

Independent Reporting Mechanism

Action Plan Review: United
Kingdom 2023-2025

Open
Government
Partnership



Independent
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Mechanism

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Section I: Overview of the United Kingdom's Action Plan¹

The UK's sixth action plan includes promising commitments on open contracting and aid transparency, building on efforts from previous action plans. Improvements in civil society-government relations helped restore the OGP process in the UK. Stakeholders could build on this momentum in the next action plan by addressing priority policy areas not covered in the sixth action plan, such as digital governance, freedom of information, beneficial ownership, open justice, and government transparency.

The UK's sixth action plan (2023-2025) has four commitments on open contracting, aid transparency, civic society engagement in anti-corruption measures, and transparency and inclusiveness of the UN Convention Against Corruption (UNCAC) review mechanism.² Commitment 1 on open contracting supports the implementation of the Procurement Act, expected to take effect in 2024. It involves establishing a new platform for data throughout the contracting process and passing secondary legislation to support the Procurement Act.³ Commitment 2 aims to make aid data available in a timely manner across all Official Development Assistance (ODA) departments, engaging civil society. It also aims to maintain momentum on quality and timeliness of data publishing following a temporary pause in publication following the merger of the Department for International Development and the Foreign and Commonwealth Office into the Foreign, Commonwealth and Development Office. The other commitments, while verifiable, lack concrete activities that would allow detailed analysis of their potential for results. For example, Commitment 3 includes civil society attendance at UNCAC events, but the influence civil society will have on anti-corruption efforts at UNCAC are unclear.

The Central Digital and Data Office (CDDO), which is part of the Cabinet Office, coordinated the development of the action plan. Civil society participation continued to be coordinated by the UK Open Government Civil Society Network (UK OGN). The multi-stakeholder forum (MSF) met quarterly to oversee the development of the action plan.⁴ The MSF comprised civil servants, members of the steering committee of the UK OGN, and subject matter specialists or network leaders.⁵ At each MSF meeting, there were between 30-50 participants.⁶ In February 2021, the UK was put under Procedural Review for acting contrary to the process for three action plans.⁷ However, for this action plan, the UK provided reasoned responses to stakeholder feedback, an improvement from the co-creation process of the previous action plan.

Civil society and government stakeholders acknowledged that the co-creation process for this action plan was better organised compared to previous action plans.⁸ According to the OGN chair, the quality of discussions between civil society and the government improved, and government partners were more engaged and informed throughout the process than in the

AT A GLANCE

Participating since: 2011
Number of commitments: 4

Overview of commitments:
Commitments with an open government lens: 4 (100%)
Commitments with substantial potential for results: 1 (25%)
Promising commitments: 2

Policy areas:
Carried over from previous action plans:

- Open contracting
- International aid transparency
- Engagement on anti-corruption

Emerging in this action plan:

- Transparency of UNCAC Review

Compliance with OGP minimum requirements for co-creation: Yes

previous co-creation process.⁹ The Parliamentary Secretary for the Cabinet Office, Alex Burghart MP, participated in the June 2023 MSF meeting, where stakeholders selected the commitments to take forward.¹⁰ The minister's presence at this juncture underscored the government's dedication to transparency and collaboration and signalled to civil society that decision-makers were fully briefed on stakeholder perspectives, nurturing a more informed decision-making process.¹¹

Despite a robust co-creation process, the action plan's scope is limited. This was attributed primarily to resource constraints and insufficient time for more comprehensive outreach to stakeholder groups.¹² The voluntary nature of stakeholder involvement, combined with limited resources and time constraints limited the opportunity to broaden participation. Effectively engaging in close and candid collaboration during co-creation sometimes proved challenging in these circumstances, but this was widely achieved with additional support were needed.¹³

The co-creation process also saw discussions around topics with strong demand for action, such as digital governance, freedom of information, beneficial ownership, open justice and government transparency.¹⁴ Ultimately, stakeholders deemed these topics untimely for inclusion in this action plan, but they are earmarked for consideration in the seventh action plan. Beneficial ownership was not included due to the inability to develop clear objectives within the allotted timeframe.¹⁵ The IRM recommends amending the action plan to incorporate a commitment on beneficial ownership transparency, potentially combining it with the work on anti-corruption. In December 2023, the UK government put out a public consultation on proposals to make information on trusts and their beneficial owners, in the context of land ownership, more publicly available.¹⁶ A commitment on the topic could focus on incorporating the views from the consultation, and specific action to improve the transparency of information on trusts holding lands. Additionally, potential commitments could encourage greater transparency across Crown Dependencies and British Overseas Territories in beneficial ownership to ensure consistency and transparency across all jurisdictions under the British Crown. This would be timely, given that many of the British Overseas Territories, as of December 2023, appear to be following the direction of the European Court of Justice and adopting the 'legitimate interest test' approach instead of implementing publicly accessible beneficial ownership registers.¹⁷

¹ The research for this report was completed in May 2024 and may not reflect subsequent developments.

² Open Government Partnership, UK Open Government Sixth National Action Plan 2024-2025, <https://www.gov.uk/government/publications/uk-national-action-plan-for-open-government-2024-2025/uk-national-action-plan-for-open-government-2024-2025>

³ The secondary legislation was passed on 22 May 2024.

⁴ Matthew Donnelly and Ben Gittins (Cabinet Office), interview by the IRM, 25 March 2024.

⁵ UK Open Government Network website, <https://opengovernment.org.uk/nap6/>

⁶ Kevin Keith, interview by the IRM, 22 February 2024.

⁷ Resolution of the Criteria & Standards Subcommittee regarding the Participation Status of the United Kingdom in OGP, <https://www.opengovpartnership.org/wp-content/uploads/2022/12/UK-Procedural-Review-Resolution-December-2022-CS-approved-Dec-20-2022.pdf>

⁸ Kevin Keith, interview by the IRM, 22 February 2024; Matthew Donnelly and Ben Gittins (Cabinet Office), interview by the IRM, 25 March 2024.

⁹ Kevin Keith, interview by the IRM, 22 February 2024.

¹⁰ Kevin Keith, interview by the IRM, 22 February 2024; Matthew Donnelly and Ben Gittins (Cabinet Office), interview by the IRM, 25 March 2024.

¹¹ Kevin Keith, interview by the IRM, 22 February 2024.

¹² Matthew Donnelly and Ben Gittins (Cabinet Office), interview by the IRM, 25 March 2024.

¹³ Matthew Donnelly and Ben Gittins (Cabinet Office), interview by the IRM, 25 March 2024.

¹⁴ Readout from the UK Multi-Stakeholder Forum on 22 June 2023, <https://opengovernment.org.uk/2023/07/19/6925/>

¹⁵ Matthew Donnelly and Ben Gittins (Cabinet Office), interview by the IRM, 25 March 2024.

¹⁶ UK Government, Transparency of land ownership involving trusts consultation, <https://www.gov.uk/government/consultations/transparency-of-land-ownership-involving-trusts-consultation>

¹⁷ <https://bvi.gov.vg/media-centre/government-virgin-islands-position-publicly-accessible-registers-beneficial-ownership>

Section II: Promising Commitments in the United Kingdom's 2023-2025 Action Plan

The following review looks at the two commitments that the IRM identified as having the potential to realise the most promising results. Promising commitments address a policy area that is important to stakeholders or the national context. They must be verifiable, have a relevant open government lens and have modest or substantial potential for results. This review also provides an analysis of challenges, opportunities and recommendations to contribute to the learning and implementation process of this action plan.

Table 1. Promising commitments

Promising Commitments
1: Open contracting: This commitment aims to deliver the Procurement Act 2023 and secondary legislation through a government Learning and Development Programme (L&D) and enhanced digital platform.
2: Aid Transparency: This commitment aims to strengthen transparency of UK Overseas Development Assistance (ODA) by publishing more aid data by government departments, engaging civil society and other stakeholders, and improving the UK's performance in external measures such as the Aid Transparency Index.

Commitment 1: Open contracting [Cabinet Office; Open Contracting Advisory Group]
For a complete description of the commitment, see Commitment 1 in the action plan [here](#).

Context and objectives:

A third of all public expenditure in the UK, about £300 billion, is spent on procuring goods and services annually.¹⁸ The UK has used past OGP action plans to enhance the transparency of how these funds are spent. In the fourth action plan (2019-2021), the government required all contracting authorities to implement the Open Contracting Data Standard (OCDS) for data on buyers, suppliers, contracts, spending and performance. This was expanded in the fifth action plan (2021-2023), where the government improved the quality of public contracting data and mainstreamed the OCDS on the national portal 'Contracts Finder.' Other objectives of the fifth action plan included creating a central digital platform with supplier registration functionality that is expected to replace Contracts Finder in due course,¹⁹ and introducing primary and secondary legislation accompanied by training and development to enforce heightened transparency in public procurement.²⁰

The commitment in the sixth action plan will extend these efforts. It aims to implement the Procurement Act 2023, which will replace the EU regulatory regime for public procurement in England, Wales and Northern Ireland. The Act received Royal Assent on 26 October 2023 and is expected to come into force in October 2024. Among other things, the Act aims to make it easier for small businesses and social enterprises to participate in public procurement, takes tougher action on underperforming suppliers, excludes suppliers who take unacceptable risks, and requires the publication of a wider range of procurement data from planning through to the implementation stage of procurement in a standard, open format using the OCDS. Other objectives of the commitment include developing secondary legislation to enable implementation of the Act, supported by a "Learning and Development Programme" for anyone whose work touches on procurement, including procurement and commercial practitioners and

suppliers. Lastly, the commitment will develop a civil society community of practice, hold a data use conference, and develop strategies for data use.

During the co-creation process, the working group for open contracting convened regularly to discuss the deliverables for the commitment. The working group was co-chaired by both a civil society representative and a Cabinet Office representative responsible for overseeing the implementation of the Procurement Act. The consultations for the commitment coincided with the drafting of the Procurement Act, where stakeholders could provide feedback on both the bill and the accompanying regulations. This alignment meant that the Cabinet Office was able to engage with diverse stakeholders. Stakeholders noted that the co-creation process for this commitment could be used as a model for engagement between government and civil society during co-creation.²¹

Potential for results: Substantial

The commitment's potential result is substantial, as it will transform the legislative framework governing procurement in the UK. Through a comprehensive overhaul of existing laws, the commitment will bolster accessibility, transparency and efficiency in procurement procedures. By consolidating fragmented procurement regulations into a coherent single legal framework, the Act simplifies compliance and promotes better understanding among businesses and suppliers.

The Procurement Act introduces a centralised digital platform that will, in time, consolidate the functionalities of Contracts Finder and Find a Tender Service into a single platform. Centralising registration, supplier information and Find a Tender (noticing) that will streamline the process of accessing all contracting-related data. This platform will provide access to a wealth of data at earlier stages, including information about the pipeline of contracts and later stages, offering insights into contract performance. Additionally, it could improve visibility into the identity of providers and contractors, consolidating notices and information for suppliers into a single accessible location. This comprehensive data ecosystem represents a significant advancement for transparency and management within UK government departments, which are often compartmentalised. Furthermore, the increased availability of information will give civil society a deeper understanding of contracting issues, facilitating greater engagement and advocacy.

The Procurement Act further streamlines the bidding process and introduces enhanced reporting requirements, significantly improving transparency. Additionally, the Act mandates authorities to publish post-award contract management reports on supplier performance against KPIs for contracts exceeding £5 million on the Find a Tender Service (FTS) at least every 12 months during the contract period. Furthermore, authorities are required to publish various notices on the FTS, including contract details and termination notices. These enhanced reporting requirements, now consolidated in one central place, are designed to instil trust in procurement processes, ensuring the responsible use of public funds.

The Procurement Act aims to foster fair competition, promote supplier diversity and enhance value for money. Notably, Section 68 of the Act mandates that SMEs receive timely payments within 30 days, aligning with the UK's prompt payment code.²² This addresses the issue of delayed payments, which adversely affect SMEs, as reported by Barclays in 2022, impacting 58 per cent of SMEs and posing financial burdens.²³ Additionally, authorities are obligated to publish payment compliance notices biannually.

The Procurement Act requires the publication of advertised tenders and contract details notice above the low value thresholds of £12,000 (central government) and £30,000 (all other contracting authorities) on the central digital platform rather than on Contracts Finder. Combined with the introduction of supplier information, allowing suppliers to store and submit their commonly used supplier information via the central digital platform, these measures enhance the visibility of business opportunities for SMEs, simplifies the tender process through the Central Digital Platform and reduces upfront costs for suppliers bidding for public contracts (e.g. by allowing evidence of required insurance cover at the point of contract award rather than during bidding, SMEs can avoid unnecessary upfront costs.).²⁴ The Act's noticing regime imposes a substantial increase in the obligation for contracting authorities to publish procurement information, offering suppliers enhanced visibility and opportunities for competitive positioning or legal action, particularly when mandatory notices reveal direct awards or beneficial contract modifications to competitors.

The potential benefits of the Procurement Act for SMEs are significant. Despite comprising approximately 99.9 per cent of private sector businesses,²⁵ SMEs received only 26.5 per cent of supply chain spending in the 2021-2022 financial year. In 2015, the UK government outlined its objective for £1 out of every £3 in procurement funding to be allocated to SMEs by 2020 to support small businesses and foster economic growth. However, the government has missed this target every financial year since. Facilitating transparency of the government procurement process through the Procurement Act is poised to help the UK achieve this objective.

The commitment will facilitate the delivery of the Act. For example, to facilitate compliance, the Act establishes the Procurement Review Unit (PRU), composed of independent procurement experts tasked with investigating potential challenges in procurement processes and offering advice. Additionally, the government has formed the National Security Unit for Procurement (NSUP) within the Cabinet Office, which aims to support the Act's provisions to exclude and bar suppliers posing a threat to national security.²⁶ This could enhance transparency and accountability by providing independent oversight and expertise in addressing procurement challenges and ensuring national security concerns are appropriately managed. This could promote fairness, integrity and public trust in the procurement process.

In tandem with the Act, efforts have been directed towards crafting secondary legislation to support the Act, with two consultations on draft regulations during the summer of 2023 and a report from the government on consultation on the draft regulations.²⁷ These regulations underwent parliamentary scrutiny, with the draft legislation laid before Parliament on 25 March 2024 and made on 22 May 2024. The Statutory Instrument (a form of secondary legislation) has been made available, bringing some elements of the Bill and the wider regime into effect.²⁸ The initial set of guidance on the Act deals with contracting authority and covers procurement definitions, valuations of contracts, thresholds and exempted contracts.²⁹

The commitment also includes the delivery of a Learning and Development (L&D) Programme to support those working within the new regime. This commenced in October 2023 with knowledge drops for contracting authorities and is ramping up throughout 2024 in preparation for enforcing the Act and regulations due to take effect in October 2024.³⁰ The other components of the L&D programme include self-guided e-learning modules for contracting

authorities to comprehensively understand each element of the new regime and deep-dive webinars for practitioners to gain expertise in operating within the new regime.³¹

Opportunities, challenges and recommendations during implementation

With the recent passing of the secondary legislation guiding the Procurement Act, the following recommendations are provided to facilitate implementation, ensure compliance, and optimize procurement processes. Firstly, there are concerns regarding the quality of data that will be integrated into the system.³² Secondly, uncertainties surround the adoption and response to Key Performance Indicators (KPIs) by contractors, highlighting the need for further examination of their effectiveness.³³ Thirdly, the involvement of third-party procurement data providers presents both opportunities and challenges. While effective management and updating of procurement data could enhance the system, delays or complexities in data input may pose obstacles, particularly for local councils reliant on third-party systems.³⁴ Additionally, despite provisions for training, the lack of additional resources and funding may hinder organisations, especially local government entities already facing resource constraints.

The effectiveness of the Act depends on stakeholders possessing adequate skills and technological resources to use available data effectively. There are concerns from civil society members regarding potential increases in compliance burdens for contracting authorities and suppliers.³⁵ Additionally, a notable gap exists between current procurement practices and governmental aspirations, prompting questions about the project's ambition. Addressing these concerns will be crucial for maximising the Act's potential impact on procurement transparency and efficiency. The IRM offers the following recommendations to the Cabinet Office:

- Continue to provide clear directions and guidance to contracting authorities on publishing data related to prospective and awarded contracts. This includes outlining guidelines for reporting information on the new contract database, evaluating outcomes and collecting supplier performance data. Additionally, the Cabinet Office has prepared clear guidance for all stakeholders regarding the information about contracts that will be publicly available, and the details included within the contracts themselves.³⁶ This could mitigate challenges associated with relying solely on guidance for interpretation.
- Ensure that third-party data providers are incentivised to facilitate seamless data integration into the central platform. Efficient monitoring mechanisms should be put in place to ensure that the administrators of the central digital platform enable data accessibility rather than become barriers to the process.³⁷
- Offer local entities an open-source software plug-in (API) to upgrade their own systems and comply with the new standards. This could enable local contracting authorities to efficiently integrate and harmonise their systems with the central platform, ensuring uniformity in data reporting and compliance with the Act's requirements.
- Continue to train relevant individuals within contracting authorities on the requirements of the Procurement Act. This will ensure adequate financial and human resources are available during implementation, particularly for training and skills development for both commercial and technical aspects. Additionally, support could be provided to other levels of government to encourage their engagement in the initiative, recognising that effective data use and strategy implementation will require the involvement of a wide range of public bodies.

- Articulate plans for managing the transition from the Public Contracts Regulations 2015 to the Procurement Act, including timelines, cost implications and resource requirements.
- Develop a process for managing the performance of the central digital platform, including mechanisms for addressing non-compliance and data gaps. Currently, the system lacks a designated body or process for comprehensive monitoring. Consider establishing an effective review system, such as a specialist tribunal or extending the power of the PRU to implement regular reporting on the system's performance, identifying areas of data deficiency and highlighting exemplary practices. Additionally, to ensure the consistent application of transparency standards, offer comprehensive guidance to contracting authorities on navigating disclosure obligations, particularly regarding sensitive commercial information.
- Provide ongoing support for businesses and suppliers as they adapt to the new environment, including assistance in managing risks associated with the new noticing regime. This could include addressing concerns about the publication of unsuccessful bidders' identities before the standstill period and ensuring transparency and fairness in the publication of performance against KPIs and breach notices.
- Maintain engagement with civil society and the central government to ensure ongoing collaboration and support for the initiative.³⁸

Commitment 2: Aid Transparency [FCDO; Bond Transparency Working Group³⁹]
For a complete description of the commitment, see Commitment 2 in the action plan [here](#).

Context and objectives:

The UK has historically set a high standard for Overseas Development Assistance (ODA) transparency through policies like the Integrated Review of Security, Defence, Development, and Foreign Policy and the International Development Strategy (IDS). However, changes in government department structures, such as the establishment of the Foreign, Commonwealth & Development Office (FCDO) and the split of the Department for Business, Energy and Industrial Strategy (BEIS), necessitated new aid transparency processes. Assessments and accountability mechanisms, particularly the Aid Transparency Index and the IDS, primarily focus on the FCDO, leaving other departments underrepresented. Furthermore, challenges in data use and the transition within the International Aid Transparency Initiative (IATI) Secretariat have highlighted the need to enhance transparency and accountability in aid delivery.⁴⁰

This commitment aims to continue improvements in aid data published by government departments, engage civil society and other stakeholders, and improve the UK's performance in external measures such as the Aid Transparency Index. The commitment encompasses data from the British International Investment (BII), the UK's private development financial institution, for the first time. The FCDO will support the BII roadmap to improve the amount of information made public.⁴¹ Other milestones focus on maintaining the monthly publication timeline of FCDO aid data before the changes in government department structures through platforms like IATI and DevTracker. Key strategic documents, such as Country Development Partnership Summaries, will be updated or published in a timely manner.⁴² The commitment also involves facilitating civil society scrutiny of ODA expenditure and soliciting their feedback on the UK's approaches for aid transparency.

The commitment was developed collaboratively between the government and civil society. Drawing on lessons from the IRM UK Co-Creation Brief and the fifth action plan, the working group identified areas for improvement.⁴³ Positive strides were made in coordinating with other IATI donors, though challenges in data quality and technical feedback were acknowledged as goals to address in the commitment. Input from an open call for ideas helped identify challenges and potential solutions. Independent assessments, including the 2020 review of UK government ODA-spending departments and the 2022 global Aid Transparency Index, also informed discussions on the commitment.

Potential for results: Modest

The commitment could improve the quality, timeliness and use of aid data. For the FCDO to become a top performer in the 2024 Aid Transparency Index (moving from the 'good' to the 'very good' category) it will require discernible changes at the organisational, country and programme levels.⁴⁴ At the organisational level, enhancements envisaged include heightened transparency on strategic priorities, exemplified by the publication of an international development strategy, along with forward-looking financial allocations for the 2024/2025 fiscal year (both of which were unavailable during the last assessment).⁴⁵ Efforts at the country level are aimed at the dissemination of country development partnership summaries that set the goals for partnerships for priority countries.⁴⁶ These summaries delineate key spending areas, strategic priorities, programmatic interventions and financial allocation plans for the countries.

Additionally, the commitment could augment data quality across programme and project levels. Whereas previously, project descriptions were automatically generated based on other data that was filled in, they are now manually populated to include quality information for data users on what the UK aims to achieve with the projects. Other notable changes include the enhanced disclosure of condition documents. This makes it easier for data users to find conditions on programmes and increases disclosures of condition documents, and disclosure of location, which is the activity scope of a programme, making it clear where programmes are focused at the national or regional level. This will make it easier for data users to identify the impacts of the programme. Additionally, they support the UK's aspiration to achieve a 'very good' rating and enhance data quality, providing valuable insights into donor priorities, expenditure patterns, partnerships and project focal points.⁴⁷ Improving data quality will ultimately empower users to hold stakeholders accountable and drive better development outcomes.

The commitment extends the UK's domestic publishing practices and engages globally to address broader data access and usage issues. Key milestones focus on tackling technical barriers to data access and providing user training to enhance stakeholders' capacity, including current and potential data users. This approach involves working closely with government officials in various countries to familiarise them with the utility of IATI data, facilitating meetings with civil society and bridging connections between government bodies and local CSOs to promote independent or collaborative use of IATI data at a national level. Government officials will receive comprehensive training on understanding IATI data, using relevant tools for data extraction, leveraging this information to inform their roles in programme implementation or policy formulation, and checking what other donors are doing in the country to assist coordination. The pilot of this training is planned for Colombia.⁴⁸ By equipping staff with the necessary government officials and knowledge of IATI data and its potential benefits, the UK will demonstrate leadership in promoting data transparency and coordinating development initiatives globally.

Despite the potential for improving the quality and use of aid data, this commitment is considered modest due to the focus on reviews and assessments rather than substantive implementation. For instance, while the FCDO plans to engage other IATI donor publishers to share good practices (Deliverable Five) and participate in the review of the IATI Strategic Plan, these actions emphasise evaluation over actionable change. Similarly, the milestones include providing in-country training on IATI data use (Deliverable Four) and engaging with civil society to explore feedback and technical issues. However, these activities, such as meeting annually to review strategic priorities (Deliverable Three) and responding to the UK Aid Transparency Review without concrete implementation commitments, emphasise planning and assessment over direct impact. Consequently, while these steps are crucial for laying the groundwork, the lack of firm commitments to execute the recommendations limits the overall potential for substantial results.

Opportunities, challenges and recommendations during implementation

While aid transparency is not novel for the UK, this commitment serves as a safeguard against other competing priorities, directing focus on to the FCDO and other departments. Challenges around data quality and monitoring and evaluation could also complicate the implementation.

To ensure strong implementation, the IRM offers the following recommendations to the FCDO:

- Foster ongoing collaboration between government entities, civil society and international partners to ensure diverse perspectives are integrated into the implementation process.
- Provide comprehensive training and support programmes for government officials and other stakeholders to enhance their understanding and usage of aid transparency data.
- Assess the impact of in-country training on IATI data use. This could involve conducting knowledge assessments, collecting case studies where IATI data is used and tracking different ways FCDO data is used at the country level. Establish a feedback mechanism to improve FCDO and other department data quality and access, engage new data users with training and provide regular updates on progress.
- Facilitate knowledge sharing and peer learning among donor-priority countries and stakeholders to exchange best practices, lessons learned and innovative approaches in aid transparency and data usage. Offer technical assistance to countries facing challenges in adopting aid transparency practices, such as developing data infrastructure, improving data quality and addressing capacity gaps.

Other commitments

Other commitments that the IRM did not identify as promising commitments are discussed below but have not been reviewed in greater detail. This review provides recommendations to contribute to the learning and implementation of these commitments.

Commitment 3 seeks to formalise civil society involvement in implementing the UK Anti-corruption Strategy (ACS) through quarterly meetings between the UK Anti-Corruption Coalition and the Joint Anti-Corruption Unit (JACU). It also aims to appoint civil society representatives, as was the case in 2023, to accompany the UK delegation to the 2025 Conferences of States Parties (COSP) to the United Nations Convention against Corruption (UNCAC). This commitment intends to send a message to COSP members that the UK supports civil society involvement in the UNCAC.⁴⁹ During the co-creation process, government representatives indicated a desire to

focus efforts on finalising the ACS. This resulted in some milestones reflecting routine (but important) practices, such as the quarterly meetings between the UK Anti-Corruption Coalition and JACU. The quarterly meetings are also a place for sharing information and discussion on emerging anti-corruption and illicit finance concerns. Civil society was nonetheless content with the outcome.⁵⁰

Attending UNCAC proceedings gives civil society a deeper understanding of the negotiation dynamics and potential barriers and could open opportunities for networking and collaboration with representatives from other countries in combating corruption. Moreover, civil society often possesses technical expertise for a more informed approach to addressing corruption.⁵¹ However, there is a need to clarify the influence civil society representatives will have at UNCAC COSP and how their attendance will benefit anti-corruption efforts, though this is largely shaped by existing UN processes around civil society involvement in UNCAC. While developing the ACS, a number of workshops were held to understand civil society perspectives on a range of policy areas.⁵² Further development of an ACS, including engagement with civil society and other stakeholders, will be taken forward by the new Government. According to the Home Office, civil society has expressed an interest in a more reciprocal exchange of information, to better understand how their contributions inform the ACS and the rationale for any rejected recommendations.⁵³ The IRM recommends possibly amending this commitment to include both the development and implementation of the ACS. This aligns with the ongoing efforts of civil society and the government to finalise the ACS, ensuring that progress is accurately tracked.

Commitment 4 aims to strengthen the outcomes of the UNCAC, the foundational global treaty in combating corruption. The UK government and civil society will collaborate with the UNCAC Coalition and OGP to assemble a coalition of nations dedicated to advancing transparency and inclusivity within the UNCAC's implementation review process.⁵⁴ So far, 61 countries have joined the commitment.⁵⁵ The milestones entail publishing timelines for how civil society can engage in the review and follow up process and the final report of the UK's next review. One of the milestones was completed before the start of this action plan (the UNCAC COSP, which happened in December 2023). Furthermore, some of the milestones may extend beyond the action plan's timeline. The current UN review cycle is expected to conclude in June 2026, and the date of the beginning of the next Implementation Review Mechanism cycle is not yet known.⁵⁶ Consequently, the UK's ability to fully implement this commitment is contingent on external factors.

While these efforts align with past UK actions,⁵⁷ the challenge lies in rallying more countries to join this initiative. Stakeholders could amend this commitment with concrete steps to engage broader international participation, such as diplomatic outreach, capacity-building programmes, and collaboration frameworks aimed at fostering a global coalition dedicated to enhancing transparency and inclusivity in anti-corruption efforts under the UNCAC. The potential amendment to this commitment could also outline how substantive changes will result from the review. Moreover, the UK needs to appoint an Anti-Corruption Champion, a role that has been vacant since John Penrose MP's resignation in June 2022.⁵⁸ This Champion would coordinate anti-corruption efforts, advocate for policies nationally and internationally, and engage civil society and international partners. This appointment would demonstrate the UK's commitment to combatting corruption and ensure a coordinated approach to achieving Commitment 4's objectives.

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- ³⁴ Ruairi Macdonald, interview by the IRM, 25 April 2024.
- ³⁵ Ruairi Macdonald, interview by the IRM, 25 April 2024.
- ³⁶ Cabinet Office, Procurement Act 2023 - Guidance documents, <https://www.gov.uk/government/collections/procurement-act-2023-guidance-documents>
- ³⁷ Ruairi Macdonald, interview by the IRM, 25 April 2024.
- ³⁸ Ruairi Macdonald, interview by the IRM, 25 April 2024.
- ³⁹ An alliance of organisations, including [Publish What You Fund](#), [Save the Children](#), and [Development Initiatives](#).
- ⁴⁰ UK Government, Sixth National Action Plan for Open Government 2024-25, <https://www.gov.uk/government/publications/uk-national-action-plan-for-open-government-2024-2025>
- ⁴¹ British International Investment, We've published a new roadmap on transparency, 23 December 2023, <https://www.bii.co.uk/en/news-insight/news/weve-published-a-new-roadmap-on-transparency/>
- ⁴² Eleanor Morgan (FCDO), interview by the IRM, 8 March 2024.
- ⁴³ Eleanor Morgan (FCDO), interview by the IRM, 8 March 2024.
- ⁴⁴ Eleanor Morgan (FCDO), interview by the IRM, 8 March 2024.
- ⁴⁵ Eleanor Morgan (FCDO), interview by the IRM, 8 March 2024.
- ⁴⁶ UK Government, Published Country Development Partnership Summaries, <https://www.gov.uk/government/collections/country-and-regional-development-partnership-summaries>
- ⁴⁷ The 2024 Aid Transparency Index published in July 2024 indicated that the FCDO has rejoined the “very good” category, fulfilling one of the milestones of this commitment. See https://www.publishwhatyoufund.org/app/uploads/dlm_uploads/2024/07/2024-Aid-Transparency-Index-Report.pdf
- ⁴⁸ Eleanor Morgan (FCDO), interview by the IRM, 8 March 2024.
- ⁴⁹ Cabinet Office, interview by the IRM, 13 March 2024.
- ⁵⁰ Peter Munro (UK Anti-Corruption Coalition), interview by the IRM, 8 April 2024.
- ⁵¹ Peter Munro (UK Anti-Corruption Coalition), interview by the IRM, 8 April 2024.
- ⁵² Information provided to the IRM by the Home Office during the pre-publication review of this report, 17 June 2024.
- ⁵³ Information provided to the IRM by the Home Office during the pre-publication review of this report, 17 June 2024.

⁵⁴ UK Government, Sixth National Action Plan for Open Government 2024-25,

<https://www.gov.uk/government/publications/uk-national-action-plan-for-open-government-2024-2025>

⁵⁵ Ruth Walker (FCDO), interview by the IRM, 12 March 2024.

⁵⁶ Ruth Walker (FCDO), interview by the IRM, 12 March 2024.

⁵⁷ Ruth Walker (FCDO), interview by the IRM, 12 March 2024.

⁵⁸ Transparency International UK, Resignation of PM's anti-corruption champion sounds alarm over integrity on politics,

<https://www.transparency.org.uk/resignation-pms-anti-corruption-champion-sounds-alarm-over-integrity-politics>

Section III. Methodology and IRM Indicators

The purpose of this review is not an evaluation. It is intended as a quick, independent, technical review of the characteristics of the action plan and the strengths and challenges the IRM identifies to inform a stronger implementation process. The IRM highlights commitments that have the highest potential for results, a high priority for country stakeholders, a priority in the national open government context, or a combination of these factors.

The three IRM products provided during a national action plan cycle include:

- **Co-Creation Brief:** A concise brief that highlights lessons from previous IRM reports to support a country's OGP process, action plan design and overall learning.
- **Action Plan Review:** A technical review of the characteristics of the action plan and the strengths and challenges IRM identifies to inform a stronger implementation process.
- **Results Report:** An overall implementation assessment that focuses on policy-level results and how changes happen. It also checks compliance with OGP rules and informs accountability and longer-term learning.

In the Action Plan Review, the IRM follows a filtering and clustering process to identify promising reforms or commitments:

Step 1: Determine what is reviewable based on the verifiability of the commitment as written in the action plan.

Step 2: Determine if the commitment has an open government lens. Is it relevant to OGP values?

Step 3: Review commitments that are verifiable and have an open government lens to identify if certain commitments need to be clustered. Commitments that have a common policy objective or contribute to the same reform or policy issue should be clustered. The potential for results of clustered commitments should be reviewed as a whole. IRM staff follow these steps to cluster commitments:

- a. Determine overarching themes. If the action plan is not already grouped by themes, IRM staff may use OGP's thematic tagging as reference.
- b. Review commitment objectives to identify commitments that address the same policy issue or contribute to the same broader policy or government reform.
- c. Organise commitments into clusters as needed. Commitments may already be organised in the action plan under specific policy or government reforms.

Step 4: Assess the potential for results of the clustered or standalone commitment.

Filtering is an internal process. Data for individual commitments is available in Annex 1. In addition, during the internal review process of this product, the IRM verifies the accuracy of findings and collects further input through peer review, OGP Support Unit feedback as needed, interviews and validation with country stakeholders, an external expert review, and oversight by IRM's International Experts Panel (IEP).

As described earlier, IRM relies on **three key indicators** for this review:

I. Verifiability

- **Yes, specific enough to review:** As written in the action plan, the stated objectives and proposed actions are sufficiently clear and include objectively verifiable activities to assess implementation.
- **No, not specific enough to review:** As written in the action plan, the stated objectives and proposed actions lack clarity and do not include explicitly verifiable activities to assess implementation.
- Commitments that are not verifiable will be considered not reviewable, and further assessment will not be carried out.

II. Open government lens

This indicator determines if the commitment relates to the open government values of transparency, civic participation or public accountability as defined by the Open Government Declaration and the OGP Articles of Governance by responding to the following guiding questions. Based on a close reading of the commitment text, the IRM first determines whether the commitment has an open government lens:

- **Yes/No:** Does the commitment set out to make a policy area, institution or decision-making process more transparent, participatory or accountable to the public?

The IRM uses the OGP values as defined in the Articles of Governance. In addition, the following questions for each OGP value may be used as a reference to identify the specific open government lens in commitment analysis:

- **Transparency:** Will the government disclose more information, improve the legal or institutional frameworks to guarantee the right to information, improve the quality of the information disclosed to the public or improve the transparency of government decision-making processes or institutions?
- **Civic Participation:** Will the government create or improve opportunities, processes or mechanisms for the public to inform or influence decisions? Will the government create, enable or improve participatory mechanisms for minorities or underrepresented groups? Will the government enable a legal environment to guarantee freedoms of assembly, association and peaceful protest?
- **Public Accountability:** Will the government create or improve opportunities to hold officials answerable for their actions? Will the government enable legal, policy or institutional frameworks to foster accountability of public officials?

III. Potential for results

The IRM adjusted this indicator—formerly known as the “potential impact” indicator—to take into account the feedback from the IRM Refresh consultation process with the OGP community. With the new results-oriented strategic focus of IRM products, the IRM modified this indicator to lay out the expected results and potential that would be verified in the IRM Results Report after implementation. Given the purpose of this Action Plan Review, the assessment of potential for results is only an early indication of the possibility the commitment has to yield meaningful results based on its articulation in the action plan in contrast with the state of play in the respective policy area.

The scale of the indicator is defined as:

- **Unclear:** The commitment is aimed at continuing ongoing practices in line with existing legislation, requirements or policies without indication of the added value or enhanced open government approach in contrast with existing practice.
- **Modest:** A positive but standalone initiative or change to processes, practices or policies. The commitment does not generate binding or institutionalised changes across government or institutions that govern a policy area. Examples are tools (e.g., websites) or data release, training or pilot projects.
- **Substantial:** A possible game changer for practices, policies or institutions that govern a policy area, public sector or the relationship between citizens and state. The commitment generates binding and institutionalised changes across government.

This review was prepared by the IRM in collaboration with an independent researcher and was reviewed by Ernesto Velasco Sánchez, IRM external expert. The IRM methodology, quality of IRM products and review process are overseen by IRM's IEP. For more information, see the IRM Overview section of the OGP website.⁵⁹

⁵⁹ Open Government Partnership, IRM Overview, <https://www.opengovpartnership.org/irm-guidance-overview/>

Annex 1. Commitment by Commitment Data⁶⁰

<p>Commitment 1: Open contracting.</p> <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Substantial
<p>Commitment 2: International aid transparency.</p> <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Modest
<p>Commitment 3: Engagement on anti-corruption.</p> <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Unclear
<p>Commitment 4: UN Convention Against Corruption.</p> <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Unclear

⁶⁰ **Editorial notes:**

1. For commitments that are clustered, the assessment of potential for results is conducted at the cluster level, rather than the individual commitments.
2. Commitment short titles may have been edited for brevity. For the complete text of commitments, please see the UK's action plan: <https://www.opengovpartnership.org/wp-content/uploads/2023/12/United-Kingdom-Action-Plan-2023-2025-December.pdf>

Annex 2: Action Plan Co-Creation

OGP member countries are encouraged to aim for the full ambition of the OGP Participation and Co-Creation Standards that came into force on 1 January 2022.⁶¹ The IRM assesses all countries that submitted action plans from 2022 onward under the updated standards. Table 2 outlines the extent to which the countries' participation and co-creation practices meet the minimum requirements that apply during development of the action plan.

OGP instituted a 24-month grace period to ensure a fair and transparent transition to the updated standards. Action plans co-created and submitted by 31 December 2023 fall within the grace period. The IRM will assess countries' alignment with the standards and their minimum requirements.⁶² However, countries will only be found to be acting contrary to process if they do not meet the minimum requirements for action plans co-created in 2024 and onwards.

Please note that, according to the OGP National Handbook, countries implementing four-year action plans must undertake a refresh process at the two-year mark. Countries are expected to meet minimum requirements 3.1 and 4.1 during the refresh process.⁶³ IRM assessment of the refresh process will be included in the Results Report.

Table 2. Compliance with minimum requirements

Minimum requirement	Met during co-creation?	Met during implementation?
1.1 Space for dialogue: A multi-stakeholder (MSF) forum exists. The MSF met quarterly during the co-creation period. One of the meetings was in person, while three were remote. ⁶⁴ The basic rules for the MSF are public. ⁶⁵ The Open Government Network (OGN) continued to coordinate civil society participation in the OGP process. The OGN is an important interlocutor between the government and civil society.	Yes	<i>To be assessed in the Results Report</i>
2.1 OGP website: The OGN maintains a publicly available website that contains the latest action plan. ⁶⁶	Yes	<i>To be assessed in the Results Report</i>
2.2 Repository: The UK OGN website serves as the UK's OGP online repository. It is updated frequently and contains key information on the co-creation process. ⁶⁷	Yes	<i>To be assessed in the Results Report</i>
3.1 Advanced notice: The co-creation timeline was published by the OGN co-chair on 28 April 2023 on the UK's OGP website two weeks before the call for ideas opened (12 May 2024). ⁶⁸	Yes	Not applicable
3.2 Outreach: The UK OGN put out a public call to solicit ideas for the action plan, whilst the Cabinet Office reached out to other parts of government. ⁶⁹ They reached out through traditional media, social media and networks such as anti-corruption coalitions. Efforts were made to reach groups not traditionally involved in the OGP process, such as youth groups, working class groups and migrants. ⁷⁰	Yes	Not applicable
3.3 Feedback mechanism: A public consultation was open for a month, between 12 May and 12 June 2023. Over 90 ideas were received from civil society and some of the ideas are visible on the repository. ⁷¹	Yes	Not applicable
4.1 Reasoned response: The contributions from the public were documented. ⁷² The Cabinet Office organised an online Open Government meet up on 3 August 2023 to share which commitments	Yes	Not applicable

<p>were progressing and why.⁷³ Furthermore, the OGN chair sent letters to stakeholders with the MSF’s decision on whether their proposed commitments had been included in the action plan.⁷⁴</p>		
<p>5.1 Open implementation: The IRM will assess whether meetings were held with civil society stakeholders to present implementation results and enable civil society to provide comments in the Results Report.</p>	<p>Not applicable</p>	<p><i>To be assessed in the Results Report</i></p>

The co-creation process kicked off at a stakeholder meeting on 18 January 2023 to plan the rules of engagement for co-creation.⁷⁵ The OGN published the timeline to develop the plan and a call for ideas.⁷⁶ Over 90 ideas were received from civil society.⁷⁷ The Central Digital and Data Office (CDDO) conducted an initial assessment of the ideas to determine their potential to progress to the co-creation phase, and a report to support the discussion at the June MSF meeting.⁷⁸ Following the June meeting, the government hosted an open forum with almost 50 civil society representatives where it shared which commitments were progressing and why.⁷⁹

During the October MSF meeting, there was a robust discussion and clear understanding of which draft commitments to prioritise.⁸⁰ While civil society members did not achieve all their desired outcomes, there was enough agreement to move forward. Each topic taken forward had a thematic working group, although these groups varied across commitments.⁸¹ For example, open contracting had an established group from previous action plans, while the working group for aid transparency was formed during the co-creation process.⁸² While there were no formal working groups for Commitments 3 and 4, civil society and government were represented in the discussions around these commitments.⁸³

During the October MSF meeting, the government presented the option of lengthening the drafting of the action plan to 28 February 2024, instead of by 31 December 2023, per the OGP National Handbook, to strengthen the commitments. Civil society and the government expressed concerns that not meeting the publication deadline would detract from the UK’s re-engagement in OGP.⁸⁴ The government and civil society resolved that in the best interest of the UK, the action plan would be published in December 2023 in accordance with the OGP National Handbook. The action plan was published on 18 December 2023.⁸⁵

During the co-creation process, two issues emerged: a lack of resources⁸⁶ and limited time.⁸⁷ The OGN co-chair noted that the outreach phase, including the analysis, would have benefited from more time to facilitate deeper collaboration and well-informed decision-making. Additionally, they highlighted that financial resources for co-creation were limited.⁸⁸ For example, there was no allocated budget for proper outreach. Allocating additional resources, including budgetary provisions, to support comprehensive outreach activities is imperative.⁸⁹ This would involve collective action to prioritise funding for outreach, enabling broader stakeholder engagement and fostering a more inclusive decision-making process.

⁶¹ Open Government Partnership, 2021 OGP Participation and Co-Creation Standards, <https://www.opengovpartnership.org/ogp-participation-co-creation-standards/>

⁶² Open Government Partnership, IRM Guidelines for the Assessment of Minimum Requirements, <https://www.opengovpartnership.org/documents/irm-guidelines-for-the-assessment-of-minimum-requirements/>

⁶³ Open Government Partnership, OGP National Handbook 2022, Section 2.3, <https://www.opengovpartnership.org/documents/ogp-national-handbook-rules-and-guidance-for-participants-2022/>

⁶⁴ Kevin Keith, interview by the IRM, 22 February 2024.

- ⁶⁵ UK Cabinet Office, Multi-stakeholder forum for open government, The January 2023 MSF slide deck includes discussions about the role of the MSF, <https://opengovernment.org.uk/wp-content/uploads/2023/03/2023-01-18-MSF-Slide-deck.pdf>
- ⁶⁶ UK OGP website, <https://opengovernment.org.uk>
- ⁶⁷ UK Open Government Network, Sixth National Action Plan repository, <https://opengovernment.org.uk/nap6/>
- ⁶⁸ UK Open Government, Sixth National Action Plan Co-creation timeline, <https://opengovernment.org.uk/2023/04/28/timeline-for-the-uks-6th-open-government-plan-unveiled/>
- ⁶⁹ UK Open Government, Public call for ideas for Sixth National Action Plan, <https://opengovernment.org.uk/2023/05/12/big-ideas-wanted-for-plan-to-improve-government/>
- ⁷⁰ Kevin Keith, interview by the IRM, 22 February 2024.
- ⁷¹ Consultation responses, <https://docs.google.com/spreadsheets/d/1duQFTAZIGriV52jPL6ZJgmXivMiwZ1DoEzxD5pNfz1c/edit?pli=1#gid=814772842>
- ⁷² Contribution from stakeholders for Sixth National Action Plan, <https://docs.google.com/spreadsheets/d/1duQFTAZIGriV52jPL6ZJgmXivMiwZ1DoEzxD5pNfz1c/edit#gid=814772842>
- ⁷³ UK Open Government Network, Sixth National Action Plan repository, <https://opengovernment.org.uk/nap6/>
- ⁷⁴ Kevin Keith, interview by the IRM, 22 February 2024.
- ⁷⁵ UK Open Government, Readout from the UK Multi-Stakeholder Forum on 18 January 2023, <https://opengovernment.org.uk/2023/03/06/uk-read-out-from-the-uk-multi-stakeholder-forum-wednesday-18th-january-2023/>
- ⁷⁶ UK OGN website, <https://opengovernment.org.uk/nap6/>
- ⁷⁷ Google sheet including ideas received from civil society for NAP6, <https://docs.google.com/spreadsheets/d/1duQFTAZIGriV52jPL6ZJgmXivMiwZ1DoEzxD5pNfz1c/edit#gid=814772842>
- ⁷⁸ UK OGN website, <https://opengovernment.org.uk/nap6/>
- ⁷⁹ UK OGN website, <https://opengovernment.org.uk/nap6/>
- ⁸⁰ Kevin Keith, interview by the IRM, 22 February 2024.
- ⁸¹ Matthew Donnelly and Ben Gittins (Cabinet Office), interview by the IRM, 25 March 2024.
- ⁸² Matthew Donnelly and Ben Gittins (Cabinet Office), interview by the IRM, 25 March 2024.
- ⁸³ Peter Munro, interview by the IRM, 8 April 2024.
- ⁸⁴ UK Open Government, Readout from the UK Multi-Stakeholder Forum on 18 October 2023, <https://opengovernment.org.uk/2023/11/24/uk-multi-stakeholder-forum-read-out-18th-october-2023/>
- ⁸⁵ UK OGN website, <https://opengovernment.org.uk/nap6/>
- ⁸⁶ Kevin Keith, interview by the IRM, 22 February 2024.
- ⁸⁷ Eleanor Morgan (FCDO), interview by the IRM, 8 March 2024.
- ⁸⁸ Kevin Keith, interview by the IRM, 22 February 2024.
- ⁸⁹ Kevin Keith, interview by the IRM, 22 February 2024.