Bringing the goals home
Implementing the SDGs in the UK
1. Introduction and summary recommendations

1.1 This paper sets out a range of options for UK cross government implementation of the Sustainable Development Agenda. It explores options for monitoring progress and promoting accountability, with the aim of generating a discussion on what comes next now the framework is agreed.

1.2 The SDGs will require a fundamentally different approach to sustainable development from the UK government. Unlike their predecessors, the Millennium Development Goals, the Sustainable Development Goals (SDGs) are universal in nature, meaning that all countries and not just developing ones are committed to their implementation. The vision for the SDGs is that they will be transformational.

1.3 The UK’s contribution is not therefore confined to the work of the Department for International Development (DFID), vital though that is to the achievement of the goals at a global level. The UK’s implementation of the SDGs requires action across the three strands: a) delivering the SDGs domestically in the UK for all UK citizens, b) ensuring DFID, in its programming and policy, support the delivery of the SDGs in its priority countries, c) ensuring that domestic action on the SDGs has a positive impact globally.

1.4 The SDGs define sustainable development broadly to cover issues such as poverty, inequality, gender equality, health, education, and governance as well as the more ‘traditional’ sustainable development topics, such as climate change and environmental protection. This means that many different parts of government will need to be involved and coordinated to deliver against them. While the UK’s Sustainable Development Strategies and indicators have generally taken a broad approach, there is currently no strategy that details the responsibilities of different departments and no reference to international commitments in the current sustainable development indicators.

1.5 The UN Summit Outcome Document, Transforming Our World: the 2030 Agenda for Sustainable Development calls on all member states to develop national strategies on the SDGs as soon as possible and to “conduct regular and inclusive reviews of progress at the national and sub-national levels”. It says such reviews should draw on contributions from a wide range of stakeholders, with national parliaments supporting these processes alongside other institutions.

1.6 The UK must develop an own national strategy for the implementation of the SDGs, relevant elements of the Addis Ababa Action Agenda and, in due course, the outcome of the UN Framework Convention Climate Change negotiations in Paris in December. The Bond Beyond 2015 UK Group¹ would like to see the development of a standalone national sustainable development strategy in response to the new goals, covering all three strands outlined above. This should be developed through a participatory and inclusive process resulting in meaningful measurable commitments and with the engagement of decentralised administrations and local governments. Beyond 2015 also wants to see participatory and inclusive monitoring and review mechanisms and scrutiny from a multi-party parliamentary committee.

1.7 As a country that has played a leading role in the post-2015 discussions, not least through the Prime Minister’s co-chairing of the High Level Panel, the UK government has the opportunity to lead the way in SDG implementation and be a model for other countries to follow. While parts of the post-2015 process are incomplete, it is not too early for the UK to be planning its response.

¹ The Bond Beyond 2015 UK group provides a platform for Bond members and other UK NGOs active on the SDGs to work together to ensure the UK plays a leading role in securing a legitimate, overarching and cross-thematic framework for development after 2015. It has over 100 member organisations and an elected steering committee, responsible for leading the work of the group and keeping it focused and effective.
We make a number of recommendations on how to do this that are given in full in the main body of this report. In summary we suggest:

• As soon as practical, the Prime Minister should outline a clear strategy on how the UK government will implement the SDGs based on a detailed review of what is required of the UK to achieve each goal and target. The review should identify department leads for each goal and relevant existing data sets and indicators.

• Reflecting its commitment to Open Government, the development of the strategy should involve an inclusive participatory process, mirroring the ‘national conversations’ that have taken place or are planned in, for example, Germany, Scotland and Wales and those that the government conducts for the development of its national action plan under the Open Government Partnership.

• The Treasury should use the mapping of existing policies, targets and indicators against the SDGs that it is currently conducting with the Cabinet Office to ensure that the Comprehensive Spending Review CSR takes account of what might be required to implement the SDGs. Steps should be taken to make sure there is a strong link between the government’s SDG strategy and future CSRs and budgets.

• Leadership at the highest level is needed to compel all government departments to take a coherent approach to the SDGs. This leadership should come from the Prime Minister and Cabinet Office and an Implementation Task Force on the SDGs should be created to drive forward cross-departmental delivery.

• The Minister for Government Policy in the Cabinet Office should take day-to-day responsibility on sustainable development, reflecting their role in policy coordination.

• A national level body, similar to the Sustainable Development Council in Germany, should be created with a membership drawn from academia, business and civil society to independently review progress against the UK’s SDG strategy.

• A cross-party SDG/sustainable development select committee bringing together chairs or representatives of all the key select committees should also be created to promote parliamentary scrutiny across departmental boundaries.

• Drawing on its approach to the Open Government Partnership, the UK government should support the development of a network on sustainable development similar to the Open Government Civil Society Network, to cooperate on reviewing the UK’s progress against the SDGs/national indicators and the development of new strategies.
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2. Embedding the SDGs in UK policy and planning

2.1 The SDGs cover a wide range of issues, from poverty, gender equality, maternal and child mortality to governance, climate change and energy policy. Some of the global targets, such as target 1.1 on the number of people living on less than a $1.25 a day, are not relevant to the UK domestic context though they will be the focus on the UK’s international development efforts. However, many of the targets do, to some extent, apply to the UK.

2.2 The Stakeholder Forum for a Sustainable Future has looked across the goals and targets and identified those that will be most challenging for developed countries, using the UK as a proxy. It asked three expert assessors to score the goals and targets against the criteria of applicability, implementability, and the transformational impact both in the country concerned and for the world as a whole. The goals and targets around climate change, access to affordable, reliable, sustainable and modern energy for all, sustainable production and consumption and inequality received the highest scores against these criteria.

2.3 Sustainable development and the holistic vision put forward by the SDGs requires a unified vision to how various government departments, functions and initiatives will work together – alongside the private and voluntary sectors – to achieve a coherent approach. That coherence needs to operate across the three strands to SDG implementation in the UK: a) delivering the SDGs domestically in the UK for all UK citizens, b) ensuring DFID, in its programming and policy, support the delivery of the SDGs in its priority countries, c) ensuring that domestic action on the SDGs has a positive impact globally.

2.4 The domestic and international are therefore interlinked: achievement of the SDGs, particularly those around, for example, sustainable consumption and production and climate change, will require all countries to take domestic action. In terms of the UK’s international contribution, the government’s existing strategies will need to be examined and adjusted against the SDGs, the Addis Ababa Action Agenda and past and future UN Framework Convention on Climate Change (UNFCCC) commitments. The UK’s international contribution to the achievement of the SDGs will not just be DFID’s responsibility. It will also depend on wider policies on, for example, tax, transparency, energy and consumption, as well as the efforts of the Foreign Office and Ministry of Defence. Successful delivery will require coherence within and across these three strands.

2.5 Box 1 provides an overview of the current UK policy framework for sustainable development. The UK-wide strategies have tended in the past to take a fairly broad approach to sustainable development, going beyond the traditional definition – as do the current sustainable development indicators. However, in contrast to the 2005 Sustainable Development Strategy, the current indicators do not include international commitments or assign responsibilities to individual departments for their delivery.
Box 1: Sustainable development policy and planning in the UK

UK-wide

From 1994-2010, the UK government had a series of cross-departmental sustainable development strategies setting out a range of indicators for each government department. The strategies covered a wide range of areas such as health, education, road safety, homelessness and well-being as well as environmental and economic measures and included international commitments.

Following the 2010 election, sustainable development was ‘mainstreamed’: there is no longer a standalone strategy but a set of 35 indicators that were developed by the Department for Environment, Food and Rural Affairs (DEFRA) in 2012 and are reported upon annually by the Office of National Statistics. The Sustainable Development Commission (SDC), which was responsible for monitoring progress and advising the government on sustainable development, was abolished in 2010.

Devolved administrations

The current indicators cover the whole of the UK, as did the early strategies and the SDC. However, sustainable development is a devolved matter, meaning there are additional policies and processes in place in Scotland, Wales and Northern Ireland:

- The Government of Wales Act that created the devolved administration places a duty on the Welsh government to promote sustainable development. The 2015 Well-being of Future Generations Act places a duty on public bodies to pursue a sustainable approach and to work together to achieve that end. The consultation process that informed the legislation was entitled the Wales We Want, deliberately echoing the World We Want consultation process for the SDGs. The Act creates a Future Generations Commissioner responsible for reviewing progress and Public Service Boards that are responsible for implementing the Act in local authority areas. The Welsh government has also launched the Sustainable Development Charter, asking organisations from across sectors to commit to sustainable development goals.

- The Scottish government has not updated its sustainable development strategy, Choosing our future: Scotland’s sustainable development strategy, since 2005. However, the National Economic Strategy, developed in 2007 and subsequently updated in 2011 and 2015, commits the Scottish government to sustainable economic growth and the National Performance Framework provides indicators measuring this across a range of areas. Most recently, the Scottish government has launched the Fairer Scotland Conversation, a national consultation that First Minister Nicola Sturgeon has explicitly linked to the Scottish government’s commitment to the SDGs.

- The Northern Ireland (Miscellaneous Provisions) Act 2006 placed a duty on all public authorities to “act in a way it considers best calculated to contribute to the achievement of sustainable development in Northern Ireland”. Northern Ireland’s Sustainable Development Strategy was published in 2010 and covers economic prosperity, social cohesion, environmental protection and meeting national and international responsibilities. The lead on sustainable development lies with the Office of the First Minister and Deputy First Minister.

Local government

The 2000 Local Government Act requires local authorities to prepare a “Community Strategy” outlining how they will promote or improve the economic, social and environmental well-being of their area and contribute to the achievement of sustainable development in the UK. The Localism Act also refers to sustainable development with reference to planning.
The development of the UK’s national SDG strategy

2.6 A few other developed countries are already planning their response to the SDGs. Box 2 outlines the approach the Federal Government of Germany is taking. A number of other countries, such as France, Ireland, Hungary and Finland, are also starting to look at what the SDGs could mean for them, as are the EU institutions.

Box 2: Germany’s plans for implementation of the SDGs

The Federal Government of Germany has a number of structures in place to promote action on sustainable development across government.

- The State Secretaries’ Committee on Sustainable Development is a high level committee composed of all ministries’ State Secretaries. Its secretariat is in the Chancellery. This committee is responsible for ensuring that sustainable development is a guiding principle of any policy of the German government. It is responsible for monitoring progress against the National Sustainable Development Strategy and conducting any preparatory work to update the strategy, which is then approved by the Federal Cabinet. Individual ministries also provide reports to the Committee.

- The Chief Minister in the Chancellery/Minister of Special Affairs chairs the State Secretaries Committee and is responsible for sustainable development. There are sustainability directors in each of the ministries.

- The Sustainable Development Council, made up of senior figures from science, business and civil society appointed by the Chancellor, advises the government on sustainable development and monitors progress against the national strategy.

- The Parliamentary Advisory Council on Sustainable Development within the German Parliament, the Bundestag, monitors and supports the implementation of the Federal Government’s National Sustainable Development Strategy and evaluates the sustainability impact assessments of laws and policies. Such assessments are required before they are considered by the cabinet.

The German government began consulting informally on what the SDGs could mean for Germany towards the end of 2014, using the Open Working Group’s proposed goals and targets. The Council on Sustainable Development published a position paper in June 2015 after which there have been further ad hoc consultations. The Chancellery has also asked ministries to assess what will be required for Germany to implement the SDGs.

The Federal Government is planning to launch a formal national consultation in autumn 2015 that will feed into a revision of its existing National Sustainable Development Strategy. This will consist of five big dialogue events in different parts of Germany, starting at the end of October. The Federal Government will publish its implementation plan early in summer 2016.
2.7 The UK’s response to the SDGs requires a single guiding statement of intent, a unified strategy, that brings together the domestic and international, makes clear how the government will collectively deliver against the SDGs and also identifies individual departmental responsibilities.

2.8 A clear statement and strategy is needed to identify key areas for action, promote coherence and enable accountability by setting clear objectives necessary for effective monitoring and accountability (see section 4 below). While mainstreaming may be part of the strategy, mainstreaming alone will not promote coherence and often means that issues become buried, making it difficult for external actors to track progress.

2.9 The UK’s institutional arrangements around sustainable development are examined in further detail below, but to ensure that the whole of government responds in the manner required, this statement should come from the Prime Minister, demonstrating his ongoing personal commitment to the SDGs. This strategy should reflect a whole of government response, bringing together the domestic with the international, which may be backed up by individual departmental plans.

2.10 As recognised in the Outcome Document, the UK’s SDG strategy will need to take into account policies, targets and commitments already in place across the wide range of areas covered by the goals and targets. We understand that some form of mapping, led by the Cabinet Office and the Treasury, of existing government policies and targets against the SDGs is currently underway. This is currently an internal process. Beyond 2015 calls for SDG strategies to be developed in a participatory and inclusive manner. The 2012 Civil Service Reform Plan also commits the government to open policy making as “default” and the UK’s 2013-2015 National Plan under the Open Government Partnership commits the government to finding ways to increase public engagement in policy making. As outlined in boxes 1 and 2, the German government and the Welsh and Scottish governments have taken a consultative approach to responding to the SDGs.

2.11 In its approach to the SDGs, the government may wish to replicate the national planning process that it undertakes to develop its biennial National Transparency Plan under the Open Government Partnership. These plans identify the steps that will be taken to improve openness and transparency. They are developed in consultation with the Open Government Civil Society Network, a network of 450 organisations led by a small steering group, coordinated by Involve and funded by the Omidyar Network, and through a series of meetings around the country. The Civil Society Network is also involved in the mid-term review of the plans, and provides an ongoing forum for organisations with an interest in open and transparent government to engage in discussions around the UK Government’s performance in this area.

2.12 The strategy should identify key areas where the UK needs to make progress, domestically and internationally, and should set national targets for the duration of the strategy. These targets should, where necessary, identify the stepping stones towards the achievement of the SDGs over the 15 year period. In constructing this strategy, it is essential that the government aims for coherence within and across the three strands identified above, and that the process for developing and implementing the strategy addresses areas where policy and/or practice contradicts the SDGs.


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Resourcing implementation of the SDGs

2.13 Implementing the SDGs has budgetary implications across the domestic and international agenda, going well beyond the aid budget. The Addis Ababa conference called upon developed countries to fulfill their commitments on aid, tax and climate financing, but implementation of the SDGs domestically will also require additional resources, matched to the Government’s SDG strategy. In austere times, it should be remembered that sustainable development and greater coherence across departments creates the potential to make considerable savings. For example, the Sustainable Development Commission estimated that between 2005 and 2010, steps to improve sustainability had saved £60-70 million annually.5

2.14 The results of the next Comprehensive Spending Review will be announced in late November and the process is already well advanced. On this timescale, it may not be possible to fully match spending plans with the government’s SDG implementation plans, but the current mapping process could be used to ensure that the CSR takes some account of what might be required to implement the SDGs. Steps also need to be taken to link future CSRs and budgets and SDG implementation plans, to enable future governments to allocate the longer term resources necessary to make progress against commitments made.

2.15 The Environmental Audit Committee’s 2015 inquiry into the government’s approach to sustainable development will look at the linkages between fiscal and sustainable development agenda.

Recommendations

• As soon as practical, the Prime Minister should outline a clear strategy on the approach the UK government will take to implementing the SDGs. This should reflect the breadth of the SDG agenda and articulate how the government will take coherent and integrated action across the three strands of its response outlined above. That strategy will need to clarify the role of devolved administrations and link to their strategies, as appropriate. There should be annual reports and statements to parliament on progress against this strategy, and regular points at which it should be fully reviewed and updated every five years. While some parts of the post-2015 process are still to be settled, the government should be starting the process of planning its response, which will take some time, in earnest now.

• That strategy should be based on a detailed assessment of what is required of the UK to achieve each goal and target and should identify department leads for each goal. The process should identify existing data sets and indicators and lead to the creation of new Sustainable Development Indicators to measure progress. This review will also need to identify where existing policies may undermine progress against the SDGs. A strategy should be developed for each goal.

• Reflecting its commitment to Open Government, the development of the strategy should involve an inclusive participatory process, mirroring the ‘national conversations’ that have taken place or are planned in Germany, Scotland and Wales and those that the government conducts for the development of its national action plan under the Open Government Partnership.

• The Treasury should use the current mapping of existing policies, targets and indicators against the SDGs to ensure that the CSR takes account of what might be required to implement them.

• Future budgets should reflect the detailed requirements arising from the commitments made in the UK’s SDG strategy and steps should also be taken to link the timelines of future CSRs with reviews of the SDG strategy.

3. Cross-governmental coordination

3.1 Ensuring effective delivery of the UK’s national response to the SDGs requires high level leadership at the centre of government. Sustainable development by its very nature requires coordination and processes for making decisions that promote synergies and address competing priorities to produce a more sustainable outcome.

3.2 The Department for Environment, Food and Rural Affairs (DEFRA), led the development of past sustainable development strategies and the current sustainable development indicators. As the Environmental Audit Committee has pointed out in its reports on Embedding Sustainable Development in Government in the last parliament, DEFRA has not got the power to compel other departments to take the action needed to truly embed sustainable development across government. Giving DEFRA future responsibility for sustainable development strategies or indicators would also imply that it is primarily an environmental issue, though the UK government’s own indicators and the devolved administrations’ strategies as well as the SDGs recognise that it is much broader than that.

3.3 The Environmental Audit Committee (EAC) recommended that the Prime Minister and Cabinet Office take the lead on sustainable development with the Treasury playing an increased role. It recommended that there be a Minister for Sustainable Development in the Cabinet Office. WWF has also suggested the creation of a Cabinet level Chief Secretary for Sustainability in the Treasury.

3.4 The Institute for Government (IFG) has found that giving influential and motivated ministers who report to the Prime Minister, responsibility for specific agenda can be key to addressing complex policy challenges. However, they also need access to resources in the form of funding, specialist advisers and other staff. There are also other means of promoting coordination, such as Cabinet Committees and other inter-ministerial groupings as well as joint funds and delivery units. The Coalition Government created a number of new cross-Whitehall mechanisms, such as the National Security Council and the Ministerial Group on Social Mobility, and bolstered others. For example, it has increased funding to the cross-departmental Conflict Security and Stability Fund. The Prime Minister has also reinforced the role of Cabinet Committees since his election in 2010. Since his reelection in 2015, he has introduced around a dozen new implementation task forces to drive forward cross-governmental action on key issues, chairing those on immigration and extremism himself. There is, however, currently no mechanism that cuts across the range of issues covered by the SDGs.

3.5 This and the following section contain a number of suggestions for possible mechanisms for promoting coordination and effective monitoring and accountability. These are for discussion. Mechanisms should not be seen as an end in themselves and this paper is not necessarily proposing that all of the suggestions be taken forward. However, the suggested mechanisms address a range of issues associated with ensuring a coherent approach and promoting accountability.

Recommendations

- As outlined above, the UK’s strategy for the SDGs should aim for a coherent approach within and across the three strands of its response to goals and targets.

- Leadership on sustainable development and the SDGs should come from the Prime Minister, and the Cabinet Office should be responsible for co-ordinating action for sustainable development across government, with the Treasury also taking a leading role.

- The Prime Minister should create and chair an Implementation Task Force on the SDGs and include Secretaries of State from all departments to take forward the development of a national action plan and oversee delivery across government.

- A Cabinet-level minister, preferably the Minister for Government Policy in the Cabinet Office, should take day-to-day responsibility for sustainable development, reflecting that Minister’s role in policy coordination. A junior minister for sustainable development could also be appointed to support this role, alongside the necessary staff and resources.


4. Options for monitoring and accountability for progress against the framework

4.1 The outcome document calls on member states to "conduct regular and inclusive reviews of progress at the national and sub-national levels which are country-led and country-driven. Such reviews should draw on contributions from civil society, the private sector, indigenous peoples and other stakeholders, in line with national circumstances, policies and priorities. National parliaments as well as other institutions can also support these processes." Bond Beyond 2015 UK calls for participatory and inclusive monitoring and review mechanisms, and scrutiny from multi-party parliamentary committees.

4.2 The IFG identifies the requirements for good scrutiny and accountability as:

- Clear objectives.
- Clarity on responsibility for delivery of those objectives.
- Effective feedback mechanisms to understand progress on objectives.
- Good measurement with reliable, independent data.
- Arrangements to ensure that those responsible are held to account for performance.

4.3 At present, the Office of National Statistics publishes annual reports on the sustainable development indicators, and it is probable that it would be responsible for publishing any data on the UK’s performance against national indicators linked to the SDGs.

4.4 The House of Commons Environmental Audit Committee is responsible for scrutinising the government’s performance on sustainable development and in so doing they take evidence from other actors, including civil society. The National Audit Office also has a role as the watchdog on public spending, providing briefings for the EAC on, for example, government departments’ performance in improving the sustainability of their own operations. This is the extent of the UK wide infrastructure for monitoring and reviewing the government’s current sustainable development indicators. Though other bodies, such as the Committee on Climate Change, Natural Capital Committee, Social Mobility Commission and the Office of Budget Responsibility have responsibility for monitoring broader progress on individual elements of the agenda. When the SDC closed, the then SDC Commissioner for Wales continued as the Commissioner for Sustainable Futures, a role that will evolve into the Commissioner for Future Generations. The Scottish government states that its performance against its National Economic Strategy is monitored by the Scottish parliament, Audit Office and the Committee on Climate Change.

4.5 Prior to 2010, the SDC’s remit was to act as a watchdog and adviser for the government’s efforts on sustainable development, reviewing the UK government’s and devolved administrations’ performance against the Sustainable Development Strategy and other policies. The SDC benefitted from a degree of closeness to government, working with individual government departments and reporting to the Prime Minister and First Ministers, but with an independent perspective provided by its Commissioners who were drawn from civil society, academia and business. On the negative side, the SDC’s reporting line into DEFRA implied a narrow view of sustainable development.

4.6 After the 2010 Coalition government announced its decision to cease funding to the SDC in 2010, the Environment Secretary said she hoped the EAC would take on the SDC’s watchdog function.

4.7 Parliament’s role in scrutinising performance is a central element of any accountability framework. The EAC is generally recognised to be playing an effective role, but it has itself questioned the extent to which it can fulfil a watchdog role, stating in its 2011 report on Embedding Sustainable Development in Government (paragraph 64) that:

“There is a distinction to be drawn between scrutiny that assists government either to encourage better performance or to bring further transparency to its operations — and scrutiny that aids accountability to Parliament. The SDC’s scrutiny work supports mainly the first type, although it also provides useful material for the second type. There is also a distinction between scrutinising government at arm’s length from the ‘outside’, as we are able to do, and scrutinising government from within, as the SDC has been able to do by embedding staff within departments.”

Since the EAC is itself primarily focused on the environment, it is also questionable whether it can have the breadth of perspective required to comprehensively scrutinise the whole SDG agenda. As the IFG says, “The departmental organisation of select committees makes them singularly bad at holding government to account for its performance on cross-cutting issues. Rather, the select committees tend to reinforce departmental silos.” Joint committees are sometimes used to, for example, scrutinise arms exports (a joint committee taking members from the Foreign, Defence and International Select Committees) and national security. The Liaison Committee brings together the chairs of all the Select Committees and the chair of the Joint Committee on Human Rights.

In conclusion, beyond parliament, there is no existing body at a UK level that is in a position to lead an inclusive and participatory review of the UK government’s performance against the SDGs.

WWF has proposed an Office of Environmental Responsibility, deriving its title from the Office for Budget Responsibility created by this government. Other models may be the Committee on Climate Change or the Social Mobility and Child Poverty Commission, which was created by the Coalition government to promote coherence and accountability in that policy area, staffed by Commissioners from business, civil society and academia. Another could be the German Sustainable Development Council described in Box 2 above. Both play a role in independently monitoring progress and providing advice in their respective areas, publishing independent reports and pulling in external actors via their commissioners and committee members.

Parliamentary scrutiny needs to go beyond the EAC to include more of the relevant committees.

Recommendations

• Create a national level body, similar to the Sustainable Development Council in Germany, with a membership drawn from academia, business and civil society that is responsible for independently reviewing progress against the UK’s SDG strategy.

• Create a cross-party SDG/sustainable development select committee bringing together chairs or representatives of all the key select committees, including health, education, EAC, energy and climate change, international development, defence, foreign affairs, home affairs, justice, and women and equality. An alternative approach might be to give responsibility for scrutinising the government on its overall approach to the SDGs to the Liaison Committee, but steps would need to be taken to ensure that the Committee could give the matter sufficient levels of scrutiny and would therefore need to be linked to the creation of other mechanisms, such as the national level body in the previous recommendations, which could provide that in-depth analysis.

• Drawing on its approach to the Open Government Partnership, the UK government could support the development of a recognised multi-stakeholder network, similar to the Open Government Civil Society Network, with which it cooperates on reviewing the UK’s progress against the SDGs/ national indicators. This would need a budget to enable the network to organise itself and produce shadow reports outlining civil society’s assessment of progress to complement those of the government and any independent body.
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