The UK Government's Strategy for International Development

Bond's analysis of what it says and what needs to happen next

05 July 2022

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Bond is the civil society network for global change. We bring people together to make the international development sector more effective.

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Introduction

The UK government published its strategy for international development in May 2022, which sets out its approach to international development over the following decade. This paper analyses the strategy and makes some suggestions for next steps.

This is the first international development strategy since the creation of the Foreign, Commonwealth and Development Office (FCDO) and the publication of the Integrated Review in 2020. It comes following a turbulent few years marked by a change in foreign secretary, significant budget cuts, a reorganisation of senior officials and two major foreign policy and humanitarian crises - in Afghanistan and then Ukraine.

This paper analyses the content of the strategy and makes some suggestions for its implementation. It first reviews the most significant changes in the UK government's approach to development assistance, before analysing each of the strategy's four priorities: trade and investment, women and girls, humanitarian action, and climate, nature and global health. The paper will then discuss other parts of the strategy that are most relevant to civil society beyond the priorities and in how the UK government plans to deliver the strategy.

It was written in consultation with the members of Bond's working groups, including the Child Rights, Conflict Policy, Disability and Development, Humanitarian Policy, Sustainable Development Goals and Transparency Groups. The paper also draws on expert analysis from Action for Global Health (AFGH), Climate Action Network UK (CAN-UK), the Gender and Development Network (GADN) and the Trade Justice Movement (TJM).

A change in direction

The strategy is a political document that has clearly been shaped by the current geopolitical context, especially the rising influence of China and the war in Ukraine. It repositions development as a means of realising wider foreign policy objectives. Interventions are justified throughout as being in the UK's economic and security interests. The strategy is also clearly informed and rooted in the worldview of the current foreign secretary, as indicated by the strong focus on freedom and prosperity, as well as the prioritisation of trade and investment.

It confirms that poverty reduction is no longer at the heart of the UK government's approach to development, which is deeply concerning. Pillars of the former poverty reduction agenda, such as the Sustainable Development Goals (SDGs), "leave no one behind" and transparency are barely mentioned, while others such as human rights and civic space are conspicuous by their absence.

However, there are positive references to the importance of local ownership and self-determination, a recognition that development is a long-term endeavour that requires us to tackle structural problems and the root causes of crises, and a commitment to do this in partnership with civil society. This paves the way for the UK government to undertake a broader shift towards locally led development, which is welcome and necessary.

The strategy is based on "a whole of government approach" but it also stresses the importance of working with "UK expertise, business, civil society networks, research partnerships and technology capabilities" to realise development outcomes (p4). We particularly welcome the commitment to "draw upon the expertise of the private sector, civil society and academia to advise and challenge us on implementation" (p30). Meaningful, inclusive and deliberative engagement with civil society will be crucial to ensuring the successful and effective delivery of the strategy, as will investment in and the use of research and data to ensure policies and programmes are evidence-based.

It is based around four main priorities: trade and investment, women and girls, humanitarian action, and climate, nature and global health. While it has a clear focus, there is limited detail and few financial commitments, which makes the strategy difficult to assess. There is also a lack of goals and targets throughout. As a result, it appears to be more of a general vision for development.

Overall, it marks a significant change in direction for UK development policy. The major shifts are:

- **Development is now explicitly a tool of foreign policy:** The most significant shift is the clear assertion that "our development work must form an increasingly key part of a coherent UK foreign policy" (p4). The strategy appears to be about using development to increase western influence in the face of a hostile Russia and rising China, combatting "malign influence and aggression" (p26) and creating alternative sources of investment. While it's important that the UK's approaches to diplomacy and development are coherent, decisions about development assistance should always be needs-based.
- **The focus is on prosperity rather than poverty reduction:** The alleviation of poverty should be at the heart of any development strategy, but it is barely mentioned. While there is a focus on "unleashing the potential of people," giving them "more power and choice" and supporting "populations to become more prosperous, peaceful and healthier" (p5), references to tackling inequality and putting the furthest behind first are weak. However, the strategy includes a commitment to spend the majority of Official Development Assistance (ODA) in low-income countries, and there is continued support for the commitment to spend 0.2% of GNI on Least Developed Countries.
- **It moves to a trickle-down approach to development:** At its centre is a commitment to support partner countries to grow their economies sustainably through trade and investment partnerships. The prominent focus on trade, investment and prosperity in the strategy suggests a return to trickle-down development, where it is assumed the benefits of wealth creation will gradually filter through an economy, rather than providing direct support to those who are most marginalised, (e.g. women and girls, children and young people, older people, people from religious minorities and racialised groups, LGBTQI + people, refugees and displaced people, and people with disabilities). Foreign Direct Investment (FDI) in lower-income countries does not guarantee sustainable development; moreover, FDI often concentrates investments in sectors such as oil and gas, telecommunications, financial services and real estate. It has been shown to further inequality and without proper safeguards, which can result in forced displacement, environmental damage and exploitative working conditions.
- **There is limited mention of the SDGs and "leave no one behind":** The SDGs provide an important global framework for development, yet they are barely mentioned in the strategy. While the strategy recommits the UK to achieving the SDGs, it does not set out how ODA will be aligned with the SDGs. While some of the priorities may ultimately contribute to progress towards certain SDGs, this is not clearly mapped out, and there is little attention paid to policy coherence to ensure actions in one area do not undermine progress in another. The

promise to "leave no one behind" sits at the heart of the SDG agenda, but there is a lack of clarity in where the UK's previous strong commitment to this stands. Though mentioned in passing, the strategy does not explicitly recommit the UK to delivering this promise or make it clear how it will do this in a way that is practical for decision-making. The strategy also fails to prioritise disability and live up to the promise of the FCDO's new Disability, Inclusion and Rights Strategy which was only published in February 2022. Consequently, it risks undermining the progress and commitments made by the UK on disability in recent years.

- **Open societies feature in the framing but are no longer a priority:** Supporting freedom and democracy to flourish in the face of tyranny is central to the framing of the strategy, as is the desire to build "accountable institutions" and "free and open societies". Yet there are no specific commitments. Civic space and human rights are conspicuous by their absence. The need to strengthen open societies by protecting human rights, press freedom and civic space was central to the Integrated Review and the UK's G7 agenda and it featured as one of the seven priorities identified in the UK's 2020 spending commitments published following the merger. While references to this agenda are limited in the international development strategy, we hope it will be picked up and addressed more fully in the forthcoming human rights strategy.
- **There is greater focus on promoting British (economic) interests:** From the outset, the strategy promises to "deliver for people here in the UK – investments abroad will generate export opportunities in the UK, creating jobs right across the country" (p.8). It is worrying that there is more focus on British expertise and capital than on understanding the needs of low- and middle-income countries and their expectations of the UK as a responsible global player. There is no mention of policies like easier technology transfer to help deal with climate change, a waiver to ensure equitable access to Covid-19 vaccines, fixing international tax avoidance loopholes or reforming the global economic and financial system so it works for all countries and not just a few. Selecting partners for development assistance on the basis of favourable trading relationships for the UK fundamentally neglects what should be the primary purpose of the strategy.
- **The UK will shift from multilateral to bilateral funding:** Presented as one of the main changes in the strategy is a reduction in assistance to multilaterals. The UK will allocate 75% of its ODA through country and bilateral programmes by 2025. Prior to the UK aid cuts, the UK spent around 68% of ODA bilaterally, so this may not be as significant a shift as heralded. However, the 75% bilateral target could pose an unnecessary hurdle to the most efficient use of UK ODA as well as scaling back up to an ODA budget based on 0.7% Gross National Income (GNI). Multilateral funding offers a proven and effective way to pool resources and act collectively to alleviate poverty at scale, while bilateral spending can increase country ownership and provide greater flexibility. Placing arbitrary limits on either could ultimately be counter-productive.
- **Tilt to Indo-Pacific and Europe but sustained presence in Africa:** The strategy reflects the rebalancing towards the Indo-Pacific set out the Integrated Review and there is also a renewed focus on Europe following the conflict in Ukraine. Both these decisions are consistent with the focus on geopolitics rather than poverty-reduction that we see throughout the strategy. Spending commitments to Africa are sustained – but as a percentage, rather than in terms of value, so this will mean a reduction in the overall amount of ODA going to the continent. Within Africa, South Africa, Nigeria, Ethiopia, Kenya and Ghana (most of which are classified by the World Bank as lower- or upper-middle-income countries) will be prioritised as strategic partners. Investments in fragile states – which are often among those with the highest rates of people living in extreme poverty according to the World Bank – will be more targeted.

- **A change in language:** The strategy is written in very different language, with an emphasis on "freedom", "self-determination", "resilience" and "potential", all of which represent core themes running throughout the paper and signal a broader shift in the UKs approach to development. In the foreword, the foreign secretary states that "our strategy is about unleashing the power of people and countries to take control of their own future" and ensuring that "our international development work furthers UK ideals, standing up for freedom around the world and supporting countries to plan for their own sustained, long-term progress and resilience" (p4). Much of the language used is ambiguous and will mean different things to different people. More precision and detail will be required when it comes to the implementation of the strategy.

The priorities

The strategy is based around four main priorities: "honest and reliable investment", "women and girls", "humanitarian assistance", and "climate, nature and global health". For the purposes of this paper, we have split the fourth priority into two: climate and nature, then global health.

"Honest and reliable investment"

The strategy's first priority is to put "capital markets, investment and growth expertise, independent trade policies" at the centre of development approach and "deliver honest, responsible investment, in particular for cleaner and more reliable infrastructure" (p.8). British International Partnerships (BIPs) including the Clean Green Initiative, British International Investment (BII), British Support for Infrastructure Projects (BSIP), Mobilising Institutional Capital Through Listed Product Structures (MOBILIST) programme, and Private Infrastructure Development Group (PIDG) plus UK guarantees and UK Export Finance, will offer new finance – mostly in the form of loans helping countries to "pursue resilient and sustainable economic growth" (p.9).

The strategy suggests that the UK will now seek to go beyond trade in goods in these agreements to include services – something that most low- and middle-income countries have resisted until now. Also, it fails to mention some critical areas where trade and economic investment really could bring genuine benefits. There are few reflections on trade and climate and the critical changes that must be made to the trade system to meet the Paris Agreement. There is no mention of policies like easier technology transfer to help with smooth transition to green, sustainable economies.

We need huge investment to achieve SDGs and build decarbonised economies, but high volumes of FDI do not necessarily guarantee sustainable development and direct improvements for the world's most marginalised people. FDI can undermine sustainable development and increase inequality.

Trade has an important role to play in development, but it must be the right kind of trade. The strategy presents free trade as a path to prosperity and to lift people out of poverty. While trade may increase economic growth and gross domestic product (GDP), it does not necessarily trickle down to the world's most marginalised people. Alignment with SDGs, Paris Agreement, "leave no one behind", and better integration of business and human rights would be required to make it work for marginalised people, but assurances on this are missing from the strategy.

If the strategy is to use trade and investment as a tool to boost genuine development, it should guarantee and incentivise transfer of labour skills, technology and management practices, the fostering

of innovation, training local workers and entrepreneurs, and sourcing inputs locally. Without such conditions, foreign investment will fail to adequately build national linkages, generate decent employment, or increase wages. Too often, free trade agreements and bilateral investment treaties limit or prohibit the very policies low- and middle-income countries need to fight poverty and inequality, and build a just and sustainable world, while at the same time expanding the rights of investors. To support the flourishing of local economies, decision-making on investment and resource ownership should be made as close to the relevant communities as possible.

Recommendation for next steps

The government should design a specific international trade and investment strategy which would recognise the special and differential treatment that low- and middle-income countries require to move up the development ladder, enabling them to adopt flexible intellectual property legislation, exclude essential public services from liberalisation or privatisation commitments, and respect the rights of governments to legislate in the public interest, including protection of environment, human rights and the livelihoods of communities. Moreover, it should commit to full alignment with SDGs, The Paris Agreement, "leave no one behind", and put the local farmers, producers and workers rather than international investors and shareholders at the centre of the strategy.

"Women and girls"

The strategy's second priority is to "provide women and girls with the freedom they need to succeed" (p11). It defines long-term success as "every girl receiving 12 years of quality education, all women and girls empowered to have voice, choice and control over their lives, free from the threat of violence, and a significant reduction in the Global Gender Gap" (p11). It states that the government will restore funding to this area, and the foreign secretary explained to the International Development Committee on 18 May 2022 that this will be £745 million, although the exact figure is disputed. Clarity is urgently required on when and how this funding will be restored.

This support will be focused on the "Three Es": educating girls, empowering women and ending violence against women and girls. The "empowerment" priority covers a broad range of issues including sexual and reproductive health and rights, political participation, and women's economic empowerment. These are all vital to the achievement of gender equality more broadly and must not be lost under the 3Es formula. A holistic approach will be needed which addresses the multiple and often interconnected structural barriers preventing gender equality.

While the strategy is framed in terms of the freedom of women and girls, in practice this must mean the attainment of gender equality, and the rights of women and girls in all their diversity, recognising that the problem lies not with individuals' capacities but in structural barriers across society.

A key concern is that the strategy's stated rationale for supporting women and girls is to "accelerate progress on all our global priorities, from economic prosperity to security". Gender equality should be an end in itself and assurance is needed that the rights of women and girls are prioritised as the UK promotes private investment abroad and establishes new economic and security partnerships. The government must redress the negative impacts that current trade and economic policies have on women and girls, taking a gender-just approach to trade and investment, including by promoting decent work, access to quality, free gender responsive public services, protecting community land rights, and ensuring robust mechanisms for holding UK businesses to account for rights violations linked to their supply chains and activities.

Recommendation for next steps

The governments forthcoming Women and Girls strategy should take a comprehensive and evidence-based approach towards promoting gender equality for women and girls in all their diversity and include long-term, fully resourced interventions that address the multiple and interconnected barriers to gender equality with adequate priority given to women's economic justice, women's political leadership and sexual and reproductive health and rights, and support for women and girls' rights organisations. It must also ensure policy coherence, recognising the limits of private investment in promoting gender equality goals and promoting feminist alternatives within Covid-19 economic recovery plans.

"Humanitarian assistance"

The strategy's third pillar sets out a clear commitment to humanitarian response and to the UK continuing as a "global leader in driving more effective approaches to crises" (p18). It presents humanitarian response as an arena in which the UK will bring all its various tools – funding, expertise, diplomatic capabilities, innovative finance and insurance mechanisms as well as science and technology – to strengthen the resilience of countries. The "prioritise, protect and prevent" framework at the heart, coupled with a renewed commitment to principled humanitarian action, has the potential to provide a strong basis for robust humanitarian response.

This pillar includes the strategy's strongest commitment to needs-based prioritisation. Moreover, it recognises the centrality of prevention and anticipatory action to humanitarian response and includes commitments to tackling the underlying causes of crises as well as breaking the cycles of violence and conflict.

The strategy commits to spend £3 billion on humanitarian action over the next three years. At roughly £1 billion per year, this amounts to a significant reduction in resources at a time when humanitarian needs are growing. In the last year alone, new crises in Afghanistan and Ukraine have required significant, unanticipated funding while crises in Yemen, Syria and Ethiopia, to name a few, continue. There is no guarantee that 50% of UK ODA will be spent in fragile and conflict-affected states as there was previously.

It is welcome that the strategy contains key criteria for humanitarian action: it will be needs-based, principled, and focused on protection and prevention. It references international human rights law, international refugee law as well as international humanitarian law. However, there are some gaps. It contains no mention of "do no harm" or safeguards to ensure that development assistance and trade agreements promote peace rather than undermine it. The commitment to principled humanitarian action sits uneasily with the strategy's wider geopolitical logic or commitment to UK national self-interest. Later, the strategy (p.45) is clear that investments in Africa will be targeted in "fragile states or where there are compelling trade and investment opportunities" without reference to how those distinct logics might be resolved.

Moreover, there is almost nothing about implementation. There are no targets or indicators against which we will be able to judge action. The strategy contains very little detail on how the increasingly scarce resources will be allocated, or indeed how humanitarian needs will be balanced against the strategy's other pillars.

Recommendation for next steps

The FCDO should operationalise the use of the wider tools of government (sanctions, diplomacy, peacekeeping) alongside funding in complementary ways to address the root causes of humanitarian crises, with the specific intention to ensure these "do no harm" and do not undermine humanitarian objectives.

"Climate and nature"

The fourth priority of the strategy focuses in part on climate change and nature. It states that this is the UK's number one international priority yet is fourth in their list of priorities. The strategy repeats the UK's existing commitments, including to allocate £11.6bn over five years for climate finance and aligning all ODA with the Paris Agreement and the Global Biodiversity Framework once it's agreed. It also says that the UK will continue its leadership from Cop26.

While these commitments are welcome reflections of the UK's headline international commitments on climate change and nature, the overall framing and the notable absences raise concerns about the government's broader philosophy on international climate and nature action and its coherent integration across all investments and decisions.

The strategy is a repetition of previous statements, with no new commitments or signals of a desire to push further, or clarity on how the climate finance commitment made under 0.7% ODA will be achieved following the cuts. While the document reiterates the importance of climate action, it makes no mention of climate justice, the UK's historic responsibility, or the realities of the impacts of climate change for marginalised communities. The existing commitment to allocate 50% of climate finance for adaptation is included, but there is little mention of adaptation and the locally led action needed, and no mention at all of loss and damage. Overall, the entire treatment of climate change and nature loss is not people-centred, as it should be.

Instead, emphasis is placed on private capital, economic growth and technology (through the Clean Green Initiative) and infrastructure. BII is highlighted as a vehicle for mobilising private finance for climate. As a limited company, the government has very little say over how BII spends its money. The emphasis on BII throughout the document increases the urgent need to close the loophole which currently allows them to continue investing in gas, despite the government-wide commitment to end international fossil fuel investment.

Recommendation for next steps

The UK government should fully recognise and reflect the IPCC's 2022 report on Impacts, Vulnerability, and Adaptation, including a specific commitment to the locally led adaptation principles previously endorsed by FCDO, and make new commitments to address loss and damage from climate change impacts. Urgently close the loophole which allows the BII to continue investing in gas despite the government's commitment to ending all international investment in fossil fuels.

"Global health"

Global health makes up the other part of priority four, alongside climate change and nature. There is little recognition of the intersections between global health and climate change, or the connections between health and the other stated priorities.

The global health priority is framed within the context of the Covid-19 pandemic, recent G7 and Cop26 commitments, and the prime minister's focus on pandemic preparedness. While we welcome the statement that "strengthening health systems is at the core of our [the UK's] long-term approach", the outcome of this work is focused on improving global health security rather than improving people's health and wellbeing. It is also disappointing to see that the UK's commitments to Universal Health Coverage, SDG3 and the right to health are not referenced.

There are five sub-priorities for the UK's work on global health, including welcome emphasis on continuing to support the work of multilaterals including the World Health Organization, The Global Fund, Gavi and the Vaccine Alliance, as well as promoting a One Health approach and delivering on the "Ending Preventable Deaths of Mothers, Newborn and Children" position paper. Throughout the full strategy, there is an emphasis on health research and innovation, which has been an important historic strategic priority for the UK. However, there is very little detail on implementation and how the UK will deliver its commitments to health systems strengthening.

Recommendation for next steps

The UK government should publish a coherent and strategically funded global health plan that covers all aspects of global health in order to align with its aims on health systems strengthening, universal health coverage and ending preventable deaths.

Beyond the priorities

Beyond the four main priorities, there are references to other areas of importance to civil society, such as conflict and peacebuilding, open societies, the SDGs and "leave no one behind". We also look at how the strategy touches on two emerging priorities for the UK development sector: locally led development and decolonisation and anti-racism.

Conflict and peacebuilding

We know that conflict and fragility are among the biggest barriers to achieving the SDGs globally, so it is disappointing that tackling conflict and building peace are not listed as priorities in their own right. References to conflict and peacebuilding appear throughout the strategy. The focus is on prevention and the need to tackle the root causes of instability, conflict and human suffering - as well as on helping countries to escape the cycles of violence that sustain many ongoing crises, which is important and welcome.

However, the conflict prevention and reduction methods discussed appear to be more focused on top-down solutions (diplomacy, sanctions, peacekeeping, political settlements) rather than more locally led approaches – despite there being commitments elsewhere in the paper to ensure that those who benefit from development programming "must have a voice in what we do and how we do it" and that policies should be "locally owned" (p29).

It makes connections between conflict and other "shared security challenges" (p26) such as serious and organised crime, corruption and armed groups. While this undoubtedly relates to a perceived need to justify interventions as being in the interests of the UK, it should also be in the interest of people experiencing conflict and violence who suffer disproportionately.

Elsewhere, the paper:

- Confirms the UK will establish a conflict and atrocity prevention hub, which will come under the new Director-General for Development and Humanitarian. At the International Development Committee (IDC) hearing on 18 May 2022, the current DG Nick Dyer said that the Office for Conflict, Stabilisation and Mediation (OCSM) would also be maintained.
- Reinforces the existing trend of fewer resources going to fragile and conflict-affected states (FCAS), where the target had once been to spend 50% of all ODA in FCAS. Instead, investments will be targeted "to address the drivers and causes of conflict" (p30).
- States that the UK will "lead globally on women, peace and security" (p12).

Commits to "ensure that all our work takes account of its impact on the causes and effects of conflict" (p30), which is welcome as investments that form the central pillar of this strategy must be conflict-sensitive. We hope that some of the changes to delivery – such as the recognition we should adopt a "patient approach which helps our partners tackle the structural problems they face" (p6), and more responsive and flexible support with greater responsibilities for ambassadors and high commissioners – could also be good for conflict programming. This is because conflict dynamics are complicated and can spread quickly, so you need programming that is more adaptable, locally owned and tolerates a higher level of risk.

Recommendation for next steps

The FCDO should use the forthcoming Strategic Conflict Framework to provide more detail on work to prevent and resolve conflicts through tackling the root causes (including injustice, exclusion and poor governance) and join up the dots on conflict, gender, local ownership and reducing bureaucracy.

Open societies

Open societies are essential for development, and it is the most marginalised (e.g. women and girls, religious and ethnic minorities, indigenous communities, LGBTQI+ people, people with disabilities, refugees and migrants) who often suffer most from autocratic behaviours and attacks on rights and freedoms. The desire to confront rising authoritarianism sits at the heart of this strategy, and references to freedom are peppered throughout, yet the vision of open societies it presents is a narrow one with no mention of human rights or civic space.

In the Integrated Review, the 2021 G7 Open Societies Statement and the 2022 G7 Resilient Democracies Statement, the UK made commitments to support open societies, defend human rights, protect civic space globally and work in partnership with civil society organisations and human rights defenders. However, as they were omitted from this strategy, it is unclear how these commitments will be taken forward as part of the UK's development policies and programming. While it may be that more detail on the implementation of these commitments is provided in the forthcoming human rights strategy, the failure to recognise the necessity of human rights and civic space for development is disappointing.

Instead, the strategy focuses on securing economic freedoms through using development assistance to leverage investment and boosting resilience to authoritarian influence and interference through security partnerships. In Africa, the strategy states that the UK will "articulate the benefits of freedom and openness for governments and their people – to achieve lasting growth, stability, poverty reduction, and reduced humanitarian need, in the face of growing challenges from authoritarian influence, zero-sum politics and disinformation" (p25). In the Indo-Pacific, the UK will use its "ODA spend, expertise, trade

and investment ...to build strong economic results... [while] promoting a positive vision of progress through free enterprise, accountable institutions, and free and open societies" (p25). While the commitment to promote free and open societies is welcome, the protection of fundamental rights - including the rights to freedom of expression, assembly, association, information and to participation, have much wider benefits for people and societies and should be priorities in themselves.

The strategy also states that development progress depends on effective institutions, including a free press, and that "open and accountable institutions ensure systems work for everybody" (p21). It endorses a patient approach, which "unlocks the power of people, ideas and institutions" (p21) and emphasises the importance of accountability, transparency and rule of law. This is welcome but given the urgency of the situation in many countries, more details are required as to whether and how this approach will protect the rights of marginalised groups and the civil society organisations and activists who work alongside them in the short and medium term.

Recommendation for next steps

The FCDO should use the forthcoming human rights strategy to detail how the UK will work in partnership with civil society and human rights defenders to protect human rights and civic space globally and in priority countries and regions, especially in relation to marginalised groups, in the short, medium and long term.

Sustainable Development Goals

It is welcome to see the government commit to the SDGs and acknowledge the interconnectedness of poverty, climate change and conflict. It is also very welcome to see the strategy commit all ODA spending departments to report annually on progress to achieve the SDGs, and we are glad to see that there will be a refresh of the cross-government means of implementation of ODA. However, there is a lack of clarity on how or when these commitments will be implemented, and sectoral participation in implementing them will be critical.

There are also other significant gaps in the strategy. Beyond the headline commitment to the SDGs there is very little information about how they inform decision-making. The principles of the 2030 Agenda are not addressed: there is no clear commitment to "leave no one behind", which had been a central pillar of UK international development policy for many years. There is also an overemphasis on the economic pillar of sustainable development, without the acknowledgement of the indivisibility of the 2030 Agenda, and there is little on policy coherence - especially in the shift from multilateral to bilateral UK aid.

It would be good to see an analysis of the impact of the strategy on SDG implementation by focusing on the concept of policy coherence and systematically mapping the way in which particular policies are contributing to individual goals and targets. There is also a need to recognise the universality of the SDGs and go further to understand how the FCDO's work aligns with other departments' Outcome Delivery Plans (ODPs).

Finally, participation is a central element to the 2030 Agenda, and developing a genuine and meaningful participatory and locally led approach to development is needed. The government should clearly articulate how it will support SDG implementation in other countries, including how the UK will support governments to develop and implement SDG plans and budgeting and support other stakeholders, including civil society, to hold governments to account.

Recommendation for next steps

The FCDO should take immediate action to assess and present national progress made in implementing the 2030 Agenda via the UK's 2019 Voluntary National Review (VNR) commitments; establish an inclusive, multi-stakeholder engagement mechanism on SDG implementation to help take forwards the commitments made in the strategy for international development; and demonstrate the impact of UK aid on achieving the SDGs by using the Organisation for Economic Co-operation and Development (OECD) Development Assistance Committee Creditor Reporting System's SDG marker to track all ODA-funded programmes against SDG targets.

"Leave no one behind"

It is highly concerning that the strategy fails to draw an explicit link between ODA, tackling inequality and reaching the furthest behind first. The strategy was an opportunity to signal a strong ongoing commitment to addressing discrimination and exclusion in all FCDO's work, and to bring the many inclusion strategies that exist together into a coherent articulation about what this promise means for the FCDO in a way that is practical for decision-making.

The assumption underpinning the strategy is that strong economic growth in low- and middle-income countries will solve poverty and inequality. However, economic development over the past 30 years has in fact increased inequality and pushed many groups further behind – a trend which has been exacerbated by the COVID-19 pandemic. The strategy relies heavily on trade and investments as policy levers rather than, for example, long-term integrated poverty reduction strategies such as social protection and other safety nets. This re-focus on a trickle-down approach poses serious questions for how the FCDO will continue to prioritise people who have been marginalised and excluded, which is crucial to meet the promise to "leave no one behind" and deliver the SDGs.

It is also highly concerning that the UK's commitment to data disaggregation efforts – which the UK has a strong track record on – has been omitted from the strategy. Data disaggregation is critical to enable all actors to understand impact and allocate resources equitably.

Recommendation for next steps

The government should clearly outline how they will deliver on the "leave no one behind" promise in a way that is practical for decision-making, and urgently publish an updated Inclusive Data Charter action plan that mobilises political commitments and meaningful actions to advance inclusive and disaggregated data.

Locally led development

The strategy commits the UK government to becoming "locally owned" as "those who benefit from our work must have a voice in what we do, and how we do it". We welcome the language as it is inclusive and recognises the importance of local communities and local civil society. The decision by the government to decentralise and shift decision-making to ambassadors and high commissioners is an important step to supporting a shift in power to lower- and middle-income countries. If the UK wants to become a truly locally led funder, then it will need to fundamentally change how it operates in development and humanitarian contexts.

There is little detail in the strategy on how the government plans to implement this ambitious policy as it will have wide reaching impact across the department, from due diligence, risk, procurement, and

monitoring and evaluation, to even the fee rates that they pay consultants. The government does not need to start from the beginning. It should learn from the examples of good practice that are already taking place across the FCDO such as the work that they have done with the Start Network in Bangladesh on tiered due diligence and recent updates to Rapid Response Fund (RRF) funding guidelines which request and encourage locally led ways of working, as well as from other funders that are already doing it well.

There are potential contradictions in the narrative around locally led development and reducing bureaucracy. The decision to work with just 12 NGO partners on the due diligence is at odds with the government's commitment to becoming more locally owned. It is important that the partners that are selected to work with the government on due diligence are representative of local organisations so that their perspectives are included. It is also important that any changes to due diligence process include specific focus on reducing bureaucracy for local partners.

Recommendation for next steps

The UK government should work with civil society organisations to develop a strategy on how they plan to become a locally led funder. This should include a definition on what they mean by "locally led" and initial targets for funding that should go directly to local actors.

Decolonisation and anti-racism

Unfortunately, the strategy falls short of the active conversations taking place in the sector on decolonisation, racial equity and progressing racial justice in all our work.

The strategy was an important opportunity for the UK to acknowledge the colonial roots of modern poverty, global inequality, international development, climate change, biodiversity loss. It also sets out a vision that redresses enduring power imbalances and systemic inequalities and reimagines international development.

It is good to see references throughout the strategy to the need to tackle "structural problems" that undermine development, but a lack of detail on what this means could be read in different ways by those with different worldviews. It is also deafeningly silent on the UK's role in developing many of the structural problems that lead to communities being marginalised and to unequal power relations. For example, there is no acknowledgement of the fact that Economic Partnership Agreements (EPAs) with lower- and middle-income countries, which the strategy suggests will be a major focus, have been highly controversial [PDF] or that the UK had to strong-arm countries into signing them. The UK has rolled over EPAs despite requests from partner countries for time to revise the deals and without addressing serious concerns about the impact on important development goals.

Although there are many references to "supporting" and "partnering" with communities, the strategy leaves a lot unsaid in terms of how this will happen in practice. There is a welcome focus on agency and self-determination – for example, the strategy states that the UK will, through its development work, support "countries to plan for their own, sustained long-term progress and resilience" (p4), but again there is a lack of detail on what this means and how this will be achieved, including the roles of NGOs, government and other donors.

The strategy also says nothing about the need to collectively work on racial equity and progress racial justice, which is fundamental to creating a more equitable and fairer sector and development system. A recent report from the IDC, Racism in the Aid Sector, highlights the serious nature and scale of the problem and the extent of work that needs to be done to welcome diverse ideas and values into the

sector – as well as challenge the colonial mentalities and fundamental power imbalances within the sector that allow racism to persist. The report recommends that the FCDO facilitate sector-wide initiatives on improving diversity, equity and inclusion as well as undertake a full audit of pay structures in its own UK aid contracts.

To deliver the strategy effectively, the FCDO must become more inclusive and diverse – including in its engagement with civil society and academia. For example, the government should encourage ambassadors and high commissioners to adopt an approach to engagement which values locally produced knowledge, expertise and lived experience and is rooted in equitable representation in decision-making spaces.

Recommendation for next steps

FCDO should work with civil society to implement the findings of the IDC report, Racism in the Aid Sector, in full.

Delivering the priorities

After setting out the four main priorities, the strategy for international development focuses on the delivery of these priorities. It contains sections on the allocation of ODA, the decision to shift from multilaterals to bilateral country programming, and the desire to "reduce bureaucracy". It also touches on priorities for the sector, including operations in high risk environments, transparency, and funding for civil society.

Official Development Assistance

On ODA, the strategy is confused. Throughout most of the document, ODA is barely mentioned, with far more emphasis on investment (which presumably will be partly ODA-funded), diplomacy and other levers. A whole of government approach is important, but ODA must play a central role in this. Poverty reduction is lacking as a guiding principle for ODA spending and instead there is a focus on ODA to leverage other finance. This risks missing opportunities where ODA funding is most effective and best placed to support the wider objectives of the strategy. The emphasis on trade and investment and the reduction of spending on other priorities to a series of specific interventions (rather than systematically addressing the drivers of health or gender inequality) do not point to ODA being used where it is most effective.

The final section of the strategy focuses specifically on ODA and contains positive statements, including that the majority of UK aid will go to low-income countries. The government promises to "continue to support the global goal of providing at least 0.2% of our gross national income (GNI) to the Least Developed Countries" (p30). The stated desire to ensure ODA delivers "benefits for real people" is also welcome, pointing to a recognition of inequality and the intention to target those most in poverty within partner countries. Taken within the broader context of the whole strategy, it is unclear how these commitments align with the tilt to the Indo-Pacific, the priorities of the Integrated Review and the strategic priorities of trade and investment.

The strategy does not provide a timeline or plan for returning to 0.7%. This is a serious gap which could lead to inefficient ODA spending should the UK have to rapidly scale up its budget in a short timeframe.

The decision to reduce multilateral spending to 25% of the ODA budget makes it even more difficult to rapidly and effectively scale up. Multilaterals provide a proven and effective way to spend large amounts of ODA at scale, targeting people living in poverty. While we understand the desire to increase country ownership and support an increase of funding through bilateral channels, putting a hard ceiling on multilateral spending reduces the options available to the government at a time when growing global needs means it is even more critical that limited ODA funds be spent in the most effective and efficient way possible. Instead, the government should continue to invest in those with a proven track record and use their position to further improve these institutions, while also increasing funding through bilateral channels in preparation for a return to 0.7%.

Recommendations for next steps

The UK government must address the tensions between the different priorities for ODA contained within the strategy, and create a clear mandate for ODA to prioritise the activities and countries where it is best placed to support poverty alleviation.

Shift away from multilateralism

Multilateralism is essential for global progress on development, peace and democracy. While we all know that working through multilateral spaces requires patience and compromise, it is the only way to address global challenges including indebtedness, economic development, poverty, inequality, climate change and biodiversity loss. Working with allies outside of multilateral spaces risks creating divisions and slowing progress.

Instead of moving away from multilateralism, the UK must demonstrate its full support and commitment to reform multilateral institutions so they work in a more effective and inclusive manner. For example, the UK should use its diplomatic influence to support the reinvention of the World Trade Organization as a multilateral forum focused on aligning trade rules to other international standards – especially the SDGs and the Paris Agreement – and addressing longstanding concerns of lower middle-income countries (LMICs), particularly regarding food and agricultural trade policies.

Some of the shift to bilateral assistance can be explained simply as a result of contributions to the EU development funding pot being decreased due to Brexit. However, the UK's decision to not transfer previously EU earmarked money to other multilateral instruments is a calculated choice to be "more consciously geopolitical" (p 6) and to increase the UK's control over ODA spending. This could undermine the unique role multilateral instruments play in addressing more systemic development issues and reducing their capacity they to deliver on their objectives. It also increases the likelihood that humanitarian and development assistance will go to those who are strategically critical in achieving the UK's geopolitical or commercial objectives, rather than those who need it most.

Recommendation for next steps

The FCDO should commission and publish an independent impact assessment of multilateral organisations in terms of current or potential capacity to deliver on the SDGs, the Paris Agreement and "leave no one behind" to inform future decisions on ODA spending.

"Reducing bureaucracy"

The government's commitment to reducing bureaucracy to increase innovation and help the UK work better with global partners and respond quickly is welcome. Streamlining grant agreements and

agreeing one single due diligence process are also positive moves, as is giving senior responsible owners (SROs) more power to "apply proportionality". It is a big step in reducing barriers for small and local organisations to access funding from the FCDO and could help the government achieve more direct funding to local organisations and communities. Questions remain about how the government will ensure standards and staffing levels remain high, and whether these changes will help local organisations access funding in practice.

As part of the drive to reduce bureaucracy, ambassadors and high commissioners will be given more authority to ensure quicker decision-making, that is relevant to the local and national context. We hope this will support decentralisation and a broader shift towards local ownership and locally led development. However, this must not be at the expense of transparency and accountability. It is important that standards are consistent, and that good practice and learning is shared across the diplomatic network.

Recommendation for next steps

The FCDO should update its procurement guidelines, including on whether some Accountable Grant Agreement (AGA) requirements limit INGOs' ability to work with local partners, clarifying parameters for flexibility and proportionality to ensure standards are upheld and money reaches the people who need it most in an easy and efficient way.

Operations in high-risk environments

Many development, humanitarian, human rights and peacebuilding programmes take place in high-risk environments: places that are often characterised by violent conflict and insecurity where state and non-state armed actors or groups operate. Organisations working in these contexts face multiple risks and there are a range of different risk-related frameworks that organisations must adhere to, including sanctions, anti-money laundering regulations, counter-terrorism and counter-terrorist financing rules, anti-corruption measures and humanitarian assistance diversion measures and safeguarding requirements.

Risk-related frameworks, along with a "zero tolerance" approach to risk by international bodies and national governments, have had negative consequences for international NGO and civil society organisation operations. The UK must ensure its terrorism sanctions and counter-terrorism, including counter-terrorism financing laws and policies, safeguard civic space and allow unimpeded humanitarian work. This needs to be in line with international human rights and humanitarian laws and peacebuilding and mediation efforts that address the causes of violence and prevent future conflict.

The commitment in the strategy to "ensure national security efforts do not hinder humanitarian action, as we did with other UNSC [United Nations Security Council] members in protecting humanitarian assistance in Afghanistan from sanctions" (p16) is therefore welcome. However, carve-outs and safeguards such as the Afghanistan exception should also cover peacebuilding work as well as humanitarian assistance, and we should consider extending them to development and rights work too.

The UK government must also be open to jointly identifying and managing risks with civil society and NGO partners and continue to pursue other potential legal, operational and policy solutions in consultation with civil society.

Recommendation for next steps

The government should ensure sanctions, counter-terrorism and counter-terrorism financing laws and policies that protect civic space and allow unimpeded humanitarian work in line with international human rights and humanitarian laws. They should also support peacebuilding and mediation efforts that address the causes of violence and prevent future conflict by building necessary safeguards into sanctions regimes as they are developed, working with civil society to pursue other potential legal, operational and policy solutions.

Transparency

The strategy only makes a passing reference to high standards of transparency for financing models and the importance of transparency and accountability in bilateral partners' institutions.

It includes nothing on how the UK government will improve its own transparency or meet international transparency standards. While it was good to see that all ODA spending departments will remain accountable for their ODA expenditure and continue to publish information in their annual reports, transparency is necessary at all stages of an investment process: commitment, budgeting, spending and reporting to ensure accountability.

Unlike in previous years, there was no commitment for all ODA spending departments to achieve a "good" or "very good" rating in the international Aid Transparency Index (ATI) or mention of independent scrutiny of ODA spending. However, it is welcome that the foreign secretary confirmed in her evidence to the IDC that the Independent Commission for Aid Impact (ICAI) will continue to scrutinise the UK aid budget.

It remains unclear if the government is committed to the 2018 transparency agenda, Open aid, open societies: a vision for a transparent world, or intends to develop a new strategy on this. A large question remains about the implications of reducing bureaucracy for transparency and accountability. As ambassadors and high commissioners gain more authority to make decisions, it will be imperative that information on ODA decision-making, budgets and spending be comparable, consistent, comprehensive, accurate, timely and accessible.

Recommendation for next steps

The UK government should commit to all ODA spending departments achieving "good" or "very good" in the ATI. They should also commit to publishing both departmental budgets and a cross-government ODA budget plan annually.

Funding for civil society

Apart from the announcement that the UK would reduce humanitarian funding to £3bn over the next three years, there was very little detail on grant funding in the strategy. We would have expected to see more details on the funding available to civil society and the FCDO's centrally managed funds, such as UK Aid Direct and UK Aid Match.

We would have also liked to see more details on *how* the UK government funds civil society, including a commitment to transparency in their discussions so that CSOs can contribute to the direction of travel. We had hoped to see funding that supported equitable transformational partnerships with local

civil society, and in particular a commitment to give long-term flexible core funding, as this gives CSOs the power to make decisions themselves.

Recommendation for next steps

The UK government should commit to giving long-term, flexible, and direct funding to civil society partners, including a ringfenced percentage for local civil society organisations.

Conclusion

The publication of the UK government's strategy for international development should bring some much-needed direction and stability after a tumultuous few years, triggered by the Covid-19 pandemic and the decision to merge the Foreign and Commonwealth Office with the Department for International Development, complicated by significant cuts to ODA compounded by the foreign policy and humanitarian crises in Afghanistan and Ukraine.

There are many positives in the strategy, including the focus on gender equality, humanitarian action and conflict prevention. We welcome the emphasis on tackling structural problems and the root causes of crises, as well as the recognition that development is a process that requires patience to bring about long-term, sustainable change. The emphasis on the "power of people", "self-determination" and "agency" is also welcome. Along with the commitment to partner with civil society and ensure that "those who benefit from our work must have a voice in what we do, and how we do it," it paves the way for the UK's approach to development to become more locally led.

However, these positives are counterbalanced by serious concerns about the shift away from poverty reduction, the SDGs and "leaving no one behind" as the primary focus and framework for the UK's humanitarian and development assistance. With this strategy, the UK government has fundamentally repositioned humanitarian and development assistance as an instrument of foreign and security policy in the context of the war in Ukraine and the rising influence of China. While these foreign policy challenges are important and urgent, we believe the UK government can respond to them while also meeting its longstanding commitments to reduce poverty and put the furthest behind first.

Finally, good policies are only effective if they are fully resourced. There are few financial commitments in the strategy, and the next three-year budget for the FCDO has not yet been published. This makes it difficult to examine whether there are real shifts in policy if commitments are not backed up with sufficient money. Departmental budgets must be published in full. We also need clear goals, targets and indicators to guide and measure progress towards the priorities set out in this strategy. We look forward to seeing more detail on how the UK will deliver its plans in forthcoming strategies, including those on women and girls, human rights, conflict and stability, and global health.

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