HOW TRANSPARENT IS UK AID?
A review of ODA spending departments

January 2020
Publish What You Fund is the global campaign for aid and development transparency. Launched in 2008, we envisage a world where aid and development information is transparent, available and used for effective decision-making, public accountability and lasting change for all citizens.

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Executive Summary

The UK government’s 2015 aid strategy included the re-commitment to spend 0.7% of gross national income on official development assistance (ODA). It also set out a cross-government approach to aid spending, drawing on the expertise of government departments other than the Department for International Development (DFID). In 2018 DFID spent 75% of the aid budget and the remaining 25% was spent by 14 different government departments. These ODA-spending departments now need to meet ODA transparency standards. The provision of transparent aid data allows both aid recipients and taxpayers to scrutinise how aid is being spent and assess if it is being delivered effectively and providing value for money. The 2015 aid strategy set a target for all government departments to be ranked as “Good” or “Very Good” in the Aid Transparency Index within five years.

In order to assess progress against this target, DFID asked Publish What You Fund to carry out a review of UK aid transparency. Between April and October 2019, we used our Aid Transparency Index methodology to score departments against transparency indicators and rank them according to their levels of transparency. The process involved engagement, data collection, feedback and an independent review. We were asked to assess ten of the government departments that are spending significant amounts of ODA. We also carried out narrative reviews of two of the new cross government funds – the Conflict, Stability and Security Fund (CSSF) and Prosperity Fund.

KEY FINDINGS

Three government departments have reached the level of transparency set out in the 2015 UK Aid Strategy. DFID has maintained its “Very Good” score, ranking first among the departments. The Department of Health and Social Care (DHSC) came in second place, also with a “Very Good” score, while the Department for Business, Energy and Industrial Strategy (BEIS) ranked third, with a score in the “Good” category. This is a significant achievement for DHSC and BEIS, as it was their first assessment.

Some departments being scored for the first time were also able to achieve positive results, scoring in the upper half of the “Fair” category. These were the Department of Digital, Culture, Media and Sport (DCMS), the Department for Environment, Food and Rural Affairs (DEFRA) and the Home Office.

The Foreign and Commonwealth Office (FCO) improved on its “Poor” ranking from the 2018 Index, moving into the “Fair” category for the first time, in joint seventh place with the Ministry of Defence (MOD). This was largely thanks to more regular publication of data to the International Aid Transparency Initiative (IATI) registry. The MOD was last assessed in the 2014 Index when it scored “Very Poor”. Its score in the “Fair” category in this assessment is a significant improvement. The MOD is now publishing detailed information about its projects and policies to the IATI registry and could further improve its score by increasing the regularity of its publication and publishing more project documents.

All assessed departments are now publishing data to the IATI registry. The Department for Education (DFE) and Department for Work and Pensions (DWP) started publishing to IATI for the first time, but publish infrequently and with limited data about their projects, scoring them in the “Poor” and “Very Poor” categories respectively. A large part of their ODA spend is on in-country refugees and asylum-seekers, which is based on estimates of the number of users or claimants. As such it is more difficult for them to produce detailed project information and documentation. However, it is important that they provide as much information as possible about the way their ODA resources are used.
EXECUTIVE SUMMARY

Performance (project information used to track performance and impact) was the worst scoring component across all departments. Four of the departments scored no points for any of the performance indicators. Three departments published good quality results data: DFID, Home Office and BEIS, and three published reviews and evaluations of their projects: DFID, DHSC and BEIS.

There were two rounds of data collection and the departments significantly improved their scores during the process. The average score across departments increased from 41.9 from the first data collection to 56.5 from the second. During the process departments also significantly increased the amount of data they are making publicly available on the IATI registry.

While it is important to recognise the hard work and achievements of the departments to make significantly more and better data available about their ODA policies, projects and programmes, there is much still to be done in order to reach the government’s own targets. Three of the departments reached the target, but seven departments fell short and will need to make significant improvements.

RECOMMENDATIONS

- Departments should maintain and embed publishing practices into administrative systems, so that publishing frequency is maintained. Departments should also maintain and improve data quality.

- Those departments that achieved good results should share lessons and good practice with lower-scoring departments through the cross-government transparency working group.

- In some cases, organisational cultural changes will be needed for departments to publish evaluations and results – particularly when these show projects under-performing or failing.

- Departments should use the aid data that their own and other departments are now publishing.

- Departmental sign-off procedures should be adapted to allow regular publication to IATI while making sure that sensitive information is adequately reviewed or protected.

- Document publication should be improved to provide consistent, useful project information.

- Departments should implement policies that allow the publication of more granular project information and performance-related data, as well as project contracts and procurement information.

- There have been challenges around forward-looking data during this review, but more could be done by several departments to publish forward-looking line-item budgets at the project-level.

- The Treasury should publish the rationale behind its aid allocation and prioritisation decisions.

- It is important that the UK’s next aid strategy maintains the commitment to aid transparency. Measurable transparency targets for aid spending departments are an effective way of doing this.

- This report also includes specific recommendations for CSSF, Prosperity Fund and the ten departments reviewed.
Background

The UK government launched its current aid strategy in November 2015 – "UK aid: tackling global challenges in the national interest". The strategy used the 2015 spending review to re-commit to the target to spend 0.7% of gross national income on official development assistance (ODA), and at the same time to change the way aid is spent by the UK government. The strategy re-framed the ODA budget as international aid in the national interest, with a focus on global issues, including migration and disease, terrorism and climate change – all of which are presented as a direct threat to the UK, as well as to aid recipient countries.

An important part of the new strategy is the cross-government approach. While the Department for International Development (DFID) continues to spend the majority of the aid budget, increasing amounts of aid are now channelled through other departments too. This approach aims to draw on the expertise of government departments in their respective sectors (e.g. health, energy, environment, business). Departments bid for ODA funds during the 2015 spending review, with decisions taken by a panel convened by the Treasury (HMT), with high-level DFID representation. Three cross-government funds were also set up (two of which: the Conflict, Stability and Security Fund (CSSF) and Prosperity Fund are reviewed later in this report), as well as the £1.5bn Global Challenges Research Fund, managed by the Department for Business, Energy and Industrial Strategy (BEIS); funds managed by the Department of Health and Social Care (DHSC) to support medical research, and at least £5.8bn of international climate finance, to be spent by BEIS, DFID and the Department for Environment, Food and Rural Affairs (DEFRA).

By 2018, 15 government departments were spending ODA. 14 of these spent 25% of the annual aid budget (£3.65bn; DFID spent the other 75%, £10.9bn). Annual allocations range from the BEIS 2018 ODA spend of £849m (0.99% of its total budget), and the Foreign and Commonwealth Office (FCO) which spent £633m (32.4% of its total budget), to the Ministry of Defence (MOD) which spent £5m of ODA from a total defence budget of £53bn.

While this shift in the way the UK government spends aid can take advantage of the specialisms of government departments, they have also had to develop new capacities in order to meet the more rigorous requirements for spending and reporting on ODA flows.

Among the challenges has been the need to meet ODA transparency standards. ODA is fundamentally different from other financial flows since it is intended to promote the economic development and welfare of developing countries – where many live with poverty or extreme poverty – and so carries additional responsibilities and obligations. This includes the provision of transparency information to allow scrutiny of how aid is spent by both the recipients of aid as well as the taxpayers whose money is spent to alleviate poverty.
The 2015 aid strategy calls for government departments to adhere to aid transparency standards, setting targets to be assessed using Publish What You Fund’s Aid Transparency Index methodology, which assesses whether and how donors are publishing aid data in the International Aid Transparency Initiative (IATI) Standard, as well as what information they make available through their websites and aid information portals. Section 4.11 of the strategy states:

The government will aim for the first time, for all UK government departments to be ranked as ‘Good’ or ‘Very Good’ in the international Aid Transparency Index, within the next five years. In addition, it will work with and encourage all implementing partners of UK aid, including private contractors and recipient governments, to meet global transparency standards.

UK ODA spending is held accountable by a number of institutions and committees. The Independent Commission for Aid Impact (ICAI) was set up in 2010 to scrutinise UK aid spending. It reports to the parliamentary select committee, the International Development Committee (IDC). ICAI carries out reviews that focus on specific country, regional or thematic spend, as well as on particular funds or approaches to aid delivery. The National Audit Office also reviews aid spending, reporting to the parliamentary Public Accounts Committee. As well as parliament, UK civil society holds aid spending to account through targeted advocacy and campaigns. One of the principal mechanisms for this is the coordination of groups through the Bond international development NGO membership network.

Transparency is both a means and an end for accountability of aid spending. Accountability actors hold the government to account for its transparency commitments and transparency data is, in turn, used to assess whether the government is delivering aid effectively and providing value for money. An ICAI rapid review into “How UK aid learns”, published in September 2019, provided a snapshot of the state of transparency across departments prior to the UK aid transparency review:

So far, progress is mixed across the departments. Some have yet to generate expenditure data in the right format. BEIS, DCMS, Defra, DHSC, FCO, ONS [Office for National Statistics], MOD and DIT [Department for International Trade] are all publishing at least some of their data to the IATI standard, but DWP [Department for Work and Pensions], DfE [Department for Education], HM Treasury, HMRC [HM Revenue and Customs], UKEF [UK Export Finance] and the Cabinet Office are yet to do so. DFID has created an online tool, DevTracker, that summarises data published by any UK government department – and some implementing partners – to the IATI standard. This tool is able to produce convenient summaries of UK aid by country, sector or spending department, although for the time being the data on non-DFID expenditure is incomplete. (paragraph 4.42)

ODA transparency requirements go above and beyond the transparency required for many other types of government activity. For many of the ODA spending departments this has required new systems to be set up and new capacities to be developed. Some ministries operate with a presumption of confidentiality and a sophisticated bureaucracy to manage levels of access to information. For these departments, meeting transparency standards for ODA spending requires adaptations in both systems and organisational culture. Our experience shows that some of the best practice in aid transparency is the result of an organisation-wide culture of transparency, with senior-level buy-in, whereby aid transparency is built into operating procedures and practices.

In 2019 Publish What You Fund carried out a review of UK aid transparency using the Aid Transparency Index process and methodology to assess ten of the government departments spending significant amounts of ODA. We also carried out reviews of two of the new cross government funds, the CSSF and Prosperity Fund. This report presents the findings of the review, identifies where departments have been successful in making information about their policies and projects transparent, and where more work needs to be done. It also offers a set of recommendations to be acted on in order to further improve UK aid transparency and to reach the government’s own targets.
Process and methodology

In order to assess progress by government departments against the UK Aid Strategy targets, Publish What You Fund was asked by DFID to carry out a review of UK aid transparency from April to October 2019, using Publish What You Fund’s Aid Transparency Index methodology to score departments against transparency indicators and rank them according to their levels of transparency. We were asked to assess 10 of the government departments spending significant amounts of ODA:

- Department for International Development (DFID)
- Department for Business, Energy and Industrial Strategy (BEIS)
- Foreign and Commonwealth Office (FCO)
- Home Office
- Department of Health and Social Care (DHSC)
- Department for Environment, Food and Rural Affairs (DEFRA)
- Department for Work and Pensions (DWP)
- Department for Education (DFE)
- Department of Digital, Culture, Media and Sport (DCMS)
- Ministry of Defence (MOD)

We were also asked to review two of the cross-government funds – the CSSF and Prosperity Fund.

**BOX 1: The Aid Transparency Index**

The Aid Transparency Index was developed by Publish What You Fund in order to monitor the transparency of aid and encourage donors to publish more and better data. The first Index was published in 2011. In 2013, the methodology was revised to put more emphasis on publication to IATI – the voluntary global standard for the publication of aid data. The methodology, revised again in 2017 to make it even more robust, aims to encourage donor agencies to move beyond previous transparency commitments and improve the quality and usefulness of their data. Now run biannually, the last Index was produced in 2018 and assessed 45 of the world’s leading development agencies, including DFID (ranked “Very Good”) and the FCO (ranked “Poor”).

The UK Aid Transparency Review process began with a three-month engagement period from April to June 2019 to explain the review methodology to the government departments, provide advice on improving transparency and data publication, and assess whether modifications would need to be made to the assessment approach.
To reflect the fact that most of the departments being assessed do not have aid delivery as their primary function, the following minor changes were made to the review methodology:

- Departments spending smaller amounts of ODA were not expected to produce all of the organisation-level documents given the relative size of their project portfolios. Those spending under $250m per annum (approx. £190m) would in theory have been excluded from the 2018 Aid Transparency Index.

- For these departments, we did not expect to see a full, stand-alone ODA strategy to meet the Organisation Strategy indicator. Instead we accepted a section within an overall departmental strategy/plan with forward-looking information outlining the general approach to the department’s ODA-funded work for international development.

- For these departments we also did not expect to see the more detailed Country/Sector Strategies or MoUs and accepted the detail in the departmental strategy for this indicator.

For the cross-government funds included in the review – the CSSF and Prosperity Fund – we decided not to score and rank them against the assessment indicators since other government departments that are spending the resources from these funds are responsible for publishing information about the projects being implemented. Instead, we have included a narrative assessment of the funds’ transparency, including recommendations to improve their disclosure practices.

Following the consultation period, data collection began on 1st July. The assessment process was iterative and results and findings were shared with the government departments as they became available. The government departments under review were able to respond to the findings and submit additional evidence through the Aid Transparency Tracker, Publish What You Fund’s online portal, used to run the Index and other reviews. The tracker displays the results of tests run for each of the transparency indicators, and allows organisations under review to view and comment on their assessments.

The assessments also went through an independent review process. Researchers who are independent of Publish What You Fund and the government reviewed the findings and were able to submit additional evidence to support their conclusions.

A final download of data from the IATI registry was carried out at the end of the process on 30th September, before the final scores were calculated and analysed.

**FIGURE 1: UK Aid Transparency Review timeline**

| 1st July: First IATI data pull | Manual survey | IATI data sampling | 22nd July: Initial results shared with departments | Scores passed to independent reviewers | 30th Sept: Final IATI data pull | Final manual survey | 20th Oct: Final scores calculated | Final IATI sampling |
Key findings

**GRAPH 1: Overall scores and rankings**

<table>
<thead>
<tr>
<th>Department</th>
<th>Very Good</th>
<th>Good</th>
<th>Fair</th>
<th>Poor</th>
<th>Very Poor</th>
</tr>
</thead>
<tbody>
<tr>
<td>DFID</td>
<td>86.9</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>DHSC</td>
<td>82.1</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>BEIS</td>
<td>72.2</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>DCMS</td>
<td>58.8</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>DEFRA</td>
<td>55.4</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Home Office</td>
<td>54.7</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>FCO</td>
<td>48.9</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>MOD</td>
<td>48.9</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>DFE</td>
<td>37.5</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>DWP</td>
<td>19.6</td>
<td></td>
<td></td>
<td></td>
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</tr>
</tbody>
</table>

**KEY HIGHLIGHTS AND FINDINGS**

“Good” and “Very Good” scores for some departments

Three of the government departments assessed have reached the level of transparency set out in the 2015 UK Aid Strategy, with scores in the “Very Good” and “Good” category. DFID has maintained its “Very Good” score, ranking first among the departments. The DHSC came in second place, also with a “Very Good” score, while BEIS ranked third, with a score in the “Good” category. For the two departments being assessed for the first time, the DHSC and BEIS, this is a significant achievement and they are to be congratulated for publishing good quality, detailed information about their aid spending policies and projects. Publishing detailed data and documentation about their aid projects means their ODA expenditure can be scrutinised, learned from and improved through public accountability. While they have demonstrated that they can achieve a good standard of transparency, it will be important to maintain this by continuing to publish high-standard data on a regular basis.
Other departments did well for their first assessment

Other departments being scored for the first time were also able to achieve positive results, scoring in the upper half of the “Fair” category. The DCMS narrowly missed out on the “Good” category, scoring 58.8 points, and DEFRA and the Home Office both scored in the mid-50s, providing a good basis for further improvement. These departments are all regularly publishing data to the IATI registry and are providing detailed documents about their projects and policies.

Improvements from previous assessments (FCO and MOD)

The FCO was able to improve on its “Poor” ranking from the 2018 Index, moving into the “Fair” category for the first time, in joint seventh place with the MOD. This was largely thanks to more regular publication of data to the IATI registry – the FCO is now publishing on a quarterly basis. In order to improve further and achieve higher scores in future assessments, the FCO will now need to start disclosing more high-quality, granular information about its projects including budget breakdowns, procurement documents (contracts and tenders) and performance-related data including objectives, results and evaluations.

The MOD was last assessed in the 2014 Index when it scored “Very Poor”. Its score in the “Fair” category in this assessment is a significant improvement. The MOD is now publishing detailed information about its projects and policies to the IATI registry and could further improve its score by increasing the regularity of its publication, and by publishing more project documents, including performance data.

All departments now publishing to the IATI registry

The other departments in the assessment are also now publishing data to the IATI registry, albeit less frequently and with less information disclosed about their projects. The DFE and DWP started publishing to IATI for the first time and published limited data about their projects, scoring them in the “Poor” (DFE) and “Very Poor” (DWP) categories. It should be noted that a large part of the ODA spend of both the DFE and DWP is on services or benefits for in-country refugees and asylum-seekers, which are based on estimates of the number of users or claimants. As such, it is more difficult for them to produce some of the detailed project information and documentation expected in the review. However, given that they are using ODA for these costs it is important that they provide as much information as possible about the way those resources are being used.

More work needed on performance-related data

The parliamentary Public Accounts Committee’s report into ODA spending (September 2019) criticised HMT for only recently introducing an assessment framework to track progress against the UK Aid Strategy, and for the fact that this framework does not consider value for money or the impact on overall effectiveness of the decision to channel aid through government departments. It also raised concerns about the lack of performance-related data:

In addition, gaps in departments’ information mean they cannot always assess the performance of their ODA-funded programmes.
These concerns have been borne out in the findings of the assessment. The methodology groups indicators into five components of aid transparency: Organisational commitments and planning, Finance and budgets, Project attributes, Joining-up development data and Performance.

The Performance component refers to project information that can be used to track performance and impact, including objectives and results, reviews and evaluations and pre-project impact appraisals. This was the worst scoring component in the review across all of the departments. Four of the departments scored no points for any of the performance indicators. Just three departments were publishing good quality results data – DFID, Home Office and BEIS – and three were publishing reviews and evaluations of their projects – DFID, DHSC and BEIS.

In some cases this was due to documents and data failing the manual sampling process. Documents that failed sampling were often out of date, did not meet the criteria or were general documents that did not contain project-specific information. Reviewing departmental approaches to publishing results information, more careful quality checking of documents and more timely publication of results and evaluations would help to improve scoring against these indicators in future.

**GRAPH 2: Performance component scores by department**

Significant improvements from first to second round of data collection

Most of the government departments significantly improved their scores from the first to the second round of data collection. The average of the scores for the ten departments, increased by 14.6 points from the first round of data collection (average of 41.7) to the second round (56.5 average). Notable improvers were BEIS, DCMS and the Home Office, which improved by 20.2, 26.2 and 16.3 points respectively (each moving up a category). MOD also moved from the “Poor” to “Fair” category, increasing by 11.6 points from the first to second round, and DFE and DWP both made significant improvements from a very low base in the first round.
**KEY FINDINGS**

**GRAPH 3:** Change in scores from first to second round of data collection by department

<table>
<thead>
<tr>
<th>Department</th>
<th>July</th>
<th>Sept.</th>
</tr>
</thead>
<tbody>
<tr>
<td>DFID</td>
<td>87.3</td>
<td>86.9</td>
</tr>
<tr>
<td>DHSC</td>
<td>78.6</td>
<td>72.2</td>
</tr>
<tr>
<td>BEIS</td>
<td>52.0</td>
<td>44.1</td>
</tr>
<tr>
<td>DEFRA</td>
<td>48.9</td>
<td>39.1</td>
</tr>
<tr>
<td>FCO</td>
<td>55.4</td>
<td>54.7</td>
</tr>
<tr>
<td>Home Office</td>
<td>48.9</td>
<td>48.9</td>
</tr>
<tr>
<td>MOD</td>
<td>58.8</td>
<td>32.6</td>
</tr>
<tr>
<td>DCMS</td>
<td>3.8</td>
<td>3.8</td>
</tr>
<tr>
<td>DFE</td>
<td>19.6</td>
<td>3.8</td>
</tr>
<tr>
<td>DWP</td>
<td>3.8</td>
<td>3.8</td>
</tr>
</tbody>
</table>

**More data available**

During the review process, departments significantly increased the amount of data they are making publicly available on the IATI registry about their projects and policies. The number of activities the departments publish on the registry increased by 78% – from 3,307 on 1st April when the review process began to 5,874 when the data collection period ended on 30th September. The general increase in scores also indicates that significantly more information is now being published about each of these activities. Notable increases in numbers of activities published were made by BEIS and DEFRA.

**GRAPH 4:** Increase in number of BEIS activities published to the IATI registry

0K 1K 2K 3K

**Apr 8** **Apr 22** **May 6** **May 20** **Jun 3** **Jun 17** **Jul 1** **Jul 15** **Jul 29** **Aug 12**
More organisation-level documents were also published to the IATI registry during the review period. The Organisational commitments and planning component of the methodology looks at whether departments are making policy and strategic documents available, including: organisational strategies, annual reports, allocation policies, audited accounts and procurement policies. In our first round of data collection we found 19 of these organisation-level documents published to the IATI registry across the ten departments. This number had increased to 33 when we reviewed the departments’ IATI data at the end of the process.

We also heard anecdotally from departments that the review process had helped them to get their internal data management systems and the data itself in order. This can be seen as a secondary benefit of increased transparency – exposing data to the public eye provides a good incentive to tidy-up beforehand. Public scrutiny can also help to correct errors and inaccuracies in datasets and drive continuous improvement in accuracy and data quality.
IATI publication frequency and the need to maintain regular publication

An important feature of the IATI standard is the timeliness of data published to the registry. Data can be uploaded and updated on an ongoing basis, providing up-to-the-minute information that can be used to inform decision-making by partner country governments and by civil society organisations to hold donors to account. This is reflected in the review scoring approach which rewards timely IATI publication through higher scores for activity-related indicators.

The government departments did well to improve or maintain their publishing frequency during the review process, with seven of the ten departments now publishing data to the IATI registry on a monthly or quarterly basis. While this is reflected in the scores these departments received for the review, it will be important for them to embed regular publication as part of their reporting systems and procedures and that regular publication is maintained, to ensure that the most recent data is available.

**TABLE 1: IATI publication frequency by department**

<table>
<thead>
<tr>
<th>BEIS</th>
<th>DCMS</th>
<th>DEFRA</th>
<th>DFE</th>
<th>DFID</th>
<th>DHSC</th>
<th>DWP</th>
<th>Home Office</th>
<th>FCO</th>
<th>MOD</th>
</tr>
</thead>
<tbody>
<tr>
<td>Quarterly</td>
<td>Monthly</td>
<td>Quarterly</td>
<td>Less than quarterly</td>
<td>Monthly</td>
<td>Quarterly</td>
<td>Less than quarterly</td>
<td>Less than quarterly</td>
<td>Quarterly</td>
<td>Quarterly</td>
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</tbody>
</table>

Much still to be done

While it is important to recognise the hard work and considerable achievements of government departments to make significantly more and better data available about their ODA policies, projects and programmes, there is much still to be done in order to reach the government’s own targets. While three of the departments reached the target of a “Very Good” or “Good” score in the assessment, seven departments fell short and will need to make significant improvements to their transparency. Those that did score in the top two categories could also do more to improve their scores, particularly by making more performance-related information available. The following section contains an analysis of scores by department and includes specific recommendations for each department to improve their data and transparency practices. At the end of this section is also a list of general recommendations relevant across the departments.
Cross-government ODA transparency working group, learning and capacity building

The ICAI review into “How UK aid learns” highlights the importance of sharing practice across departments:

Peer-to-peer exchange among professionals can be one of the most effective methods of learning. Communities of practice have developed across government among staff performing similar tasks in support of UK aid to share learning and develop relationships. (4.31)

To support departments’ transparency efforts, DFID has set up a cross government working group on transparency, which now meets on a regular basis to share good practice on transparency, provide training and learn about the transparency tools and approaches that are available.

As well as sharing practical information, this type of group can also help departments overcome some of the obstacles to greater transparency by providing examples of senior level buy-in and how to resource a successful transparency operation.

One challenge for this type of exchange is the variety of different departments participating, including in size and amount of ODA being administered, as well as the differences in culture from department to department. However, none of the departments is totally unique in its profile and there are opportunities for departments to learn from those that have common issues. In practice, the departments have formed natural clusters through the group, and an informal community of practice has developed on the back of the formal group.

Transparency itself is also a catalyst for wider cross-government learning. The ICAI review highlights the need for active exchange of knowledge and learning across departments if new ODA spenders are to meet international best practice in aid delivery, including financial management, procurement, programme design and monitoring and evaluation. Transparency is one way to share information and learning within government as well as outside.

BOX 2: Secrets of success – internal transparency working groups, systematic approaches and senior-level buy-in

DHSC and BEIS, the two best-performing departments other than DFID, both approached their transparency in a structured way. Both set up their own, internal ODA transparency working groups to coordinate their approaches and systems. These working groups developed detailed plans which included specific milestones the respective teams would meet during the process. They also worked with simplified approval processes involving senior-level buy-in that delegated responsibility to the ODA teams without the need for lots of senior sign-off.

In the case of BEIS, a key factor in its success was bringing delivery partners and arm’s-length bodies into the process, rapidly getting them up to speed and ensuring they publish to the required standard and timetable. This was particularly important for BEIS given its business model and the amount of data it needed to publish.

By taking a structured, strategic approach to transparency, DHSC and BEIS were able to develop effective systems to publish high-quality data to a regular schedule. This was reflected in their overall scores and both managed to reach the strategic target of “Good” or “Very Good” in the assessment.
General recommendations

- Departments have made significant improvements to their ODA transparency, particularly by publishing good quality data to the IATI registry and in many cases doing this on a regular basis. These gains should be consolidated by maintaining and embedding publishing practices into administrative systems, so that publishing frequency is maintained. Departments should also focus on how to maintain and improve data quality so that all departments achieve “Very Good” or “Good” scores in future assessments.

- Those departments that achieved good results should share lessons and good practice with lower-scoring departments through the cross-government transparency working group.

- In some cases, organisational cultural changes will be needed for departments to publish evaluations and results – particularly when these show projects under-performing or failing. Project failure is more common in aid and development than in some other sectors, given the inherent challenges and need to innovate, and publishing negative evaluations should be encouraged as a way to learn from mistakes and improve practice in the future.

- Departments should use the aid data that their own and other departments are now publishing. As well as a valuable resource, using the data is a highly effective way to improve data quality, correct inaccuracies and generate buy-in for greater aid transparency.

- Departmental sign-off procedures should not stand as obstacles to aid transparency. While some information may need to be protected or withheld, sign-off procedures should be adapted to allow regular publication to IATI while making sure that sensitive information is adequately reviewed before release.

- Document publication should be improved to provide consistent, useful information about projects. Several departments failed sampling on project document-related indicators because documents were out of date, did not provide project specific information or did not meet the criteria.

- As well as improving document quality, some policy changes will be required by departments to publish more granular information about their projects. As well as performance-related data, several departments should look to implement policies that will allow the publication of project contracts and procurement information, details of implementing partners and terms and conditions these are subject to.

- While there have been specific challenges around forward-looking data during this review that relate to the UK budget cycle and spending review which has prevented departments from publishing three-year organisational budgets, more could be done by several departments to publish forward-looking line item budgets at the project level.

- Few departments were able to provide policies or rationale for their aid allocation across countries, regions and sectors. Several departments indicated that these decisions are made by HMT. In order to understand the allocation policy of aid disbursement through government departments, HMT should publish the rationale behind its allocation and prioritisation decisions.

- The current UK Aid Strategy runs to 2020. Should the UK government decide to develop a new aid strategy it will be important to maintain the UK’s commitment to aid transparency – if a new strategy continues the approach of ODA delivery through government departments, maintaining measurable transparency targets for aid spending departments is an effective way of doing this.
Department scores and profiles

Department for International Development (DFID)

OVERVIEW

DFID is the main bilateral aid agency in the UK which administered 74.8% of UK ODA in 2018. DFID became an IATI member in 2008 and first published to the IATI Registry in January 2011. DFID’s largest country programmes in 2018/19 were Ethiopia (£304m) and Pakistan (£272m), and its largest spending divisions were the International Relations Division (£2.224bn) and Economic Development Division (£2.05bn).

SCORE: 86.9
POSITION: 1/10
VERY GOOD


Due to a methodology change after 2016, results are not directly comparable.

INDIVIDUAL COMPONENT SCORES:

Organisational planning and commitments 14.7 / 15
Joining-up development data 18.6 / 20
Finance and budgets 20.4 / 25
Performance 17.6 / 20
Project attributes 15.6 / 20

ANALYSIS

DFID remains in the “Very Good” category in this review. It continues to publish project data to IATI on a monthly basis, though its score has gone down by four points since the 2018 Index. It scored over 80% of the points in all components except for project attributes.

DFID ranked highest in the review for Performance-related information, such as results and evaluations, where it is the best performing organisation. DFID scored at least two points above average across all indicators here, however, publication of results can be improved upon, having scored 3.5/5.

DFID also makes all Finance and budget information available on the IATI registry scoring above average on these indicators. DFID scored lower than in previous years for forward-looking budget information, partly due to uncertainty about future budgets given the upcoming spending review.

For the Joining-up development data component DFID ranked joint first with DHSC. However, there is room for improvement in the publication of contracts and tenders, where less than half of activities were found to contain this information. DFID published documents to the IATI registry for all of the indicators in the Organisational planning and commitments component.

Finally, DFID achieved its worst score for the **Project attributes** indicators. While many indicators, such as sector information and dates scored well, DFID was let down by its descriptions which failed IATI sampling. DFID also failed IATI sampling for sub-national locations.

**RECOMMENDATIONS:**

- DFID should prioritise the publication of meaningful descriptions and sub-national locations to the IATI registry.
- DFID should make further improvements to its publication of contracts and tenders, as well as results.
- DFID has been a leader in promoting aid transparency across government departments by running a cross government aid transparency working group, providing guidance and training on transparency of aid data, and by promoting publication of data to IATI and DFID’s DevTracker. This is an important and valuable role which DFID should continue to play.
Department for Health and Social Care (DHSC)

OVERVIEW

The Department for Health and Social Care (DHSC) received its first substantial allocation of ODA funding in 2015. In 2018 they spent 1.4% of UK ODA3 or just over £200m, making it the sixth largest ODA spending department. DHSC started routinely publishing to IATI in 2018.

DHSC currently manages three programmes to contribute to achieving the objectives of the UK aid strategy: the Global Health Security programme (£477m) contributes to a world safe and secure from infectious disease threats and promotes Global Health as an international security priority; the Global Health Research programme (£429.5m) supports high-quality applied health research and training to address global health challenges in areas which are underfunded or where there is an unmet need; and the FCTC 2030 project (£15m) supports the implementation of the World Health Organisation’s Framework Convention on Tobacco Control in low- and middle-income countries (LMICs).

INDIVIDUAL COMPONENT SCORES:

- Organisational planning and commitments: 15 / 15
- Finance and budgets: 22.2 / 25
- Project attributes: 17.4 / 20
- Joining-up development data: 18.6 / 20
- Performance: 9.0 / 20

ANALYSIS

DHSC reached the “Very Good” category for its first aid transparency assessment, coming in a close second behind DFID – a considerable achievement.

It publishes data to the IATI registry on a quarterly basis and consistently publishes good quality data across all components assessed in the review. DHSC scored full points for Organisational planning and commitments with data on all indicators. DHSC ranked first in the Finance and budgets component, scoring close to full points for all of the indicators. Some improvements could be made in project level budgets and documentation as forward-looking budgets were not always available with a quarterly breakdown and line-item budgets were only found for half of the activities reviewed.

DHSC ranked joint-first with DFID in the Joining-up development data component with improvements only needed on procurement data – contracts and tenders. It ranked fourth, across the departments, in the Project attributes component. Although DHSC published across all indicators there are still improvements to be made in sub-national locations which were only present in 2% of activities.

DHSC received its lowest score for its Performance data, ranking third with 9/20 points. While DHSC is publishing good-quality objectives and evaluations for most of its projects, results data and pre-project impact appraisals failed our sampling checks.

RECOMMENDATIONS:

- DHSC should prioritise improving the quality and amount of performance data, particularly results of its large portfolio of research projects.
- DHSC can also improve by publishing more sub-national locations for its projects.
- DHSC could also improve the usefulness of its data by increasing IATI publishing frequency from quarterly to monthly.
Department for Business, Energy and Industrial Strategy (BEIS)

OVERVIEW

BEIS has been administering ODA funds since 2014. As the second largest spender in 2018 its share increased to 5.8% of the UK ODA budget (£851m) which was split across two major funding streams: research and innovation and climate finance. BEIS oversees two research funds – the Newton Fund (totalling £735m from 2016–2021) and the Global Challenges Research Fund (£1.5bn for 2016–2021) – and it delivers the UK’s International Climate Finance (ICF) along with DFID and DEFRA. BEIS started publishing to the IATI registry in 2018 and added the bulk of its project data in 2019.

SCORE: 72.2
POSITION: 3/10

GOOD

INDIVIDUAL COMPONENT SCORES:

Organisational planning and commitments 15 / 15
Finance and budgets 17.2 / 25
Project attributes 17.4 / 20

Joining-up development data 12.7 / 20
Performance 9.9 / 20

ANALYSIS

BEIS scored comfortably in the “Good” category, ranking third out of the ten departments being reviewed. BEIS should be congratulated for reaching the UK Aid Strategy target in its first assessment.

BEIS currently publishes data to the IATI registry on a quarterly basis. For the Organisational planning and commitments component, it ranked joint first along with DHSC, above DFID, achieving full scores across all indicators. BEIS also scored well in the Project attributes component with above average scores for most of the indicators. There are still improvements to be made in sub-national locations – less than 1% of the activities reviewed were found to have detailed geo-locations.

BEIS ranked third in the Finance and budgets component. For project-level financial data, particularly project budgets, disbursements and expenditures, publication is not consistent enough across all activities. Line item budget documents failed sampling since the budget documents did not meet the criteria for the indicator.

In Joining-up development data, BEIS scored poorly, ranking seventh. It failed sampling of its conditions data and also needs to improve publication of contracts and tenders. Finally, BEIS achieved its worst score for its Performance data. It scored above average for project objectives, but only published results and evaluations for a few activities.

RECOMMENDATIONS:

• BEIS needs to focus on producing more and better performance data, in order that users can view outcomes against their clear objectives.
• BEIS should aim to publish data on a monthly basis, particularly considering it is a high spending department.
• BEIS should improve its project level financial data, particularly for the large funds it administers.

Department for Digital, Culture, Media and Sport (DCMS)

OVERVIEW

The DCMS had an ODA budget of £9m in 2018, having started spending in 2017. With three active projects it is a small spender. Its current projects are: the Cultural Protection Fund, the Digital Access Programme and contributions for Marlborough House, the Commonwealth Headquarters. DCMS first published to IATI in mid-2019 and was publishing on a monthly basis when we carried out the review.

SCORE: 58.8
POSITION: 4/10
FAIR

INDIVIDUAL COMPONENT SCORES:

Organisational planning and commitments 9.4 / 15
Joining-up development data 13.3 / 20
Finance and budgets 16.9 / 25
Performance 3.3 / 20
Project attributes 15.9 / 20

ANALYSIS

DCMS ranked first in the “Fair” category. It scored well in the Finance and budgets component, particularly on capital spend and publishing disbursements and expenditure. Improvements could be made in the publication of budgets.

DCMS also scored well for some of the Joining-up development data indicators, with full points for aid type, finance type and flow type. No procurement information was published, however, resulting in no score for contracts or tenders. The conditions indicator failed our sampling since general terms and conditions documents were published that were not activity-specific.

For Project attributes, DCMS scored well across the majority of indicators, but did not publish sub-national location data. In Organisational planning and commitments, DCMS published three of the five documents in its IATI files, missing an organisation strategy, which failed our quality checks since no information about ODA spending could be found, and an allocation policy.

Finally, DCMS provided data for only one Performance indicator – objectives. No other data was published for evaluations, results or impact appraisals. There is significant room for improvement in providing this information about DCMS projects.

RECOMMENDATIONS:

- DCMS should start publishing performance-related data, such as results data and reviews and evaluations.
- DCMS should continue to publish data to the IATI registry on a monthly basis.
- DCMS should publish procurement information, including tenders, contracts and conditions of its projects.
- DCMS needs to publish allocation and strategy policies in order to ensure its organisational file is up to date.
Department for Environment, Food and Rural Affairs (DEFRA)

OVERVIEW

In 2018 DEFRA spent 0.5% of UK ODA – £70m. This proportion of the ODA budget has stayed consistent across the years since 2014. DEFRA activities include contributions to secondary implementers such as the Inter-American Development Bank for environmental conservation and deforestation, various international environmental treaty bodies, and agricultural science research through Kew Gardens. DEFRA also implements ODA projects through programmes such as the Darwin Initiative, a UK grant scheme for research on bio-diversity. DEFRA began publishing IATI data in 2014 although it only added its organisational files in early 2019.

SCORE: 55.4
POSITION: 5/10
FAIR

INDIVIDUAL COMPONENT SCORES:

Organisational planning and commitments 9.4 / 15
Joining-up development data 15.5 / 20
Finance and budgets 10.2 / 25
Performance 2.5 / 20
Project attributes 17.8 / 20

ANALYSIS

DEFRA publishes data to the IATI registry on a quarterly basis. In the Project attributes component it scored above average across most indicators, particularly activity dates and implementer data. DEFRA did particularly well in sub-national location data, scoring 67% of the points, the second best score for this indicator.

In Joining-up development data DEFRA ranked third after DFID and DHSC. This was due to its consistent publication of contracts, along with high scores for aid and finance type information for the majority of its activities. Improvements need to be made in publication of conditions data and tenders.

In Finance and budgets, DEFRA ranked seventh, scoring poorly because it failed to publish detailed budget breakdowns or capital spend data for its projects. Other project financial data, including commitments, disbursements and expenditure and total project budgets could also be improved.

In Organisational planning and commitments DEFRA ranked sixth. Key documents such as its annual report and strategy failed our manual checks since they did not sufficiently detail ODA spend.

Finally, on Performance data, DEFRA achieved a low score because its objectives, results and evaluations failed our sampling. It did relatively well on the pre-project impact appraisal indicator, however.

RECOMMENDATIONS:

• DEFRA should improve the quality of performance data, such as objectives, results and evaluations, which failed sampling because it was too high level or out of date.
• DEFRA should aim to publish on a monthly basis.
• DEFRA should detail ODA spending in its annual report and strategy and publish its ODA spending allocation policy.
Home Office

OVERVIEW

The Home Office is the fourth largest ODA spending department and has significantly increased its ODA budget in the last few years, from £136m in 2014 to £337m in 2018 – 2.3% of the total ODA budget. This spending includes work to tackle modern slavery, sustainable reintegration and rehabilitation of returned asylum seekers including victims of trafficking and capacity building in ODA eligible countries in areas of intelligence gathering, border enforcement and tackling online child sexual exploitation. The Home Office publishes data to the IATI registry on a less than quarterly basis.

SCORE: 54.7
POSITION: 6/10
FAIR

INDIVIDUAL COMPONENT SCORES:

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<td>12.8 / 25</td>
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<td>12.4 / 20</td>
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<td>11.5 / 20</td>
</tr>
<tr>
<td>Performance</td>
<td>6.9 / 20</td>
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</table>

ANALYSIS

The Home Office ranked in the middle of the “Fair” category and sixth overall with a score of 54.7. This is reflected in its individual component scores and rankings which generally ranked fifth or sixth.

The Home Office provided documents in its IATI data for four of the Organisational planning and commitments indicators but fell short on its annual report which failed our manual checks because it did not detail ODA spending. It also did not publish country or sector strategies.

The Home Office published data against all of the Project attributes indicators except sub-national location information. In Finance and budgets it achieved average scores for the majority of indicators but failed in the quality checks for line-item budget documentation.

For the Joining-up development data component, the Home Office published data about the aid, finance and flow type for all of its activities. It is publishing some contracts, but improvements could be made to publish contracts more comprehensively. Project conditions documentation and tenders failed sampling as documents did not meet the criteria or contained general information, not specific to the activity it was published for.

The Home Office scored its lowest scores for its Performance data. It did well on publishing objectives and results but its pre-project impact appraisals and evaluation documents failed sampling as it did not meet the indicator criteria.

RECOMMENDATIONS:

- The Home Office needs to improve the quality of its published documents, particularly those that provide information about project performance.
- It should move to at least quarterly publishing of IATI data to ensure up to date information is available.
- The Home Office scored zero for at least two indicators across each component, so improved publication across the board is encouraged.
Foreign and Commonwealth Office (FCO)

OVERVIEW

The FCO ODA spending has increased by £267m since 2014, and now comes to £633m, 4.4% of UK ODA in 2018, making it the third largest ODA spending department. This includes overseas diplomacy-related costs in ODA eligible countries (Frontline Diplomatic Activity) and some contributions to multilateral organisations. ODA also funds activities of the British Council and BBC World Service. The FCO first published to the IATI registry in 2013 and now publishes data about more than 300 active projects. In addition, the FCO spends significant amounts of ODA from cross-government funds, including the Prosperity Fund and the Conflict, Stability and Security Fund (see section below for more details).

2018: Poor  2014: Poor  2013: Poor

Due to a methodology change after 2016, results are not directly comparable.

INDIVIDUAL COMPONENT SCORES:

Organisational planning and commitments 11.3 / 15
Finance and budgets 11.0 / 25
Project attributes 13.9 / 20
Joining-up development data 12.7 / 20
Performance 0 / 20

ANALYSIS

The FCO scored joint fourth in the “Fair” category with an identical score to the MOD. This is a noteworthy move up from the “Poor” category in the 2018 Aid Transparency Index.

The FCO now publishes data to IATI on a quarterly basis for which it was awarded additional points across its IATI activity-related indicators. The FCO has improved its scores in the Organisational planning and commitments and Finance and budgets components since the 2018 index.

In the Organisational planning and commitments component, the FCO ranked fifth. Although it publishes documents across the majority of the indicators, the allocation policy failed our quality checks as it did not cover all of the FCO’s portfolio of programmes.

The FCO ranked sixth in Finance and budgets, picking up 44% of the available scores here. It has improved upon its 2018 score by publishing more of its disbursement and expenditure data, some capital spend information and some project and organisational budget data. It is still not publishing commitments data in IATI, however, and line-item budget documents failed sampling because documents did not meet the criteria.

The FCO published IATI data for four out of the seven indicators in the Joining-up development data component. These were: aid type, flow type, finance type and tied aid status. However, project conditions and contracts failed our quality checks because they were too generic and did not meet the criteria.
The FCO has slightly improved on its **Project attributes** score since 2018. High quality descriptions and titles are being published in the IATI format, however, no sub-national location data was published so points were lost here. Data on implementer names and project activity dates can also be improved upon. The FCO scored no points in the Performance component. Documents were published against the indicators but these all failed sampling. Documents generally failed as they missed the criteria because they were too general, summaries were published rather than full versions of documents or they were not specific to the project in question.

**RECOMMENDATIONS:**

- FCO failed to score three indicators on average per component, so quality and comprehensiveness needs to improve across the board.
- Key organisational planning documentation should be published such as an overall allocations policy and country/sector strategies.
- FCO should improve its publication of key documents including those related to project performance, project budgets and contracts, all of which failed sampling this time.
Ministry of Defence (MOD)

OVERVIEW
The MOD is the smallest ODA spender among the departments in the review, with a £5m ODA spend in 2018. Its ODA budget is spent mainly on educational and capacity building activities, located in the UK, focused on security and leadership in humanitarian crises. It also channels funding to the UK Hydrographics Office for port surveys in ODA eligible countries. It began publishing to IATI in 2015 and published its organisational file in 2017. It now publishes data on a quarterly basis.

2014: Very Poor 2013: Very Poor

Due to a methodology change after 2016, results are not directly comparable.

INDIVIDUAL COMPONENT SCORES:

Organisational planning and commitments 9.4 / 15  Joining-up development data 12.7 / 20
Finance and budgets 8.5 / 25  Performance 0 / 20
Project attributes 18.3 / 20

ANALYSIS
The MOD performed best on Project attributes, where it ranked first among all of the departments, scoring 92% of the points. It gained above average scores across all indicators and particularly on sub-national locations for which it achieved the highest score in the review.

For Joining-up development data, MOD also scored above average for its aid and finance type indicators gaining 63% of the score for this component. However, it lost points for procurement-related indicators since it is not publishing contracts or tender documents.

The MOD published Organisational planning and commitments documents for three of the indicators, but its organisational strategy failed manual checks because it did not contain information about its ODA spending approach.

For Finance and budgets, the MOD published data for three out of seven indicators. It failed to publish any forward-looking budgets at the activity or organisation level.

MOD failed to gain any points in the Performance component because it failed to publish performance data across its activities. Objectives data failed our sampling because it did not meet the criteria as project objectives.

RECOMMENDATIONS:
• MOD has done well by systematically publishing basic project information, in order to further improve transparency it will need to start publishing more granular information.
• MOD should start publishing forward-looking data across the budget-related indicators, at both the organisation and project levels.
• MOD should start publishing the objectives and results of its projects as well as any evaluations as these become available.
• MOD should publish information about its ODA spending strategy.
Department for Education (DFE)

OVERVIEW

The DFE was scored for the first time and ranked in the “Poor” category. DFE began calculating its ODA spending in 2015 and its estimated spending in 2018 was £20m. Its ODA spend is on education for asylum seeker applicant children in England during their first 12 months in the country, which is calculated as an estimate of the department’s annual schools budget. It began publishing data to the IATI registry in 2019.

SCORE: 37.5
POSITION: 9/10
POOR

INDIVIDUAL COMPONENT SCORES:

Organisational planning and commitments 8.4 / 15
Joining-up development data 12.1 / 20
Finance and budgets 4.6 / 25
Performance 0 / 20
Project attributes 12.4 / 20

ANALYSIS

The unusual nature of DFE’s ODA activity, whereby it does not have an ODA budget but rather a proportion of its overall schools budget is classified as ODA spending, means it is more challenging for it to provide comprehensive data about its activities. This is particularly the case for performance related data and forward-looking budgets. However, given that ODA is being used to fund these activities, the same standards of transparency have been applied, and we hope that efforts can be made to provide some of this data in the future.

For its Organisational planning and commitments documents DFE failed to gain IATI scores in three indicators: audit, organisational strategy and allocation policy. It did, however, publish an annual report and a procurement policy in its IATI data.

For Project attributes and Joining-up development data it scored just over 60% of the available points due to missing sub-national location and procurement data as well as its low publication rate (annual).

Poor scores in Finance and budgets (4.6 points) and Performance data (0 points) show significant room for improvement. For Finance and budgets, only disbursements and capital spend details were published. While DFE may not currently set out objectives or measure progress towards these for its ODA expenditure, providing information about the aims and outcomes of its activities would be beneficial to explain the rationale behind using ODA for in-donor refugee/asylum seeker costs.

RECOMMENDATIONS:

- We encourage DFE to improve its organisational file by publishing policy documents on its strategy and approach to ODA allocation.
- We encourage DFE to start publishing basic performance-related data, particularly on how it measures up against its internal objectives and targets.
- DFE’s low publication frequency can easily be improved, so we encourage it to increase to, at least, quarterly IATI publication.
Department for Work and Pensions (DWP)

OVERVIEW

The DWP spent £25m of ODA in 2018. Currently DWP has two ODA activities: the annual UK International Labour Organisation contribution and benefit payments to Syrian refugees as part of the Vulnerable Persons Resettlement Scheme. It first published to IATI in 2013.

SCORE: 19.6
POSITION: 10/10
VERY POOR

INDIVIDUAL COMPONENT SCORES:

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<td>Performance</td>
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</tr>
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</table>

ANALYSIS

Like DFE, the unusual nature of DWP’s ODA activity means it is more challenging for it to provide comprehensive data about its activities. DWP has provided minimal data about its ODA spend on IATI. However, like DFE, given that ODA is being used to fund DWP’s activities, the same standards of transparency have been applied, and we hope that efforts can be made to provide some of this data in the future.

DWP picked up IATI scores in only two components: Finance and budgets and Project attributes. For Project attributes, DWP has published the basic data available such as descriptions, dates and titles.

For the Finance and budgets component only project budgets were published to IATI – these have been published in full as annual and quarterly figures.

In the Joining-up development data and Performance components DWP failed to publish any data, so it scored zero. DWP did not publish an IATI organisational file so it only scored against indicators where we found documents published on the GOV.UK website.

As with DFE, we would encourage DWP to provide information about the aims and outcomes of its ODA spend to help explain the rationale behind using ODA for in-donor refugee/asylum seeker costs.

RECOMMENDATIONS:

- DWP should publish more data to the IATI registry, including an organisational file containing annual reports, audited accounts and procurement policies along with other information about ODA spending.
- DWP should start publishing more regular and comprehensive data about ODA expenditure to the IATI registry.
- We encourage DWP to start publishing basic performance related data to show the aims and results of its ODA spend.
Cross-government funds

Two major cross-government funds channel UK ODA to government departments: the Prosperity Fund and the Conflict, Stability and Security Fund (CSSF). The funds were launched in 2015 to support the 2015 UK Aid Strategy and the Strategic Defence and Security Review. The funds are directed by the National Security Council (NSC). Ministerial oversight for the cross-government funds sits with the Minister for the Cabinet Office and issues relating to the funds are discussed and endorsed by the NSC. A Joint Funds Unit (JFU) reporting to the Cabinet Office National Security Secretariat, has responsibility for the management and administration of the funds.

Each fund has a specific mandate: the CSSF focuses on conflict prevention and instability, which threaten UK interests, while the Prosperity Fund programmes focus on generating economic growth, working in areas such as anti-corruption and economic reform. The funds disburse ODA and non-ODA to government departments to fund and deliver cross departmental activity through geographic and thematic programmes. Both funds include portions of non-ODA spend for activities that are not ODA eligible.

THE CONFLICT, STABILITY AND SECURITY FUND (CSSF)

The CSSF is intended to contribute to the achievement of the UK’s national security and aid objectives. The fund was allocated a £1.03bn annual budget when it was established in 2015. In 2019 the fund was allocated £1.3bn. The CSSF settlement in the 2019 spending round included an uplift in ODA funding for 2020/21. On top of flat real growth on the 2019/20 ODA budget, HMT provided an additional £50m of ODA.

CSSF funds are disbursed through 13 government departments and agencies. In the 2018/19 financial year, 62% of total spend (£784.7m) went through the FCO, while the MOD spent 18.7% (£234.9m) and DFID 10.1% (£127.2m). The 2018/19 total spend was split by £648m non-ODA and £609m ODA. Afghanistan (£65m) and Iraq (£33m) were the largest recipient countries of CSSF ODA. The largest areas of thematic spend were security sector reform (£176.8m) and economic development and livelihoods (£107.1m).

CSSF TRANSPARENCY

The CSSF has been the subject of several governmental reviews since its creation, including a review by the ICAI and the “Capability review of cross-government funds” undertaken as part of the wider “National security capability review” (both published in March 2018). The parliamentary Joint Committee on the National Security Strategy (JCNSS) is also currently carrying out an inquiry into the CSSF, having concluded a previous inquiry in the 2016/17 session.
The 2018/19 CSSF Annual Report outlines improvements that have been made following these reviews. New policies and processes have been put in place in the areas of monitoring, evaluation, learning and training, conflict and gender sensitivity and procurement. While it is welcome to hear that the fund is now operating with more robust internal processes, we recommend that the CSSF publishes more of these documents in order to build greater trust and accountability. The following documents are referenced in the report and we encourage these be made available in the public domain:

- Programme theories of change and results frameworks, including indicators and milestones for success.
- Eight contracts with monitoring, evaluation and learning (MEL) suppliers.
- Independent evaluations of thematic areas and programmes (we welcome that the intention to make these public is stated in the annual report).
- Human rights risk assessments of programmes (including overseas security and justice assessments [OSJAs]).
- Gender audits of CSSF programmes.
- Project procurement, including tenders and awarded contracts (the procurement framework can currently only be accessed by registering as a supplier).

We also note the lesson learned from CSSF’s July 2018 workshop around communicating impact and suggest the use of transparency mechanisms such as IATI as one of the potential channels through which impacts can be shared as both documents and quantitative results.

In response to calls in the reviews and inquiries for greater transparency, the CSSF now publishes programme summaries for the majority of its programmes (83 out of 94 for 2019/20, 83 out of 90 for 2018/19 and 66 out of 90 for 2017/18), programme annual reviews for 2016/17 and 2017/18 and institutional annual reports for 2016/17, 2017/18 and 2018/19. The programme summaries are forward-looking and published mid-year (dated according to the corresponding financial year) and include information about lead partner(s), country or region, programme duration, allocated budget (ODA and non-ODA), contact details, programme components, description and rationale – including expected results and a review of the programme management.

According to written ministerial evidence provided to the JCNSS inquiry, there is a presumption to publish information on all CSSF programmes, however, given the sensitive nature of programming it does withhold partial or full information about some programmes for security reasons. Decisions about whether programme information should be withheld are made by regional and thematic boards, and exemption requests are then reviewed by the head of the CSSF (see Question 6 in the written evidence).

The annual reviews (65 for 2018/19) include most of the information set out in the programme summaries and also a scored assessment of outputs, an outcome assessment and score, a risk rating and annual programme performance scores, details of UK support are provided and a summary of progress with lessons learned and recommendations.

To provide fuller transparency about its programmes, we encourage the CSSF to publish the full programme reports and annual reviews that these summaries are extracted from. Government departments that achieve “Very Good” ratings in our assessments publish full business cases and annual reviews that provide detailed breakdowns of programme rationales and performance, outputs and outcomes. Publishing these documents builds trust that these programmes are well designed and that they are subject to rigorous monitoring and evaluation processes.
Civil society actors who are monitoring the activities of the CSSF have also highlighted that one of the key challenges in understanding what the CSSF is trying to achieve is the lack of transparency of NSC strategies, which remain out of the public domain. These cover many of the objectives CSSF is working to in any given context or on specific themes, e.g. counter migration. Recommendation 2 in the “Capability review of the cross-government funds” called for public facing versions of these documents, and the written evidence to the JCNSS inquiry stated that these are planned for publication in 2019.

The CSSF registered as an IATI publisher with a unique identifier and began publishing data to the IATI registry in August 2019. So far it has published data on 75 programmes. CSSF publishes activities at the programme level and so does not include specific project information. Individual government departments are also publishing their CSSF-funded activities under their own unique identifiers – an appropriate publishing model would be for the spending departments to link these activities to the corresponding programmes as published by the CSSF, thereby joining-up development data and allowing funds to be traced up the aid delivery chain.

**TRANSPARENCY BY COMPONENTS**

**Organisational planning and commitments**

CSSF has uploaded an organisation file to IATI and has included policy documents in the file.

According to the 2018/19 annual report, the allocation process for CSSF discretionary budgets was determined by a NSC sub-committee, chaired by the Chancellor of the Duchy of Lancaster. 2018/19 and 2019/20 country allocations were announced by ministerial statement in July 2018 and July 2019. Additional detail about the allocation process is available in Annex D: CSSF Governance section of the 2018/19 annual report.

The CSSF strategy follows objectives from the National Security Strategy and UK Aid Strategy. Summary information about the fund is provided on its “About” page, however, no comprehensive strategy document for the fund is available. While the JFU states that the CSSF contributes to the delivery of government strategies, we believe a single overarching CSSF strategy should be present considering the scale and importance of the funding.

CSSF has a cross-government procurement framework that has been tendered, however, only limited information could be found about this. For specific programmes, departments are required to use their individual departmental procurement policies.

**Finance and budgets**

CSSF provides forward-looking annual total organisational budgets, however, these currently run to 2020. We would hope to see three-year forward looking budgets in the future. No individual project budget breakdowns are available per year or quarter. The programme summaries include some breakdown of budgets into specific programmes – we would like to see more granular budget information than this. Since these are published mid-year, the budgets are six-month forward looking at the point of publication, however, there are periods during the year when no forward-looking information is available.

Disbursement transaction data is available across the activities published in IATI, however, these do not contain commitment amounts (total funds committed to a programme or project). We could not find details of capital spend percentages in these programmes.
Project attributes and Joining-up development data

CSSF generally publishes project attributes on IATI with the exception of sub-national locations. Programme information including flow types, aid types, finance types and tied aid status are published in CSSF’s IATI data. However, we could not find any published contracts or terms and conditions or project tender information.

Performance

The 65 annual review summaries can be found in the CSSF’s IATI organisation file. We recommend that these be linked to the CSSF’s corresponding activity files in IATI. As mentioned above, these are review summaries, however, and are not full evaluations.

Expected programme outputs and outcomes are included in the programme summary documents, however, there is some inconsistency of the level of objectives included – often either outputs or outcomes are included but a full results framework is not published. A theory of change outlining expected impacts, outcomes and outputs would provide a fuller picture of the intentions and planning of the interventions. The annual summaries include a summary of progress and scores against the outputs and outcomes, but they do not include a consistent approach to reporting programme results or details of learning and whether changes to the programme have occurred or are needed.

No pre-project impact appraisals are currently available for CSSF programmes.

PROSPERITY FUND

The Prosperity Fund follows a national security objective: to promote UK prosperity, and a UK aid objective: to promote global prosperity. Its programmes are framed within the Sustainable Development Goals (SDGs), particularly SDG 8, which aims to promote sustainable economic growth. The fund delivers mainly through multi-year programmes, mainly in middle-income countries, and in doing so aims to generate opportunities for the private sector, including UK businesses, as a secondary objective. The fund has an allocated budget of £1.2bn up to 2023 – this includes a small non-ODA component of £33m used to help generate opportunities for UK business in the fund’s target countries.

The Prosperity Fund has 27 large programmes operating in 21 countries in Africa, Asia and Latin America. Total spend by the fund in 2018/19 was £126m – £9.88m of this was non-ODA. Of the ODA portion, 42.8% was spent by the FCO, 38.02% by DFID, 9.31% by HMT and 8.2% by the Cabinet Office. The largest recipients of ODA from the Prosperity Fund are Mexico, Brazil, India and China, all of which have an estimated spend of over £100m.

PROSPERITY FUND TRANSPARENCY

The Prosperity Fund has been subject to review by the ICAI which carried out a rapid review in February 2017 and a follow-up review in June 2018. The rapid review found that transparency was significantly lacking, stating that “at present there is very little information on the Fund in the public domain”. This raised concerns about conflicts of interest around involvement of private firms in the development and design of the fund and its programmes. Recommendation number 5 of the report called for the Prosperity Fund to “establish its procedures on the basis of full transparency in line with the government’s public stance on this issue”.


The 2018 follow-up review noted improvements around transparency of the Prosperity Fund’s procurement procedures and engagement with suppliers, and slow improvement regarding transparency on spending and results.

According to the 2017/18 Prosperity Fund annual report the Infrastructure and Projects Authority has carried out four reviews of the fund. However, these could not be found online. We encourage publication of these reviews to help illustrate the oversight and accountability processes the Prosperity Fund is subject to. Responsibility for publication of these reviews lies with the reviewing body rather than with the funds themselves.

The 2017/18 and 2018/19 annual reports outline the fund’s approach to monitoring, results, evaluation and learning (MREL) and the frameworks and procedures used to plan and assess the programming of the fund. We encourage the Prosperity Fund to make more of this information available to allow public scrutiny of these processes and to demonstrate the intended results and rationales behind the fund’s interventions. The fund’s overall theory of change is published as an annex in the annual reports. However, it is also mentioned that each programme will have project-specific theories of change and results frameworks. We strongly encourage publication of these documents, as well as programme outcomes and results. Likewise, the fund plans to aggregate outcomes across its programmes into a set of portfolio indicators. Publication of these indicators is welcome, but we also encourage transparency of ongoing results against the indicators to show how the work of the fund is progressing at the macro-level.

Like the CSSF, the Prosperity Fund publishes programme summaries with top line information about programmes including implementing departments, beneficiary countries, start and end dates and budget, programme overview and rationale, details of work streams and secondary benefits.

The GOV.UK website lists projects against their implementing department, with links to programme documents. Full business cases are published for some of the programmes. We encourage publication of the business cases for all of the Prosperity Fund programmes.

Civil society actors monitoring the Prosperity Fund identified human rights impact assessments as key documents they would like to see for programmes that are operating in post-conflict or conflict affected areas, such as Colombia. Likewise, where the fund is supporting the construction of infrastructure, pre-project environmental impact assessments should be made available. Where business cases have identified the need for vulnerable groups to be involved in the design of projects, details of who was consulted and the results of these consultations should be made accessible.

The Prosperity Fund registered as an IATI publisher in August 2019. It has published 27 activities to the IATI registry, 26 of which are in implementation. The Prosperity Fund also publishes an IATI organisation file which includes organisation-level documents, annual expenditure and aggregated budgets up to March 2023.

**TRANSPARENCY BY COMPONENTS**

**Organisational planning and commitments**

While the 2018/19 annual report includes a map outlining allocations across countries. No information could be found about the policy and process for deciding country allocations. However, programme allocation criteria are summarised in the value for money section of the “Further Information” webpage on the fund.

Annual reports are available for 2016/17, 2017/18 and 2018/19.
While the Prosperity Fund theory of change is available as an annex in the 2017/18 annual report, we could not find an overarching strategy document for the fund.

The Prosperity Fund programmes are implemented by government departments that follow their own procurement policies. The GOV.UK website also references a “Cross-government Prosperity framework” as the preferred route to market, but there is no further information available about this. We encourage complete transparency of the procurement process and publication of tenders and awarded contracts to ensure trust and accountability are maintained.

Stand-alone country and sector strategies are not available. Eleven business cases are available across three departments – FCO, DFID and HMT. Business cases have been published for the fund’s Mexico, Colombia and Association of Southeast Asian Nations (ASEAN) programmes, and these include strategic cases for their respective programmes. Six thematic business cases are available, along with the business case for the contribution to the Asian Infrastructure Investment Bank (AIIB) Special Fund.

**Finance and budgets**

Three years of forward-looking organisational budgets are available in the Prosperity Fund’s IATI organisation file. Forward-looking, disaggregated country budgets are not available.

Programmes published in IATI have indicative budgets for the life of the project, however, these are not broken down by year or by quarter. We did find some line item budgets in business case documents, however, these are not published systematically across Prosperity Fund programmes.

No details of capital expenditure could be found. Individual disbursements to departments are included in IATI activity files, however, details are only included for 2018/19 projects and the most up to date data is missing.

**Project attributes and Joining-up development data**

Activities on IATI generally include project attributes including start and end dates, contact information, activity status, titles and descriptions, implementing departments and sector codes.

Programme information including flow types, aid types, finance types and tied aid status are published in the fund’s IATI data. Some tender information is available on the Prosperity Fund commercial framework page on the GOV.UK website, however, information is limited to the names of suppliers without details of the specific projects awarded or the value, timeframe or terms and conditions of the contracts.

**Performance**

There is no performance information included in the Prosperity Fund’s IATI activity data. Publication of performance data elsewhere is highly inconsistent.

Some programmes have published business cases that include objectives and expected results. Annual reviews have been published for some of the programmes that have been running for more than a year, including publication of results against objectives. DFID has published logical frameworks for some of the programmes it is implementing. Business cases also sometimes include cost-benefit analysis of the projects, but no more detailed pre-project impact appraisals are available.
SUMMARY OF RECOMMENDATIONS

GENERAL RECOMMENDATIONS:

- The Joint Funds Unit (JFU) is currently publishing top-level data about the CSSF and Prosperity Fund programmes to the IATI registry, while spending departments are publishing more granular data about the individual programme components they are implementing. The departments and the JFU should work together to coordinate a standard approach establishing what information is published by whom and to link the corresponding activities on the registry. This will facilitate traceability of funding streams and allow easier access to a more complete picture of the programmes.

- The CSSF and Prosperity Fund should look to publish overarching strategies to explain the approach and aims of their activities.

- Both funds should publish full tender details for each programme and the corresponding contracts, with security and commercial sensitivity exceptions or redactions where necessary.

CSSF:

- We recommend that the CSSF publishes its programme documents where possible, including:
  - Programme theories of change and results frameworks
  - Contracts with MEL suppliers.
  - Independent evaluations of thematic areas and programmes
  - Human rights risk assessments of programmes
  - Gender audits of CSSF programmes

- We encourage the CSSF to publish the full programme reports and annual reviews that its summaries are extracted from.

- In order to help those monitoring the activities of the CSSF, we encourage the publication of the NSC strategies that set out the objectives the CSSF is working towards.

PROSPERITY FUND:

- We encourage the Prosperity Fund to publish its MREL and results frameworks to demonstrate the intended results and rationales behind the fund’s interventions.

- We also encourage publication of results against the Prosperity Fund’s aggregated portfolio indicators.

- The Prosperity Fund should look to publish the business cases for all of its programmes.

- The Prosperity Fund should publish human rights impact assessments for programmes that are operating in post-conflict or conflict affected areas.

- Where the fund is supporting the construction of infrastructure, pre-project environmental impact assessments should be made available.

- Where business cases have identified the need for vulnerable groups to be involved in the design of projects, details of who was consulted and the results of these consultations should be made accessible.
Acronyms

AIIB  Asian Infrastructure Investment Bank
ASEAN  Association of Southeast Asian Nations
BEIS  Department for Business, Energy and Industrial Strategy
CSSF  Conflict, Stability and Security Fund
DCMS  Department of Digital, Culture, Media and Sport
DEFRA  Department for Environment, Food and Rural Affairs
DFE  Department for Education
DFID  Department for International Development
DHSC  Department of Health and Social Care
DWP  Department for Work and Pensions
FCO  Foreign and Commonwealth Office
FCTC  Framework Convention on Tobacco Control
HMT  Treasury / Her Majesty’s Treasury
IATI  International Aid Transparency Initiative
ICAI  Independent Commission for Aid Impact
IDC  International Development Committee
JCNSS  Joint Committee on the National Security Strategy
JFU  Joint Funds Unit
LMICs  low- and middle-income countries
MEL  monitoring, evaluation and learning
MOD  Ministry of Defence
MREL  monitoring, results, evaluation and learning
NSC  National Security Council
ODA  Official development assistance
SDGs  Sustainable Development Goals