



SDG 16: Progress, gaps and recommendations for the UK

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The realisation of SDG 16 can be a positive catalyst for the achievement of the other SDGs. However, the UK's leadership role in the areas of SDG 16 continues to diminish, as warned in Bond's 2019 report. There is a lack of policy coherence across all the SDG 16 areas, a lack of alignment of policy with practice, and a lack of sustained focus over the medium to long term. These three shortcomings could partially be addressed were the UK government to consistently play its part in the implementation of the SDGs and use the SDGs as a reference point in its foreign and development policy.

SDG 16 is of vital importance to LGBTQ+ and gender non-conforming people who often face barriers to accessing justice, with crimes against them underreported in most parts of the world. These communities face high rates of ill-treatment, arbitrary arrests and extortion and are often subjected to violence in detention facilities. There is a general pattern of impunity, whereby government and law enforcement officials and public institutions are often unresponsive to their claims of violence and discrimination. There is an urgent need to repeal laws that criminalise same-sex sexual acts, gender identity or expression, and measures are needed to ensure access to justice. A key issue for achieving justice for LGBTQ+ and gender non-conforming people is to be counted in order to build an evidence-base. Civil society has needed to build its own data collection systems, through reporting platforms and mobile phone apps, to document the victims/survivors and perpetrators of rights violations and to use this evidence to tackle barriers to justice and build stronger institutions.



Target 16.1:

Significantly reduce all forms of violence and related death rates everywhere.

The decision to cut official development assistance (ODA) is hampering the FCDO's positive role in promoting peace and preventing conflict, and is undermining UK policy coherence. The cuts, which reduced the total ODA budget by £4.5 billion, resulted in various programme closures in 2021, and included cuts to lifesaving health and humanitarian assistance.³¹³ The FCDO faces a spiral of rapidly diminishing returns if it is drawn or forced into reducing investment in addressing the root causes of violent conflict globally. This reduction is partially the result of directing unprecedented resources towards selected emergencies, such as the Ukraine conflict, in the context of a reduced overall budget.

Evidence shows that promoting good governance and social cohesion, rigorous arms control, and linking conflict-prevention to climate, food and health security all offer good return on investment, in terms of conflict reduction and other outcomes. The UK government has yet to articulate a comprehensive view of conflict, relative to other drivers of marginalisation, which is urgently needed³¹⁴, and successive strategy documents all present different emphases without clear guidance to officials regarding implementation. The forthcoming Strategic Conflict Framework is a chance to rectify this, yet there is uncertainty around the document's status, given the personal pronouncements of the

313. Bond (15 March, 2022), ['The Impact of UK Aid Cuts on NGOs'](#); Devex (17 March, 2022), ['Tracking the UK's Controversial Aid Cuts'](#) [online articles, accessed June 2022]

314. Peace Direct, Alliance for Peacebuilding (2019), [Local Peacebuilding: What works and Why?](#)



Foreign Secretary.³¹⁵ Certain key, evidence-based principles need to be reasserted. Firstly, in fragile and conflict-affected contexts, achieving sustainable and effective results at scale in relation to SDG 16 requires integrated, systematic programming approaches programming across the humanitarian-development-peace 'triple nexus'. This means linking short-term emergency response programmes to longer-term social change processes in development.

Secondly, conflict sensitivity in programming requires robust contextual analysis and flexibility to allow for real-time adaptation. To be effectively implemented, FCDO-funded programmes and projects in fragile and conflict-affected settings require long-term, strategic planning and a thorough application of context analysis. Humanitarian programmes tend to have shorter timeframes and fewer resources for deep analysis of conflict dynamics, and HM Treasury regulations on underspend are ill-suited to adapting to the surprises and delays that are part and parcel of programming in fragile and conflict-affected contexts.

Thirdly, while the UK government continues to disburse much of its ODA through large-scale grants and contracts, and increasingly to multilateral instruments such as the UN and World Bank, working with highly effective and well-established local actors brings significant contextual knowledge of what works. Local actors can have a more advanced network, an ability to better understand the context, can enjoy greater levels of trust and buy-in from local communities and other stakeholders (when properly included), and can address root causes with greater cost effectiveness. Conversely, political settlements that are not supported by wider society are less likely to withstand the test of time.

Moreover, non-state actors and groups that have been marginalised can play a significant and positive role in peacebuilding processes.³¹⁶ Learning from the UK-funded Conflict Sensitivity Resource Facility (CSRF) in South Sudan found that conflict sensitivity for the wider aid sector benefits from localisation.³¹⁷ The CSRF found locally-led responses were better networked and enjoyed higher levels of trust, which enhanced their sustainability. Local actors were also able to expand the reach of humanitarian programming by combining peacebuilding, development and humanitarian responses most appropriate to local needs, and could cover areas abandoned or avoided by risk-averse INGOs or during staff evacuations due to conflict or Covid-19.³¹⁸ Critically, localising SDG 16 by investing in subnational, local capacities for peace requires suitable financial arrangements that

315. FCDO UK Government (27 April, 2022), ['The return of geopolitics: Foreign Secretary's Mansion House speech at the Lord Mayor's 2022 Easter Banquet'](#) [online text, accessed June 2022]

316. Krause J, Krause W and Branford P (2018), ['Women's Participation in Peace Negotiations and the Durability of Peace'](#), International Interactions, 4(6); Hall, E. (2021), [Futures Undisrupted: Living Up to the UK's Commitments to Children](#); Saferworld (2021), [A people-centred approach to security and justice: Recommendations for policy and programming](#) [p.3]

317. Robinson A and CSRF (2021), [Localisation and Conflict Sensitivity: Lessons on Good Practice from South Sudan, Conflict Sensitivity Resource Facility](#)

318. Hume, L. and Mitchell, L. (2021), [Strengthening Locally Led Peacebuilding: From Policy to Action](#)

support risk sharing, promote innovation, and can be directly allocated to local actors. It also requires data on efforts to support local leadership, community organising and movement building to be captured and shared.

Lastly, the response to conflict needs to be systemic rather than piecemeal. For instance, compare the unprecedented scale of the UK's response in Ukraine with its response in the Horn of Africa, which is facing a severe, multidimensional crisis. The region is experiencing the worst droughts

Spotlight: The case of Yemen

Yemen remains a paradox. Just over 20 million people in Yemen – two out of every three – are reliant on aid to survive. More than 17 million do not have sufficient food to eat. Yemeni women and children bear the brunt of the war by making up 73% of internally displaced people. Since the start of the conflict, violence against women has increased by over 63% (according to the UN).

The UK is the penholder for Yemen at the UN Security Council, and is responsible for brokering Yemen peace negotiations. Yet the UK has sold billions of pounds worth of arms to the Saudi-led coalition, has closed down efforts at the UN Security Council to work for peace, and has failed to work with leading actors to ensure accountability for war crimes. Saudi-led coalition airstrikes caused more civilian harm in January 2022 than in the two previous years combined, making it the most violent month in the conflict in over five years.

The UK can become a credible broker for peace when it stops selling arms, which can only continue fuelling the conflict. The value of all arms export licences granted by the UK government to members of the Saudi-led coalition since March 2015 is estimated to be worth over £7 billion. Another £10 billion in arms under 'open' licences is thought to have been supplied. By comparison, the humanitarian assistance provided by the UK government is £770 million.

The UK's disregard for past violations of international humanitarian law was ruled by the Court of Appeal to be unlawful, while NGOs and the UN have found UK weapon parts amongst the debris at the sites of various international humanitarian law violations. But instead of suspending arms transfers, the UK government has declared these violations to be 'isolated', and has instigated a judicial review that will take three years, kicking the issue into the long grass. Rather than have its hand forced by litigation, the UK government should suspend arms transfers while there is a serious risk that UK-made arms could be used to commit severe human rights violations.



in 40 years, and over 21 million people are living in extreme hunger, something that is being compounded by a dependence on Russian and Ukrainian wheat. Although the UK has been a leading humanitarian and development donor in the region, its role is now in decline due to cuts in ODA and reductions in staffing following the FCDO merger.³¹⁹ Yet others have not stepped up to fill this gap. Successive humanitarian appeals in East Africa have been underfunded, with commitments in 2022 so far covering only 3% of needs³²⁰. Neglect of nascent emergencies such as this will feed existing conflicts, and catalyse future ones, which will be yet more costly to resolve. This will undermine progress on all the other SDGs, as conflict prevents investment in infrastructure, services and governance.

Target 16.2:

End abuse, exploitation, trafficking and all forms of violence against and torture of children.

The UK government is to be commended for its global leadership on a range of issues related to addressing violence against children, including its substantial and catalytic support for the Global Partnership to End Violence Against Children. The FCDO should continue its strong support of the partnership and take up DFID's former role on the Board and Executive Committee.

We commend the UK government's leadership in supporting the WeProtect Global Alliance and its international movement, whose goal is the elimination of online sexual exploitation of children. We also commend of the positive role it is playing in international efforts to prioritise effective safeguarding of vulnerable constituencies, in partnership with Bond, its enhanced safeguarding due diligence framework, its investment in initiatives to better protect children and adults, its commitment to improve reporting and data collection, its improved international recruitment practices, and the development of the international Safeguarding Resource and Support Hub.

Yet, when addressing SDG 16.2 in its recent voluntary national review, the UK government limited itself to discussing the confrontation of sexual exploitation and trafficking, without mentioning corporal punishment under indicator 16.2.1, thus ignoring the most common form of violence against children.

319. UK Parliament, International Development Committee (23 September 2021), ['Aid Cuts for 'priority' African Countries "outrageous and hypocritical"'](#) [online article, accessed June 2022]

320. The 3% East Africa figure is the average of the 2022 appeals for Ethiopia, Somalia, and South Sudan. UN OCHA Financial Tracking Service country figures in March 2022: Ethiopia: 0 funding for \$2.75bn appeal; Somalia: \$54.8m funding of \$1.46bn appeal (3.8%); and South Sudan: \$130.6m funding of \$1.67bn appeal (7.8%)

The UK government should also promote the use of child rights impact assessments (CRIA) to identify the potential impact that a decision can have on a child, or a group of children, affected by it. The FCDO should integrate CRIA across its programme and project cycle management, including as part of due diligence and project appraisal processes.

Target 16.2:

Promote the rule of law at the national and international levels and ensure equal access to justice for all, Target 16.10: Ensure public access to information and protect fundamental freedoms, in accordance with national legislation and international agreements and Target 16.b: Promote and enforce non-discriminatory laws and policies for sustainable development

The UK government's Integrated Review of Security, Defence, Development and Foreign Policy asserts its 'support of open societies and promotion of human rights'³²¹. Yet a number of developments put the UK's reputation as an open, tolerant and diverse modern society at risk.

Deprivation of citizenship

In 2014, amendments to the British Nationality Act 1981 extended deprivation of citizenship powers to the Home Secretary if they had reasonable grounds to believe a person could be naturalised as a citizen of another country, even if it risked making that person stateless if, for example, the other country refused to recognise them as nationals. The recent Nationality and Borders Bill has increased these powers. The effect of these laws were racially discriminatory because they had a disproportionate impact on non-White British people. This means 41% of non-white British citizens (or nearly six million people in England and Wales) could potentially be deprived of their citizenship due to their dual national status.³²² These laws also affect the ability of these citizens to participate in civil society and public life, not only because they effectively given them a 'second tier' status, but because their ability to exercise freedom of speech and assembly could be impacted by the precariousness of their contingent citizenship rights. Rendering people stateless, and by extension their children, is inconsistent with efforts to ensure a legal identity for all under Target 16.9, and it is inconsistent with efforts to promote an open society.

321. HM Government (2021), [Global Britain in a Competitive Age: the Integrated Review of Security, Defence, Development and Foreign Policy](#)
322. The New Statesman, 1 December 2021, ['Exclusive: British citizenship of six million people could be jeopardized by Home Office plans'](#) [online article, accessed June 2022]

Exploitation and trafficking

The pioneering Modern Slavery Act 2015 was the first of its kind in Europe, but its intended effect has been undermined in various ways. Victims of modern slavery and human trafficking in the UK have been improperly jailed in breach of the Modern Slavery Act 2015. As many as one in twelve female prison inmates serving sentences are victims of modern slavery and trafficking but their exploitation has not been acknowledged, and several others have been deported by the Home Office³²³. Among those that are evidently cases of slavery or trafficking, one in four women became pregnant, a third of these arising from rape by their enslavers, and they were not given access to antenatal care from the NHS. The UK's approach has come under criticism for its heavy reliance on prosecutions to the detriment of victim support. Despite this, the number of both prosecutions and convictions for human trafficking and modern slavery in the UK are considerably lower than in other countries³²⁴. Experts, lawyers and the police have reiterated that, unless victims feel safe and supported with ongoing financial, legal and pastoral care, they will continue to distrust the authorities and are unlikely to come forward and provide evidence against their enslavers³²⁵. The qualified nature of the UK's support package is a major contributing factor to the low conviction rates. Its 'move-on' support can include ongoing accommodation, counselling, expert advice and advocacy, but only for a limited period of 45 days.

Hostile environment policy

Target 16.b is one that the UK government finds particularly challenging in many respects, both at home and in its efforts to end poverty globally. The use of citizenship deprivation and the unintended consequences of the Modern Slavery Act are related to the broader 'hostile environment' policy, promoted since 2014. This policy is both a catalyst and a symptom of the UK's worsening ethnic and racial disparity³²⁶.

People have been deported to countries where it was known they would be at risk of being tortured or killed. This violates the principle of non-refoulement in international law and Article 3 of the European Convention on Human Rights and the Human Rights Act 1998. Additionally, we continue to see the deleterious impacts of the hostile environment policy on the lives of all ethnic minorities, regardless of their migration

status or nationality³²⁷, including the under-reporting of crimes against undocumented people, and a lack of access to healthcare, particularly during the Covid-19 pandemic³²⁸. The UK has adopted practice which is contrary to the tide of international best practice³²⁹. Never has this been more apparent than in the UK's decision to 'offshore' asylum application processing, which has been widely assessed as something that is unlawful³³⁰, exposes vulnerable people to risk³³¹, discriminatory, overreaching³³² and hugely costly³³³.

We commend the broad commitments made by the UK government to the people of Ukraine fleeing conflict, in particular the *Homes for Ukrainians* scheme and the Ukraine Family Scheme, however we are concerned at the disparity of treatment between Ukrainians and Afghans. Arguably, the UK government has a higher duty of responsibility to the Afghans who need to flee their country since the Taliban takeover, as the UK government was instrumental in supporting and encouraging equality for women and girls, accountability, democracy and human rights in Afghanistan. The failure to match the Ukraine effort with equivalent arrangements for Afghans raises the question of whether the racial or religious characteristics of the two populations have had any bearing on decision-making in these two responses.

The domestic picture sheds light on the low prioritisations of policies that embed non-discriminatory approaches in development programmes. As reported under several other goals, projects that tackle root causes of inequality have been cut in preference to others in several areas. The appetite of the UK government to take on the risk, expense and complexity of the 'harder cases' may have been eroded by the cuts and the merger combined. This has presented officials with very difficult decisions to make based on imperfect information in a very short time frame, and with diminishing levels of expertise in teams as a result of shifting roles and responsibilities accompanied by resignations of expert staff. The UK government needs to take steps to ensure that the fourth 'E' in value for money considerations (Equity) is clearly signalled to staff as a priority, and not an optional extra that can be sacrificed when budgets are reduced, with linked monitoring and enforcement that meaningfully delivers on equity alongside other value-for-money considerations.

323. The Independent (16 September, 2018), '[Female trafficking victims unlawfully held in UK jails due to "disturbing" failure to identify exploitation, finds report](#)'; The Independent (11 June, 2018), '[Government under fire for "outrageous" treatment of modern slavery victims facing deportation from UK](#)' [online articles, accessed June 2022]

324. Uddin, N. (2017), '[The Fight Against Modern Slavery and Human Trafficking: the role of victim support in prosecuting this crime](#)'

325. The Independent (5 December, 2018), '[UK "lagging behind" on efforts to tackle modern slavery as victims not given adequate support, report warns](#)' [online article, accessed June 2022]

326. UN Working Group of Experts on People of African Descent (19 April 2021), '[UN Experts Condemn UK Commission on Race and Ethnic Disparities Report](#)' [online media release, accessed June 2022]

327. UN Special Rapporteur on contemporary forms of racism, racial discrimination, xenophobia and related intolerance (27 May 2019), '[Visit to the United Kingdom of Great Britain and Northern Ireland, UN Doc A/HRC/41/54/Add.2](#)' [p.17]

328. The Guardian (18 September 2021), '[Asylum seeker given £100,000 hospital bill after suffering stroke](#)'

329. The Tribune (2 July, 2020), '[Coronavirus and the Hostile Environment](#)' [online article, accessed June 2022]

330. FCDO (8 July, 2021), '[UN Human Rights Council: Universal Periodic Review Adoption – Rwanda](#)' [online statement, accessed June 2022]

331. US State Department (2021), '[Country Reports on Human Rights Practices: Rwanda](#)'

332. Andrew Smith MP, Director of Policy, cited in BBC News (15 April, 2022), '[Rwanda asylum seekers: UK could send first people "within weeks"](#)'

333. The Guardian (17 April, 2022), '[Home Office chief questions whether Rwanda plan will deter asylum seekers](#)' [online article, accessed June 2022]

Target 16.4 and 16.5:

By 2030, significantly reduce illicit financial and arms flows, strengthen the recovery and return of stolen assets and combat all forms of organised crime and Target 16.5: Substantially reduce corruption and bribery in all their forms

Two years into the Covid-19 pandemic, Transparency International's 2021 Corruption Perceptions Index reveals that corruption levels have stagnated worldwide. The results clearly demonstrate that countries with well-protected civil and political liberties generally controlled corruption better. This correlation highlights the undeniable relationship between fundamental freedoms of association and expression and low levels of corruption. Indeed, corruption enables human rights abuses and democratic decline, which in turn leads to increased corruption, creating a vicious circle.³³⁴

In 2016, the UK hosted the Anti-Corruption Summit in London, which saw 43 governments and 6 international organisations issue a bold Global Declaration Against Corruption³³⁵. At the Summit, the UK government made a number of commitments relating to illicit financial flows and should be commended for having met a number of these commitments. However, sound laws are inadequate if enforcement agencies are not properly resourced. The National Crime Agency estimates that the UK loses around £290 billion every year to fraud and money laundering, which equates to nearly 15% of GDP. By comparison, anti-corruption charity Spotlight on Corruption estimates that the average amount spent each year on law enforcement agencies is a mere £852 million, the equivalent to just 0.09% of total government spending or 0.042% of GDP.³³⁶

Research by Transparency International UK identified 929 UK-registered companies involved in 89 global corruption and money laundering schemes worth around £137 billion.³³⁷ To prevent the abuse of UK legal entities the UK government should reform company law to make it more difficult for criminals to access them, and it should create a credible deterrent against deliberate false reporting to Companies House. The UK government should also extend the 'failure to prevent' approach, which is used in corporate criminal offending, to economic crimes such as fraud and

money laundering, and task the Law Commission with the priority of reviewing the UK's outdated and inadequate corporate liability laws.

Progress with the British Overseas Territories and Crown Dependencies is still lagging. Research by Transparency International UK identified 1,201 corporate vehicles from these jurisdictions alleged to have been used in 237 large-scale corruption and money laundering cases worth over £250 billion – equivalent to the entire UK ODA budget for the past 20 years³³⁸. The UK government should work with these jurisdictions to close these loopholes as soon as possible by setting out public and time-bound plans to establish public registers of beneficial ownership.

Target 16.7:

Ensure responsive, inclusive, participatory and representative decision-making at all levels.

The Integrated Review of Security, Defence, Development and Foreign Policy highlighted the UK's support of open societies as 'crucial building blocks' for transparent and accountable governance, noting the deterioration in global freedoms since the mid-2000s and an increasing prevalence of autocracies worldwide.³³⁹ The review acknowledged that efforts to reverse this decline must start at home and committed to work with civil society worldwide to protect democratic values.³⁴⁰ Nevertheless, references to open societies were notably absent from the new international development strategy³⁴¹.

Against this background, we strongly urge the UK government to revoke restrictions on peaceful procession, assembly and protest, recently imposed by Part 3 of its Police, Crime, Sentencing and Courts Act. It must also evaluate the misuse of strategic lawsuits against public participation (SLAPPs), targets of which are often journalists, civil society organisations and whistleblowers. These lawsuits have a chilling effect on free speech. At a time when the right to protest is under attack around the world, the UK should be setting a positive example, rather than making it harder for people to speak out.

334. Transparency International (25 January, 2022), '[CPI 2021: Corruption, Human Rights and Democracy](#)' [online article, accessed June 2022]

335. UK Government (9 December, 2016), '[Policy paper: Global Declaration Against Corruption](#)' [online, accessed June 2022]

336. Spotlight on Corruption (2022) '[Closing the UK's economic crime enforcement gap: Proposals for boosting resources for UK law enforcement to fight economic crime](#)'

337. Transparency International UK, (2019) '[At Your Service](#)'

338. Transparency International UK (2018), '[Cost of Secrecy](#)'

339. HM Government (2021), '[Global Britain in a Competitive Age: the Integrated Review of Security, Defence, Development and Foreign Policy](#)'

340. Ibid. at para 9

341. Ibid. p. 47-48



Target 16.10:

Ensure public access to information and protect fundamental freedoms, in accordance with national legislation and international agreements

Tackling the killings of human rights defenders is an area in which the UK is well-suited to play a positive role. As UN Secretary General António Guterres noted, a threat to human rights defenders is part of a wider attack on civil society.³⁴² Linked, as it is in many cases, to anti-corruption efforts, the UK could engage on this issue as part of its priority focus on women and girls, as anti-corruption is the area that places female human rights defenders most at risk³⁴³. In 2021, the Special Rapporteur's report to the Human Rights Council showed that a culture of impunity, where very few are arrested and prosecuted for killings, serves to embolden the perpetrators and continues the cycle of violence.³⁴⁴ Often, criminal justice systems are themselves corrupt.

Other human rights defenders who appear to be disproportionately at risk include environmental activists, such as those protesting land grabs and representing the rights of indigenous people. One in two victims of killings recorded in 2019 by OHCHR worked with communities around land issues and the environment, with half of the killings in Columbia and the Philippines. The Special Rapporteur noted that since 2015, when the OHCHR began keeping records, there had been 1,323 recorded killings in 64 countries. The Special Rapporteur has asked States to intervene, but to date no State had engaged with the mandate to explore ways to stop these killings. This is a cause that is waiting for a champion – a role that the UK is well-placed to fulfil, with the right political will.

To contribute to SDG 13, the UK government should:

1. Invest targeted money in tackling the root causes of conflict, not least severe inequality and poverty, with strong local participation, leadership and accountability
2. Expand on the new international development strategy, with concrete targets for conflict-prevention and peacebuilding spending and outcomes.
3. Approach fragility and emergencies across the world as a single systemic failure that requires a joined-up and holistic response.
4. Improve the flexibility of grants in fragile and conflict-affected contexts, not least when it comes to underspend and carryover.
5. Increase the use of child rights impact assessments.
6. Cease the punitive use of citizenship deprivation where it could leave individuals stateless.
7. Suspend arms transfers where there is a realistic possibility of human rights violations by recipients.
8. Commit greater resources to pursue perpetrators of modern slavery violations.
9. Restore its focus on open societies for the sake of promoting human rights and preventing conflict.
10. Close legal loopholes affecting British Crown Dependencies, limit the use of SLAPPs, and take further steps to tackle corruption as a source of instability and human rights abuses, not least against women and girls.
11. Scrap the off-shoring of asylum applications and create safe, legal routes for migration without criminalising those seeking refuge.

342. UN (2020), [The Highest Aspiration: a call to action for human rights](#), [p.7]

343. Kvinna till Kvinna Foundation (2021), ['Solidarity is our only weapon – the situation of women human rights defenders'](#) [p.10]

344. Special Rapporteur for the situation against human rights defenders, Mary Lawlor (24 December 2020), [Final Warning: death threats and killings of human rights defenders UN Doc A/HRC/46/35](#) [p.4]