. In particular, it has led to the emergence of – in many cases previously unknown – new players and networks, who contest access to state resources. For example, the financial involvement of Saudi Arabia and the United Arab Emirates has extended patronage networks across national borders and empowered new actors (Sana'a Center for Strategic Studies 2018). In the context of the war, gatekeeping is increasingly important.

These warring parties have been known to divert significant amounts of public funds, both tax and customs revenues as well as foreign aid, through various forms of financial malfeasance, such as money laundering, corruption, and profiteering (Dihmis, Al-Obaly 2021). The very financial resources that are intended for service delivery, reconstruction, and relief, have been redirected to enrich individual warlords in the context of war (Dihmis, Al-Obaly 2021).

A controversial case (explored below) involves accusations regarding the misappropriation of funds from a \$2 billion Saudi reconstruction package by Yemeni President Abd Rabbuh Mansour Hadi's government (Dihmis, Al-Obaly 2021). However, while there may have been a failure to allocate funds optimally and evidence of misconduct, the UN Security Council Group of Experts retracted its accusations against the Yemeni Government (Al-Ali, Nasser 2022). Nonetheless, this retraction was seen as 'highly unusual' and suggested that the report's conclusions were 'not entirely wrong' and that the report had indeed cast a spotlight on the 'dysfunctional and deeply problematic state of affairs' at Yemen's Central Bank (France 24 2021).

The Houthis, too, have been accused of profiteering and embezzling billions in tax and customs revenue collected in areas under their control as well as

other sectors such as electricity (Dihmis, Al-Obaly 2021; Al-Jalil 2023).

In addition to opportunities for embezzlement, the war led to new elites profiting from the growing illicit markets in the country. As the war economy and its illicit markets grow, profiteers become more entrenched (Sana'a Center for Strategic Studies 2018: 1).

Another set of actors who may have benefitted from the conflict are energy importers, including the French company TotalEnergies (Sana'a Center for Strategic Studies 2018: 5; The Cradle 2023). After the war began, Yemen became dependent on fuel imports, which gave well-connected actors in the IRGY opportunities to secure tenders for imports. In Houthi-controlled areas, imports became controlled by connected traders who were able to import various petroleum products from Iran to sell throughout Yemen at a margin significantly above market rate. These traders and their patrons were allegedly also capable of capturing a growing market share by extorting non-Houthi competitors with unofficial fees which have been reported to be stipulated in official paperwork (Sana'a Center for Strategic Studies 2018:5-6).

Illicit trade

Yemen is both a destination, origin, and transit trade zone for various illicit goods (Global Initiative 2023). This is not a new phenomenon; Yemen has long been an important hub for various illicit markets. These include human trafficking of East Africans into the Gulf region, the smuggling of fuel into the East and Horn of Africa, and the regional arms trade (Global Initiative 2023, OECD 2022).

In pre-conflict Yemen, elites gave arms dealers a certain level of security and a safe haven in exchange for some of these arms and financial

contributions. Arms dealers in Yemen were often part of political patronage networks, including those of Ali Abdullah Saleh (OECD 2022). In return for operational freedom, these arms dealers engaged in revenue sharing (OECD 2022). This involved a variety of actors operating at different stages of the process, including domestic arms dealers, owners of transportation companies, and tribal leaders who permitted the movement of arms in their areas of jurisdiction (OECD 2022). These networks were also maintained by the highest-level public officials (OECD 2022). These enabling conditions, as well as the strategic location of Yemen, supported the country's rise as a regional transnational arms hub (OECD 2022).

Some evidence suggests that the illicit arms market has grown since the onset of the current civil war. According to some figures, Yemen has between 40 and 60 million small arms in the country (OECD 2022). This would make Yemen (including prior to the conflict) the country with the highest rate of small arms ownership after the United States (Bahadur 2020: 5). Some evidence also shows Houthi armed forces producing several types of weapons domestically (Lyamin 2017).

In addition, the country has seen a substantial influx of arms provided by Iranian state actors (OECD 2022). This Iranian weaponry is often more sophisticated than small arms and has been known to include items such as surface-to-air missiles (Bahadur 2020: 5).

Another factor that affects the supply of weaponry in Yemen is the diversion of arms to the anti-Houthi coalition. Evidence suggests that arms of Saudi, Emirati, and American origin have been diverted to criminal markets (Bahadur 2020: 7). Yemen's arms trade supplies Somalia, but also other parts of the Horn of Africa and the broader East Africa region (Bahadur 2020: 1). Arms dealers have exploited the widespread gaps in anti-money

laundering/countering the financing of terrorism controls to facilitate these deals (Bahadur 2020: 1). Aliases are used, as well as proxy agents to conduct transactions on their behalf, allowing them to operate without fear of detection (Bahadur 2020: 1).

Drug trafficking is also a growing issue. Drug seizures on the border between Yemen and Saudi Arabia suggest that the country is either a transit or origin country for different types of amphetamines (OECD 2022). Evidence also suggests that the country has become a transit and destination country for counterfeit pharmaceuticals, as well as heroin originating from South Asia (Global Initiative 2023).

With regards to human trafficking and human smuggling, Yemen has long been a transit for irregular migration movements from the Horn of Africa towards the Gulf (OECD 2022). Given its strategic location and importance, networks facilitating human smuggling and/or human trafficking have been well-entrenched for a significant period of time (OECD 2022). However, in the current conflict, Yemen has evolved from being primarily a transit country to being a substantial origin country for human smuggling and/or trafficking (Global Initiative 2023).

Given the level of illicit trade, Yemen is considered one of the top countries for illicit capital outflows according to the OECD (2022). The ongoing conflict has exacerbated this issue by fragmenting the central banking system into two separate entities, complicating economic regulation and oversight. The traditional banking sector in Yemen

has been significantly affected by global financial de-risking⁵ initiatives, which has also enabled existing unregulated financial networks. These networks include informal Hawala systems⁶, which are prevalent in Yemen due to their historical roots. However, they often lack the necessary framework to comply with international anti-money laundering and countering the financing of terrorism (AML-CFT) standards. Practices such as basic customer due diligence and Know Your Customer (KYC) procedures are uncommon within these networks, as Hawala systems are often anonymous in nature (OECD 2022). The conflict has also reduced the formal banking sector's capacity due to branch closures, decrease in the number of staff, working hours and inadequate salaries, and suspension of expansion plans (Raga et al. 2021).

According to Bahadur (2020:1), the gaps in these informal financial systems have been exploited by Yemeni and Somali arms traders. These traders have utilised vulnerabilities in Hawala networks to facilitate large-scale money transfers, particularly in connection with arms deals. This exploitation serves not only to bypass international financial regulations but also to circumvent the UN arms embargo on Somalia, highlighting the challenges in regulating and monitoring financial activities within Yemen's complex and divided financial landscape.

⁵ De-risking refers to compliance departments restricting commercial engagements in a specific jurisdiction out of compliance risks, such as terrorist financing, sanctions evasion, or money laundering.

⁶ Hawala is an informal system of money transfer that involves networks of money brokers without any physical money moving, based on trust and the balancing of hawala brokers' books (Kagan 2023).

Sectors affected by corruption

Health sector

Yemen's health sector is in a dire state due to both the prolonged armed conflict, economic decline, institutional collapse, and persistent corruption (Lebos, Duran 2021: 1). Over 20 million Yemenis are estimated by the World Health Organization (WHO 2023) to require health assistance and only 54% of the country's health facilities operate at full capacity (WHO 2023).

Although the healthcare service provision crisis has been worsened by the conflict, corruption and mismanagement may also have been important contributing factors. Al-Karim et al (2021: 2-3) point out that, despite being relatively unaffected by active warfare, areas like Hadhramout in eastern Yemen, have nonetheless witnessed a decline in humanitarian and health conditions similar to areas that have seen significant combat. This, the authors claim, can be attributed to poor governance in the health sector.

Prior to the onset of the current conflict, Yemen's health sector already suffered from a severe governance deficit (Lebos, Duran 2021: 7). Governance assessments prior to the conflict suggested that corruption was a significant problem all the way down to the facility level, particularly regarding costs and procurement of consumables (Ismail and Qirbi 2017). Weak policy commitment was also a problem, as health plans existed, but with no accompanying formal legislation enacted to ensure their implementation (Ismail and Qirbi 2017) as well as a lack of accountability and enforcement.

The conflict has led to a further deterioration in the quality of governance in the sector. Yemen's de-facto divisions have fragmented the healthcare

system, making it unclear how to govern the sector (Lebos, Duran 2021: 7). Despite this, district and governorate health offices continue their supervisory roles, and there have been signs of institutional resilience in some areas of health policy coordination (Lebos, Duran 2021: 1, 7).

Service delivery in the health sector is primarily ensured by international organisations and humanitarian actors, particularly in the northern regions. Half of Yemen's population depends on humanitarian aid, which increased significantly in 2019, with a focus on cholera, vaccinations, and famine relief (Lebos, Duran 2021). Yemen's health system, overly dependent on external assistance, faces an uncertain future due to reduced funding and the challenges of managing health crises with limited resources (Lebos, Duran 2021).

One investigation suggests that hospitals are shortening treatment to speed up discharge from the hospital to collect the maximum amount (\$4,000) for each case (Al-Salmi 2021). It claims that hospitals often perform unnecessary amputations, citing a growing number of cases where patients, including children, have been subjected to amputations that could have been avoided (Al-Salmi 2021).

Water

Yemen has been handling a severe water crisis for decades, long before 2014. The water crisis has been exacerbated by its semi-arid landscape and absence of permanent rivers, population increase, lack of oversight, and agriculture (Lackner 2023). It relies heavily on rapidly depleting groundwater sources, as it simultaneously sees significant population growth (Al-Mowafak 2020).

As with many other challenges facing the country, Yemen's water shortages have been compounded

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by the ongoing conflict due to the destruction of infrastructure (Al-Mowafak 2020; Lackner 2023). Another core challenge in terms of water provision continues to reside with policy failures that have led to inefficient water usage and outright waste. Policies, such as import subsidies for grain, contradicted efforts to reduce unsustainable drilling because it led to growing water-intensive crop cultivation (Al-Mowafak 2020).

Corruption has had a significant role in the water crisis, as it has limited the government's ability to enforce laws that would hinder illegal and unsustainable groundwater extraction. Rights to water extraction are often secured via bribery (Al-Mowafak 2020). Elite groups have also been granted permission for excessive drilling by bribing patrons (Al-Mowafak 2020).

At the same time, municipal water services have more or less collapsed, giving rise to an industry of privately extracted water sold at higher prices. This has caused substantial inequality in access to clean water (Al-Mowafak 2020). Domestic water and sanitation services are now totally inadequate (Lackner 2023). Such issues have been reported for over a decade (see Saeed 2011).

International organisations have provided significant funding and assistance to keep Yemen's water and sanitation systems operational during the conflict. This sectoral aid, too, has seen corruption scandals. In 2020, there were reports of corruption in a UNICEF-funded government procurement and tenders process for Yemen's water sector. The scheme, which ran from 2018 to 2020, involved significant overpricing (up to 1000% of market price). This led to action against several civil servants in the Ministry of Water and Environment (AWTAD 2022: 49).

There is the risk that armed groups may weaponise this absence of rules-based governance over water

resources. Reports claim that groups such as Al-Qaeda have, in the absence of official governance and service delivery, used the provision of essential services, such as water and electricity, to gain support (Al-Mowafak 2020). For example, this was used during Al-Qaeda's takeover of the city of Mukalla when, after patching up the sewage system, propaganda videos were created and circulated of their work (Al-Ganad et al. 2021). There are also reports that humanitarian organisations have been blocked from distributing water (Al-Mowafak 2020).

Historically, competition over water has been a source of local conflicts in parts of Yemen. Given the exacerbating impact of the war on the water crisis in Yemen, some experts note that in the future, water scarcity will become another conflict driver (Al-Mowafak 2020).

Security sector and armed forces

During the period of Ali Abdullah Saleh's tenure, Yemen's military-security services operated with significant autonomy and without meaningful levels of civilian oversight. Loyalties inside the administrative structures tended to be towards individual commanders, who predominantly came from Saleh's own family or tribe (International Crisis Group 2013).

The 2011 uprising led to a split in the military, with factions supporting either the protesters or the regime (International Crisis Group 2013). Since then, the Yemeni government went into exile and the security landscape became fragmented (see Background section above).

In Houthi-controlled northern areas, state security institutions became politicised. Existing commanders were purged, replaced with hand-

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picked appointees that have allowed the Houthis to exert significant control within these institutions.

Across Yemen, numerous non-state actors function as de-facto security. In many cases, these non-state actors are predatory and lack accountability. They often serve in the interests of specific parties or clans (Mohammed 2021). Despite a widespread desire among Yemenis for effective police institutions, the fragmentation of security services, such as policing, is inadequate across Yemen.

The police in Yemen have historically been used by elites for personal enrichment. However, the vulnerability of the policing sector to corruption has been exacerbated by inadequate (or non-existent) police salaries (Othman, Transfeld 2020). The absence of adequate operational budgets and irregular and insecure salaries make the police susceptible to capture by those who can afford to pay. There are reports that police across various regions accept illicit payments in exchange for their impartiality. Particularly in Houthi-held areas, it has been reported that policing has been heavily politicised (Othman, Transfeld 2020). Critics have argued that issues surrounding policing and everyday security service provision have been overlooked in a context where stabilisation, counter-insurgency, and counter-terrorism have been prioritised (Lewis 2013).

In the context of conflict, there are also corruption risks for the armed forces such as the fraudulent inflation of salaries or 'ghost soldiering' (people registered on pay roles who do not exist or work there) and other military costs to enable embezzlement and theft of weapons and supplies has been a long-standing practice in Yemen (Sana'a Center for Strategic Studies 2018: 4).

High-ranking officers, especially those associated with the internationally recognised Yemeni government, have been known to inflate the

number of soldiers in order to embezzle surplus salary funds (Sana'a Center for Strategic Studies 2018: 4). In addition to salaries, senior military leaders obtain combat and logistical equipment and supplies based on these numbers. This additional material is sold on illicit markets (Sana'a Center for Strategic Studies 2018: 4). Both the funds and equipment at risk of embezzlement in many cases come from external sources, such as Saudi Arabia (and previously the UAE). The financial involvement of the Saudi-led coalition has arguably created economic incentives to overreport military capacities in order to embezzle funds and divert weapons (Sana'a Center for Strategic Studies 2018: 4). At a lower level, there are reports of anti-Houthi military and security personnel registering in more than one battalion in order to receive multiple salaries from different sources (Sana'a Center for Strategic Studies 2018: 4).

There are further indications that weapons are allegedly smuggled between territories controlled by different armed factions, suggesting that there is collusion between parties on both sides of the conflict (Sana'a Center for Strategic Studies 2018: 4).

Aid

According to the Office for the Coordinator of Humanitarian Affairs (UNOCHA, n.d.), Yemen has received US\$ 2.25 billion from a range of (predominantly western) donors. Although there is a substantial need for funding, the inflow of aid has provided ample opportunities for illicit enrichment for conflict parties (Al-Deen 2022). Critics argue that aid flows have not been monitored adequately (Al-Deen 2022) and that factors such as movement restrictions made it difficult for international donors, international humanitarian actors and non-governmental organisations to control their goods upon entering the country. Instead of

contributing to a resolution of conflict and developing stability, much of the aid that arrives in Yemen exacerbates the war by fostering the war economy and prolonging national dependence on humanitarian aid (Orkaby 2021).

Investigations into WHO and UNICEF funding have uncovered extensive cases of corruption, embezzlement, misappropriation, and aiding combatants for self-enrichment. In one case, a WHO staff member in Yemen stands accused of fabricating payrolls and employees. WHO has also noted issues related to a lack of monitoring over procurement and hiring, as well as unsatisfactory financial controls up until 2018, particularly in its office in Sana'a (Michael 2019). UNICEF has investigated cases where staff members allowed a Houthi official to use a UNICEF vehicle, providing him protection from airstrikes. Corruption was also reported during UNICEF's financial support to the Government Water Corporation which intended to re-maintain water and sewage networks (Al-Shalali 2022).

This has led to serious questions about impartiality in aid distribution and management, and concerns about UN offices being susceptible to capture by militants via threats, intimidation or corruption (Michael 2019). There have been multiple reports of UN staff being complicit in diverting aid, including incidents of medical supply trucks being hijacked by armed groups to be distributed among militants or sold for profit.

Activists have called for transparency in aid spending, with campaigns, such as *Where is the Money?* highlighting the lack of transparency in aid delivery in war-torn Yemen (Michael 2019).

More recently, a joint human rights report has claimed that several UN bodies and offices have been involved in providing financial, logistical, and in-kind support to the Houthi group and other

affiliated parties under various pretexts, such as demining. The report, led by five local human rights organisations, including the National Organization for the Defense of Rights and Freedoms (HOOD), alleges that US\$ 176 million earmarked for demining initiatives has been exploited for military purposes, predominantly by the Houthis. Following these allegations, Yemen's Attorney General has directed the Public Prosecution in Marib Governorate to initiate an investigation into these claims (KHBR 2023).

Due to concerns over corruption risks involving aid flows in Yemen, key donors have expressed that they are considering reducing humanitarian aid to the country (Slemrod, Parker 2020). In 2020, some international donors have urged for a 'reduction and re-focusing' of assistance, particularly in areas controlled by the Houthis. This plea was due to challenges, such as excessive bureaucratic hurdles, unjustified movement restrictions and safety issues, which hindered impartial and efficient aid delivery (Slemrod, Parker 2020). In 2019, the World Food Programme (WFP) threatened to suspend aid due to Houthi rebels diverting food aid for their own gain (El Sirgany 2019), happening at a time of serious food instability for the wider Yemeni population (ACAPS and Mercy Corps 2020).

Oil and gas

Oil and gas are crucial industries for Yemen and have long been vulnerable to corruption. Before the current conflict, Yemen's economy was heavily dependent on crude oil production and export, which, at the time, accounting for approximately 80% of government income (Engelke 2012) and was one of the main sources of foreign currency. In 2010, Yemen also began to export liquefied natural gas (LNG). During this period, however, oil revenues and foreign direct investment were in

decline, while capital outflows rose (Salisbury 2011: 2).

The risk of corruption in Yemen's oil and gas sector was (and is) closely tied to the country's broader economic framework. Prior to the current conflict, the general economy, and the oil and gas sector, were dominated by patronage networks linked to the political class that gained substantial access to oil concessions (Alley 2010). This complex web of entrenched interests and state capture made the oil and gas sector particularly susceptible to corruption (Salisbury 2011: 11).

During the current war, grand corruption in Yemen's oil sector has persisted, and has continued to be controlled by political elites under opaque circumstances (Middle East Monitor 2021). Hadhramawt, in eastern Yemen, sees the highest levels of oil extraction, has suffered numerous negative social and environment impacts caused by the sector. Environmental pollution is widespread, with polluted water being re-injected into reservoirs to bypass costly water treatment (Al-Wadaey et al. 2023). Local populations have seen an alarming increase in different types of cancer and the promised jobs provided by the companies never came to fruition (Al-Wadaey et al. 2023). Oil companies have deliberately overlooked regulations for financial gain and this, accompanied with the absence of effective oversight and widespread corruption in the sector, has led to devastating local impacts (Al-Wadaey et al. 2023).

While the oil sector is still largely controlled under the IRGY, the situation is unpredictable, with rebel groups making millions of US dollars in profits by extorting the national oil company and imposing taxes on good passing through ports under their control (GAN Integrity 2020). In 2022, the export of oil stopped for one year due to Houthi attacks against ports and export facilities (EPC 2023).

Electricity

The Yemeni electricity sector is in a state of crisis, exacerbated by corruption and inefficient management. Despite an ambitious plan to boost electricity generation capacity, production has been reduced. The country suffers from a lack of capacity in electrical production, causing significant power cuts and outages in large parts of the country (Sheba Intelligence 2023). It has been argued that the crisis in Yemen's electricity sector is a result of corruption, mismanagement, and lack of accountability (Abdullah et al 2023).

Aden is grappling with a severe electricity crisis, with inadequate generation capacity and alleged corruption within the electricity sector. These issues have been enabled by a multitude of governance issues, including misappropriation of funds for electricity infrastructure by government officials (Alrimi 2022). A Human Rights Watch Report accused both the IRGY and STC of negligence in meeting residents' right to electricity (Al-Aghbry 2023). Residents of Aden have faced repeated and increased restrictions on electricity negatively impacting their standard of living (Al-Aghbry 2023). While the same amount of funding is allocated to operate the power plants (two to three million dollars spent daily to operate eight hours a day), actual operating hours decreased to four per day, despite that the allocated amount is still paid from the state treasury (Al-Aghbry 2023). This missing funding constitutes "a matter of corruption and plundering of state funds" (Al-Aghbry 2023).

While the problem is said to be worst in Aden and conflict-affected parts of the county, resource-rich and comparatively more peaceful parts of Yemen, such as Hadramawt, have also suffered from the electricity crisis. Local authorities have tried commissioning new power plants, but corruption has marred the process and led to failure to comply

with open tendering standards (Abdullah et al 2023).

Legal and institutional anti-corruption framework

Before describing the legal and institutional framework, it should be noted that while a number of laws and conventions have been introduced in Yemen, experts consider their implementation to be ineffective. Due to many of the factors such as political will, legal gaps and a lack of regulatory capacity, the impact they have on levels of corruption is currently limited.

International Conventions

Yemen signed the United Nations Convention against Corruption (UNCAC) in 2003 and ratified it in 2005. In addition to UNCAC, Yemen is a signatory to the [Arab Anti-Corruption Convention](#), which promotes collaboration among Arab states in preventing and combating corruption. However, the split in the governing systems in Yemen has led to a significant decline in the country's compliance with the UNCAC (AWTAD 2022: 7).

Yemen is also a member of the [Middle East and North Africa Financial Action Task Force](#) (MENAFATF) – a FATF-style regional body that focuses on issuing voluntary recommendations to combat money laundering and terrorism financing.

Yemen's most recent FATF mutual evaluation report was released in 2014 and highlighted the country's substantial progress in enhancing its anti-money laundering and counter-terrorist financing (AML/CFT) systems. Overall, Yemen was considered 'largely compliant' with FATF recommendations. This was particularly due to positive developments in the country's legislative

framework and operational capabilities, particularly in the areas of predicate offenses, customer due diligence, and strengthening of the Financial Intelligence Unit (FIU) (MENAFATF 2014: 4-5). However, the report also noted the need for further improvements, including enhancing the effectiveness of supervisory authorities, such as the FIU (MENAFATF 2014: 5).

Domestic legal framework

Since it signed the UNCAC, Yemen has made some significant positive changes to its anti-corruption regulatory framework, and the country has shown progress in its handling of anti-money laundering and combating the financing of terrorism (AWTAD 2022). However, the initial progress in setting up a legal and institutional anti-corruption infrastructure stalled after the onset of the war. The political and administrative fragmentation of Yemen has complicated efforts to undertake reforms that would make the country compliant with the UNCAC and able to build an effective regulatory system (AWTAD 2022).

Anti-Corruption Law

Yemen passed the Anti-Corruption Law, Law no 39 (2006), following its ratification of the UNCAC. This Law established an independent National Authority, which was granted financial and administrative autonomy under Article 6.

Under Chapter 1, Article 8, the authority was assigned a number of tasks, including the development and implementation of anti-corruption policies, drafting a national anti-corruption strategy, managing corruption reports and complaints, investigating corruption, and international cooperation.

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Chapter 4, Article 30, outlines which crimes are considered corruption. These include bribery, money laundering, embezzlement, trading in influence and a range of other crimes.

Law on Financial Statement Disclosures

The purpose of Law no 30 of 2006, related to Financial Disclosure, is to protect public interest by upholding the integrity of public officials and limiting opportunities for illicit enrichment. The law requires anyone in a position of public authority to declare their assets to the Supreme National Authority for Combating Corruption (SNACC). Exceptions include the president and key anti-corruption officials, who submit their asset declarations to the office of the Speaker of Yemen's legislature.

Article 20 to Article 25 outline the penalties for illicit enrichment. However, Article 14 states that all disclosures submitted to SNACC must be kept secret and that it is punishable to share these in any context.

However, the law does stipulate measures for ensuring accountability to the public, such as sanctions in cases of non-compliance with the law on financial disclosure (AWTAD 2022: 44).

Right of Access to Information

Law 13 of 2012, Yemen's Right to Access to Information Law, sets out the framework by which citizens of Yemen can access state information. Articles 24 to 26 outline exceptions, such as information that may endanger an individual's safety, information that may endanger national security, etc. According to the law, all natural persons have the right to request information. Under the Right to Information Law, if someone's request for information is denied or delayed, they

have the right to file a grievance report with the Office of the Commissioner-General for Information.

The Centre for Law and Democracy (2012) gives Yemen's Access to Information Law a score of 102 out of a max of 150 – a fairly robust score. Likewise, AWTAD (2022: 56) notes that Yemen is largely compliant with the UN Convention against Corruption.

However, there are reports that the Office of the Commissioner-General for Information is currently inactive due to the ongoing conflict (AWTAD 2022: 10). This raises questions about the extent to which the law is being complied with in practice.

The Law on Government Tenders, Auctions and Stores

Law 3 of 1997, The Law on Government Tenders, Auctions, and Stores Law, sets out key principles for tenders and procurement. It outlines general rules and procedures to ensure open competition and fair tender evaluations. The law also includes provisions for recruitment, job conduct and asset disclosure, to prevent conflicts of interest in various government bodies and procurement roles.

According to Article 52, the Ministry of Finance and Ministry of Construction and Housing are responsible for the implementation of Law 3 of 1997.

The Law on combating Money Laundering and Financing of Terrorism

The Law on combating Money Laundering and Financing of Terrorism, Law 1 of 2010, (amended by Law no 17 of 2013) aims to combat money laundering and terrorism financing activities in Yemen.

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The law identifies various acts constituting money laundering offenses, such as concealing transfers of proceeds from crime or corruption. The law extends the liability to those who assist in money laundering. It also covers a number of predicate offenses, including ones such as bribery, drug trafficking and human trafficking.

The law also criminalises financing acts of violence or terrorism. One exception, under Article 4.5, stipulates the following: ‘Cases of struggle by whatever means against foreign occupation and aggression for liberation and self-determination in accordance with the principles of international laws shall not be of the crimes covered in this article, however these cases shall not include any act affecting the territorial integrity of any Arab State.’

Institutional framework

The Sana’a and Aden-based coalitions have their own institutional systems and style of governance. Anti-corruption enforcement is therefore highly fragmented (AWTAD 2022: 7). Each system does not recognise the other and refuses to coordinate with one another (AWTAD 2022: 7).

Supreme National Authority for Combating Corruption

Law no 30 of 2006 (Law on Financial Statement Disclosures) identified the Supreme National Authority for Combating Corruption (SNACC) as the agency responsible for its implementation. This was the first legal mention of SNACC, which, at the time, had not been officially formed. SNACC was officially formed upon the passing of law 39 later. It became fully operational with its first committee in 2009 (AWTAD 2022: 24).

The SNACC in Yemen comprises 11 members, including representatives from civil society and the private sector. SNACC members have the rank of Minister and are responsible for implementing financial disclosure laws. SNACC is financially and administratively independent, reporting its activities to the President and Cabinet every three months. The law protects SNACC's autonomy and criminalises interference in its operations.

SNACC has a broad range of functions, including policy-making, prevention, investigations, prosecutions and international cooperation in the area of anti-corruption. It is also responsible for assessing asset declarations (UNDP: 11-13). Although SNACC has received and investigated hundreds of reports since its founding. Its current capacity to combat corruption across Yemen appears to be limited by legal and operational challenges and regional political divisions.

The legal and operational status of SNACC varies between regions, as areas are controlled by different authorities. SNACC's legitimacy is questioned internationally, which limits its effectiveness and its ability to operate within a global context (AWTAD 2022: 31).

In Aden, SNACC faces legal challenges including three court rulings that invalidate the Presidential Decree forming its members. Additionally, its members have not been re-elected since their term ended in 2018, and with only four out of the required eleven members, the decisions and actions taken by SNACC in Aden are legally questionable (AWTAD 2022: 31).

Central Organization for Control and Accountability

The Central Organization for Control and Accountability (COCA) is Yemen’s Supreme Audit Institution (SAI). As a SAI, COCA plays a crucial role in overseeing public financial management in

Yemen. Its core mission is to ensure that all public funds and expenditures are controlled, accounted for, safeguarded, and utilised effectively and efficiently. COCA is accountable to the President of the Republic of Yemen and the Parliament.

It has the power to examine and monitor spending in public institutions. It has the mandate to carry out site inspections as well as to refer corruption or mismanagement cases to the judiciary. COCA also has to submit periodic reports on spending. (AWTAD 2022: 27).

Despite holding extensive oversight powers, COCA allegedly faces some challenges due to legal ambiguities and conflicts of power with other bodies (AWTAD 2022: 27).

COCA is present in both Aden and Sana'a, with two separate websites⁷. It is unclear whether COCA still operates as one entity in practice.

Supreme Authority for Tenders Control and High Tender Board

The Supreme Authority for Tenders Control (HATC) is a supervisory body with legal, financial and administrative independence. It operates under the Presidency of Yemen and comprises members representing various sectors, including commerce, industry, civil society and the judiciary. Neither HATC nor the High Tender Board (HTB) is fully independent; HATC reports to the Presidency, while HTB reports to the Prime Minister. Members of the HATC are appointed by the president (AWTAD 2022: 46).

HATC and HTB were established in Aden in early 2020. HATC also has an office in Sana'a, but it does not seem to have the capacity to conduct

meaningful oversight activities as of the most recent reports (AWTAD 2022: 47). Among the reasons for this are lack of adequate skilled personnel and political pressures (AWTAD 2022: 47).

The Aden branch of HATC is also reported to lack funding and capacity. It allegedly suffers from pressure from government leaders, insufficient oversight and financial challenges. (AWTAD 2022: 47)

Judiciary and prosecutors

The 1991 Yemeni constitution, in Article 149, states that the judiciary independence, both financially and politically. The constitution says that Yemeni judges should be independent, subject only to the law, and it defines undue interference in judicial matters as a crime (AWTAD 2022: 61).

In addition to the constitution, the independence of the judiciary is also protected by Article 89 of the Judiciary Law, which constrains the ability of ministers and executive actors to interfere in the judiciary (AWTAD 2022: 61). However, despite these provisions, public prosecutors in Yemen do not have adequate levels of independence in practice (AWTAD 2022: 61).

Yemen's judiciary is vulnerable to political and armed group interference. Enforcement of judicial decisions, especially against influential tribal or political figures, is weak. As the state institutions degrade, citizens increasingly rely on tribal justice and customary law (Freedom House 2023).

In Houthi-controlled areas, criminal courts are operational but are often used as political tools by Houthi leaders. In other parts of Yemen, the

⁷ <http://coca.gov.ye/> and <http://cocaye.org/>

judicial system is reported to be largely non-functional (Freedom House 2023).

Financial Intelligence Unit

As a result of stipulations under the Anti-Money Laundering Law of 2003, and later with the Law on combating Money Laundering and Financing of Terrorism of 2010, Yemen established its Financial Intelligence Unit (FIU). The Yemeni FIU operates as a (theoretically) independent entity with law enforcement capabilities. As with other FIUs, its primary responsibilities include receiving and analysing Suspicious Transaction Reports (STRs) from various financial institutions and taking action in cases where investigations show proof of financial crimes, such as terrorist financing and money laundering (Yemen FIU, n.d.).

The most recent FATF mutual evaluation undertaken for Yemen was in 2014, in which the country was removed from the Financial Action Task Force grey list. This was a result of concerted efforts to improve Yemen's anti-money laundering and counter-terrorist financing (AML/CFT) framework (AWTAD 2022: 71). However, during the current conflict, the Financial Action Task Force (FATF) has not been able to conduct a mutual evaluation report. As a result, Yemen has been placed on the FATF grey list, denoting it as a jurisdiction under increased surveillance due to strategic shortcomings (AWTAD 2022: 71).

It has also been reported that following up on suspicious activity reports has been a challenge in the context of the growing war economy and that there are capacity challenges in the FIU (AWTAD 2022: 73). According to the 2014 Mutual Evaluation Report of Yemen, the FIU has full authority to undertake its work but lacks staff to adequately carry out all its functions (MENAFATF 2014: 5)

Effectiveness of the legal and institutional anti-corruption framework

While there are limited recent assessments on Yemen's institutional accountability structures, it can be ascertained that they are currently ineffective, particularly given the institutional fragmentation the country has experienced over the last decade. Critics have doubted the sincerity of the Yemeni authorities' anti-corruption efforts and have claimed that legal and institutional anti-corruption measures have largely been taken in response to international and regional pressure (AWTAD 2022: 5). The delay in establishing mechanisms to fight corruption has allowed it to become pervasive in Yemen (AWTAD 2022: 5).

Critics also argue that the laws and institutions created to prevent and combat corruption were largely designed to be ineffective, reflecting a lack of genuine political commitment to the anti-corruption agenda (AWTAD 2022: 5). While Yemen's legal framework grants a high degree of autonomy to its oversight and anti-corruption bodies, enforcement and implementation of these mandates still remain limited (AWTAD 2022: 32).

Additionally, there are a number of remaining legal gaps, such as a special law that would provide protection to whistleblowers. (In 2022, such a law was rejected by the parliament in Sana'a (AWTAD 2022: 43). While whistleblower protection is mentioned in Yemen's Anti-Corruption Law, its provisions for protection are considered insufficient (AWTAD 2022: 43).

Yemen also lacks a comprehensive law addressing conflicts of interest. Current legislation is limited in scope and does not grant specific powers or a clear mandate to any specific institution (such as SNACC) to assess conflicts of interest (AWTAD 2022: 43).

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Other Stakeholders

Civil society

The transformation of the civil society environment in Yemen, amidst the backdrop of corruption and conflict, has altered the role and perception of civil society organisations (CSOs) (Elayah, Verkoren 2020: 492). With significant variability in data across various institutions, it is difficult to confirm figures on the number of CSOs currently operating in Yemen.

The landscape has been marred by closures, and there has been a shift to relief work. A 2015 survey indicated that 70% of Yemeni CSOs have closed, and 60% have faced harassment, including threats of violence (Elayah, Verkoren 2020: 490-491). Many CSOs face extortion and manipulation by militias that want to influence the flows of aid and co-opt the mandates of CSOs to suit their political interests (Elayah, Verkoren 2020: 492).

There is a blurring of boundaries between politics and civil society, as CSOs without political affiliations often find themselves denied access to political forums and are targets for capture by militias seeking loyal affiliates (Elayah, Verkoren 2020: 493). Protests are frequently suppressed with the use or threat of violence, and opposition media outlets have been shut down, leading to widespread self-censorship among CSOs and the media (Elayah, Verkoren 2020: 496).

Civil society in Yemen is also characterised by fragmentation, with various groups aligned along different political lines. Dependency on foreign donors further constrains these organisations, fostering negative perceptions about foreign NGOs and their accountability or hidden agendas. They have been accused of neo-colonialism as they are perceived as promoting a western agenda (Elayah

and Verkoren 2020). This can also risk perpetuating power disparities within a community. Elayah and Verkoren (2020: 493) suggest that international donors might earn greater legitimacy by engaging more with information or traditional actors, such as local community leaders.

Media

Freedom House (2023) reports that the conflict in Yemen has severely impacted civil liberties, particularly media freedom and freedom of expression. Armed actors have taken control of media outlets or enforced censorship, blocking access to various digital platforms (Freedom House 2023). Violence against members of the media has been on the rise. Journalists face ongoing harassment and detentions (Freedom House 2023). According to reports, between 2011 and 2021, 50 members of the media have been murdered (New Arab 2022).

Personal expression and private discussion are limited due to intimidation and surveillance by armed groups, particularly the Houthi authorities. The Houthi have detained critics and used controlled courts to issue severe penalties, including death sentences (Freedom House 2023).

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The U4 anti-corruption helpdesk is a free research service exclusively for staff from U4 partner agencies. This service is a collaboration between U4 and Transparency International (TI) in Berlin, Germany. Researchers at TI run the helpdesk.

The U4 Anti-Corruption Resource Centre shares research and evidence to help international development actors get sustainable results. The centre is part of Chr. Michelsen Institute (CMI) in Bergen, Norway – a research institute on global development and human rights.

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