

Independent Reporting Mechanism

Results Report:
United Kingdom 2023-2025

Open
Government
Partnership



Independent
Reporting
Mechanism

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Executive Summary

The United Kingdom (UK)'s sixth national OGP action plan produced substantial early results in public procurement transparency through the implementation of the 2023 Procurement Act. The action plan also led to improvements in the availability and usability of international aid data. Collaboration between government and civil society continued to be strong throughout the implementation period despite institutional disruptions following the General Election in July 2024.

Implementation

The UK's sixth national action plan (NAP6) included four commitments which were all fully or substantially completed during the implementation period.

Commitment 1 successfully built on earlier UK commitments to advance transparency in public procurement through the implementation of the Procurement Act 2023, which entered into force in February 2025. This commitment resulted in a new central platform for publishing procurement information across the contracting lifecycle and increased the volume and improved the structure of procurement data. It also led to new notice requirements that improve the visibility of contracting opportunities and oversight of government spending. Commitment 2 improved the quality, completeness, and regularity of UK international aid data reporting. More departments now publish aid data in standardised formats. These efforts contributed to improvements in the UK's performance in the 2024 Aid Transparency Index and strengthened internal monitoring of aid data quality.

Commitments 3 and 4 helped to formalise civil society involvement in the UK's domestic and international anti-corruption efforts, such as the UK Anticorruption Strategy (ACS) and in the UK's involvement in the United Nations Convention against Corruption processes. Civil society was actively engaged in anti-corruption processes during NAP6, particularly in developing and launching the ACS.

Participation and Co-Creation

Civil society and government representatives acknowledged that the co-creation process for NAP6 was an improvement compared to the previous action plan (2021-2023). The scope of NAP6 was limited to four commitments that would be feasible to implement during the two-year implementation period. Government and civil society representatives attributed the lack of broader outreach primarily to resource constraints, insufficient time under OGP's action plan delivery windows, as well as the resourcing and capacity limitations of the UK Open Government Civil Society Network.

Responsibility for coordinating the OGP process transitioned to the Civil Service Strategy Unit (CSSU) within the Cabinet Office in April 2025, while the government Point of Contact remained

At a Glance

LEVEL OF COMPLETION

4/4

Complete or substantially complete commitments

EARLY RESULTS

3/4

Commitments with early results

1/4

Commitments with significant results

KEY OBSERVATIONS

- NAP6 produced better quality data on public procurement and international aid, but wider uptake of this data will require more time.
- Civil society was active in shaping the UK's anti-corruption processes, particularly the Anti-Corruption Strategy.
- Government and civil society continued to collaborate during the implementation period despite institutional disruption following the general election.
- OGP commitments and open government reforms are progressing across action plans, but these are perceived as fragmented.

Met the minimum requirements during implementation: Yes

unchanged. Following the General Election in July 2024, there were institutional changes which resulted in the Multi-Stakeholder Forum (MSF) not meeting again until December 2025.¹ However, engagement continued at the level of individual commitments, where civil society organisations and policy leads met in advisory groups, thematic networks, and through direct collaboration.² This approach helped sustain implementation-level collaboration, but the absence of MSF meetings during this period reduced opportunities for cross-commitment learning and broader strategic dialogue.

Implementation in Context

Implementation of NAP6 took place during a period of significant institutional change. Following the 2024 general election, the change in government led to the transfer of OGP coordination responsibilities from the Central Digital and Data Office (CDDO) ultimately to the CSSU within the Cabinet Office. This transition created internal coordination and capacity challenges that contributed to the MSF being paused for 17 months, reflecting broader difficulties in re-establishing coordination under the new arrangement. The CDDO, together with the Government Digital Service, was moved to the Department for Science, Innovation and Technology as part of a machinery of government change. In the months that followed, it was agreed for the OGP remit to be returned to a suitable business unit within the Cabinet Office. Throughout this period, there was no designated ministerial lead for open government, which was deemed essential to restarting the MSF meetings due to the change of government.

At the same time, several developments during NAP6 helped institutionalise open government principles in the UK in the future. These include the development of the Civil Society Covenant in July 2025 which provides a set of principles to help build effective partnerships across civil society and government, as well as the introduction of the Public Office (Accountability) Bill to Parliament in September 2025 which will introduce a legal duty for public servants to act with candour and transparency and criminal sanctions for egregious breaches.³ Additionally, the UK Government was elected to serve as co-chair of OGP for the period of October 2026 to September 2027, which could bring high-level political support for the open government agenda in the UK.

¹ Matthew Donnelly and Ben Gittins (Cabinet Office), interview by the IRM, 2 March 2026.

² Kevin Keith (UK OGN Chair), interview by the IRM, 9 March 2026.

³ GOV.UK, "Hillsborough Law to ensure truth never concealed by state again," press release, 15 September 2025, <https://www.gov.uk/government/news/hillsborough-law-to-ensure-truth-never-concealed-by-state-again>.

Section I. Key Observations

The key observations below offer reflections from the UK's sixth action plan cycle. These lessons aim to support the UK's future action plans and broader open government journey.

Observation 1: NAP6 produced better quality data on public procurement and international aid, but wider uptake of this data will require more time.

Commitments 1 (public procurement) and 2 (aid transparency) improved the volume, structure, and availability of data. For Commitment 1, the Procurement Act 2023 provided the legislative basis for a redesigned procurement transparency regime, including a central platform, standardised notice requirements, and compliance oversight. These changes significantly increased the amount of procurement information published across the contracting lifecycle. Additionally, as part of the Open Gov Challenge, the Cabinet Office is compiling public procurement data collected through the central platform into publicly available dashboards and search tools, allowing the public and government oversight bodies to monitor contracts across the procurement cycle. However, there is still a need to increase awareness among small and medium size enterprises (SMEs) of the new procurement platform, as many still find procurement opportunities indirectly through fragmented supply chains and private portals.

Commitment 2 improved the completeness, regularity, and standardisation of UK aid data, returning the UK as a top performer in international transparency. This commitment relied on automated data quality checks and internal dashboards, resulting in more complete data rather than usability or accountability. In aid transparency, improvements in backend data have yet to translate into higher data use by civil society, researchers, or oversight bodies (such as parliamentary committees, audit institutions, and accountability organisations) responsible for scrutinising how aid funds are spent. Realising the full benefits of these reforms will depend on improving how data is communicated to different users, and on developing tools and guidance that enable more effective use of available information.

Observation 2: Civil society was active in shaping the UK's anti-corruption processes, particularly the Anti-Corruption Strategy.

Commitments 3 and 4 centered on stakeholder dialogue and participation in the UK's domestic and international anti-corruption efforts, including the United Nations Convention Against Corruption (UNCAC) and the UK anti-corruption strategy 2025 (ACS). These commitments largely succeeded in involving UK civil society in anti-corruption processes. For Commitment 3, civil society organisations coordinated through the UK Anti-Corruption Coalition (UKACC) were actively engaged in the development and launch of the ACS. Civil society was given a prominent role at the launch event for the strategy. Subsequently the PM's anti-corruption champion has convened an External Engagement Group with civil society representatives, MPs, and others to support monitoring and implementation of the strategy. In the case of Commitment 4, civil society was active in the UNCAC process, but the externally determined timelines of the UNCAC review mechanism did not coincide with the OGP NAP cycle.

Observation 3: Government and civil society continued to collaborate during the implementation period despite institutional disruption following the general election.

Following the general election in July 2024, the UK's OGP process lacked a dedicated ministerial lead. The Multi-Stakeholder Forum (MSF) did not meet again until December 2025, as the designation of a responsible minister was considered to be a prerequisite for reconvening the MSF following the change of government. This reduced structured dialogue between government and civil society around the progress of NAP6 during much of the implementation period. However, implementation of commitments continued largely uninterrupted, sustained by policy leads. Oversight was sustained through commitment-level advisory groups and thematic networks. While commitment implementation was resilient to disruptions in central coordination, cross-commitment learning and monitoring, and the ability of stakeholders to maintain a shared understanding of priorities across the full action plan depends heavily on a functioning MSF. The

experience of NAP6 underlines the importance of securing political leadership to ensure the legitimacy of the MSF or having other more informal versions of the MSF that can meet in the meantime to continue the cross-departmental engagement.

Observation 4: OGP commitments and open government reforms are progressing across action plans, but these are perceived as fragmented.

Several advancements under NAP6 built directly on earlier OGP commitments around open contracting and aid transparency. Broader initiatives including the Civil Society Covenant (aimed at resetting the relationship between the UK Government and civil society), proposed public authority accountability legislation, and the UK's upcoming co-chairmanship of OGP (October 2026 to September 2027) also reflect strong institutional momentum on open government. However, civil society stakeholders noted that the absence of a clear, overarching narrative makes it difficult to communicate cumulative progress or link reforms across policy areas. As a result, advances in transparency, participation, and accountability appear fragmented rather than part of a coherent trajectory. Integrating these initiatives within a unified open government agenda could support cross-government alignment and make the UK's reform efforts more visible to domestic and external stakeholders. The upcoming co-chairing of OGP could be an opportunity to define a clear vision for open government in the UK over the long-term.

Section II. Early Results

This section analyses commitments that achieved the strongest early results in the action plan. To assess early results, the IRM considers commitments’ objective, the country context, the policy area, and the evidence of changes. The IRM early results assessment is determined by the depth of change that occurred and evidence that the change is expected to be sustained in time.

Table 1. Commitments with Early Results

Commitment 1: Open Contracting: The commitment laid the foundation for increased access to public procurement information through the enactment of secondary legislation under the Procurement Act 2023, the deployment of a central digital platform, and the publication of guidance to support the new transparency regime.
Commitment 2: Aid Transparency: The commitment improved the availability and quality of UK aid information through stronger performance in the Aid Transparency Index, timely publication of core accountability reports, and continued disclosure of data through IATI and DevTracker.

Commitment 1: Open Contracting

Implementers: Cabinet Office; Open Contracting Advisory Group

Context and Objectives

Public procurement accounts for roughly one third of UK public expenditure, with around £400 billion spent annually on goods and services. Previous OGP action plans improved transparency in public contracting by adopting and expanding the Open Contracting Data Standard (OCDS) and improving procurement data published on the national portal Contracts Finder. The current commitment aimed to support implementation of the Procurement Act 2023,¹ which replaced the previous EU procurement regime. The Act expanded requirements to publish procurement information in open, structured formats and introduced a central digital platform with supplier registration functionality. The commitment also included developing secondary legislation, guidance, and training to support implementation and strengthen transparency, supplier participation, and access to procurement data for civil society and businesses.

Early Results: Significant Results

The IRM assessed the early results from this commitment as significant because implementation has moved beyond legislative preparation to the operational rollout of the new transparency framework for public procurement. The Procurement Act 2023 and accompanying secondary legislation have now entered into force, supported by the launch of a central digital platform for procurement notices, training for contracting authorities and suppliers, and the establishment of the Procurement Review Unit to oversee compliance with the new regime.² Early implementation shows strong adoption of the new notice-based system and increasing publication of procurement information across the lifecycle. The reforms are also beginning to improve supplier access to opportunities, expand structured procurement data, and support greater analysis and oversight of government spending.

The Procurement Act came into force on 24 February 2025 and was operationalised through the Procurement Regulations 2024, passed in May 2024.³ The reform introduced a “whole-lifecycle notice regime” where contracting authorities are required to publish procurement information at multiple stages of the contracting process, including planning and early market engagement, the launch of tender opportunities, contract award decisions, and subsequent contract modifications or termination during implementation. This creates a continuous public record of procurement activity that was not consistently available under the previous regime. The reforms also consolidated previously fragmented publication systems by enhancing Find a Tender into the central platform for procurement notices, with legislation in place to migrate Contracts Finder’s publication requirements to Find a Tender in the future.⁴

Data from the first year of operation under the Procurement Act suggests a substantial increase in the number of procurement notices published through the central platform. Under the new regime, 88,121 notices were published on Find a Tender between 24 February 2025 and 23 February 2026, more than double the 42,610 published in the equivalent period under the previous regime. However, this should be interpreted with caution, as the new regime consolidates both above and below threshold notices onto a single platform, whereas below-threshold notices were previously published separately on Contracts Finder.⁵ Uptake has been particularly notable for early-stage notices designed to support supplier engagement.⁶ Since the introduction of the Act, the use of pre-market engagement notices (a new feature that enables contracting authorities to signal procurement plans and engage suppliers earlier in the procurement process) has grown substantially. In the first three months of implementation, almost 600 contracting authorities published 1,691 notices, rising from 22 in the final week of February 2025 to an average of over 600 per month since May 2025.⁷ A similar pattern is visible in pre-tender supplier engagement notices, where publication volumes are now 3.5 times higher year-on-year, rising from 3,900 notices in 2024–2025 to 14,400 notices following implementation of the new regime. Planning notices have also increased significantly, rising from 3,900 in 2024–2025 to 8,900 in 2026.⁸ Early uptake of the platform appears substantial: by early 2026, more than 74,000 suppliers and 110,000 users had registered.

In addition, the new regime also introduced notice types designed to strengthen accountability. Direct award transparency notices make the use of non-competitive procurement procedures more visible and contestable,⁹ while procurement termination notices reduce the possibility of “silent cancellations” once a procurement has begun.¹⁰

The consolidation of procurement notices onto a single platform reduces the need for suppliers to search across multiple legacy systems. However, evidence suggests that many SMEs remain unaware that the platform serves as the primary location for procurement notices.¹¹ Survey research conducted among approximately 900 SMEs found that 55 percent were not aware of the new procurement regime, 62 percent report that finding relevant public sector contracts is difficult, with 27 percent describing it as difficult because of inconsistent portals, forms, and rules.¹² Additionally, procurement opportunities continue to be advertised across a broader fragmented landscape of private portals and supply chain platforms outside the central system, which limits the extent to which consolidation has improved visibility for all suppliers.¹³ A representative of the Federation of Small Businesses (FSB) observed that procurement terminology and contract descriptions are still often highly technical, which can make it difficult for businesses without prior procurement experience to identify relevant opportunities.¹⁴

The new framework expands the use of structured and standardised procurement data aligned with open contracting principles, improving the consistency, comparability, and usability of information on public contracts.¹⁵ Publishing procurement data in the OCDS has expanded the system’s underlying data architecture. Open Contracting Partnership (OCP)’s analysis found that 143 new structured data fields have been introduced, bringing the total number of fields to 551 across planning, tender, award, and contract implementation stages.¹⁶

The central digital platform includes a supplier registration service that allows businesses to register once and reuse core company information when submitting bids.¹⁷ This “tell us once” approach reduces the need for suppliers to repeatedly provide the same information across multiple procurements, lowering administrative burdens for businesses participating in public tenders. In addition to simplifying registration and bidding processes, the new regime has removed certain upfront requirements that previously imposed costs on suppliers before contract award, such as evidencing public liability insurance during the bidding stage.¹⁸ However, the administrative burden may persist if suppliers are required to submit similar information across multiple procurement portals.¹⁹ FSB survey evidence suggests that the benefits of the “tell us once” approach have not yet been fully realised in practice, with 35 percent of small firms reporting that they still have to submit the same information repeatedly for each new bid as of July 2025.²⁰

The reforms have introduced new mechanisms to strengthen oversight and accountability within the procurement system. In February 2026, the government launched the Procurement Review Unit (PRU),²¹ which is responsible for overseeing compliance with the new procurement rules and identifying potential systemic or institutional breaches across contracting authorities.²² The PRU is expected to play a role in monitoring procurement practices and responding to concerns raised by suppliers or other stakeholders. Alongside this oversight function, officials have begun analysing procurement data quality and working with contracting authorities to raise awareness of common reporting issues, including errors in contract values or missing identifiers. Officials report that these issues are being addressed through system guardrails, updated guidance, and ongoing engagement with contracting authorities through specialist forums and technical working groups where common reporting issues are discussed.²³

This commitment was also supported by a Learning and Development programme designed to help contracting authorities and suppliers adapt to the new procurement regime. The programme includes knowledge-sharing sessions (“knowledge drops”), guidance materials, and an e-learning course for the new notice regime and transparency requirements. An FSB representative noted that while such materials are generally accessible for organisations already familiar with procurement processes, their impact will depend on whether they reach smaller businesses that lack dedicated procurement expertise. The representative emphasised that participation in these programmes often depends on who is invited or aware of them, and that many small business owners are unlikely to engage with training framed primarily for procurement specialists.²⁴

These early results demonstrate that the commitment has moved decisively from legislative reform to system-level operational change. While downstream outcomes, such as improved competition, increased SME participation, better value for money, or stronger enforcement, cannot yet be assessed, early evidence suggests that the institutional infrastructure and transparency mechanisms necessary to support those outcomes are now in place. The implementation of the new notice regime, the expansion of structured procurement data, and the consolidation of procurement information onto a single digital platform collectively create the conditions for more systematic monitoring of procurement activity and greater scrutiny of how public funds are spent. At the same time, stakeholders indicate that further work is needed to ensure that the benefits of the new system translate into broader supplier participation.

Looking Ahead

Public procurement remains relevant for future action plans, as government and civil society stakeholders ensure that the transparency reforms translate into more inclusive participation and effective oversight of procurement processes. As part of the Open Government Challenge, the Cabinet Office is compiling public procurement data collected through the central platform into publicly available dashboards. This will make it easier to track key metrics such as SME and Voluntary, Community, and Social Enterprise (VCSE) participation and levels of competition, allowing civil society and government oversight bodies to monitor contracts across the procurement cycle.²⁵ This is a direct continuation of the achievements of the commitment in NAP6.

Going forward, the IRM recommends governmental and non-governmental stakeholders consider the following actions to strengthen transparency, accessibility, and accountability in the public procurement system:

- **Increase awareness of the central procurement platform.** Outreach could help ensure that businesses, particularly SMEs and firms not previously engaged in public procurement, are aware of where procurement opportunities are published and how to access them.
- **Reduce fragmentation across procurement information channels.** Continued efforts could help consolidate procurement information within the central digital platform and improve the visibility of opportunities that are currently mediated through private procurement portals or large supplier networks.

- **Improve the accessibility of procurement information.** Procurement notices, guidance materials, and engagement processes could be communicated using clear language to help businesses unfamiliar with public procurement identify relevant opportunities and understand participation requirements.
- **Increase transparency around SME participation in procurement supply chains.** Government could consider encouraging Tier 1 suppliers (large prime contractors delivering major public projects) to set and publish medium-term targets for SME participation and report periodically on progress. Publishing this information could help improve visibility of subcontracting opportunities and allow smaller firms to better understand how they can participate in public procurement supply chains.
- **Improve transparency around procurement outcomes and supplier participation.** Providing clearer explanations to unsuccessful bidders could help suppliers understand procurement decisions and improve future participation, particularly for businesses investing significant time and resources in preparing bids. Greater transparency around SME participation within major government contracts and supply chains could also help improve the visibility of subcontracting opportunities and allow smaller firms to better understand how they can engage in public procurement.
- **Monitor whether transparency reforms translate into improved participation and strengthen oversight of SME participation across government departments.** As implementation progresses, further evaluation could assess whether the new system leads to increased competition, greater SME participation, and improved value for money. Government could also consider improving transparency around SME participation in procurement supply chains and publishing regular updates on progress toward SME participation objectives.

Commitment 2: Aid Transparency

Implementers: FCDO; Bond Transparency Working Group²⁶

Context and Objectives

The commitment aimed to strengthen the transparency, quality, and accessibility of UK Official Development Assistance (ODA) data published across government. This was particularly significant given institutional changes to the UK aid architecture, including the creation of the Foreign, Commonwealth and Development Office (FCDO), which required adjustments to existing transparency and reporting processes. The commitment also responded to concerns that accountability mechanisms such as the Aid Transparency Index primarily assessed FCDO's transparency performance, leaving other departments' aid spending less visible. The commitment focused on maintaining timely publication of aid data through platforms such as International Aid Transparency Initiative (IATI) and DevTracker, improving data quality, and expanding transparency to include British International Investment (BII). It also aimed to facilitate civil society scrutiny of aid spending and incorporate feedback from data users to improve usability.

Early Results: Moderate Results

Overall, the IRM assesses the early results of this commitment as moderate. Twelve of the 14 milestones were completed during the action plan cycle.²⁷ The commitment improved the quality, completeness, and regularity of UK aid data and supported the UK's improved performance in the 2024 Aid Transparency Index. The UK government also demonstrated higher responsiveness to independent transparency assessments, external reviews of aid transparency practices, and feedback from civil society organisations (CSOs). Visible changes in the accessibility and usability of UK aid data remain limited – though further improvements are planned.²⁸ While more departments – including several newer ODA-spending departments – are publishing data in standardised formats, improvements have been more visible in data completeness than in the practical accessibility of aid data for external users.²⁹

The most visible early result was the FCDO's improvement from a "Good" in 2022 to a "Very Good" rating in the 2024 Aid Transparency Index, an independent assessment produced by Publish What You Fund.³⁰ This improvement was significant given concerns that the merger of the Department for International Development and the Foreign and Commonwealth Office had weakened the UK's previously strong aid transparency performance.³¹ In the 2024 Index, the UK was identified as the most improved donor, increasing its overall score by 11 points compared to the previous assessment. The improvement in the UK's score was driven primarily by better disclosure of project-level information and more complete aid data. The FCDO improved in the clarity and availability of activity descriptions and project attributes, which improved the interpretability of UK aid data for external users, although the FCDO continues to perform less strongly on indicators related to performance data.³² More consistent completion of required IATI data fields, improved availability of programme documentation, and sustained monthly publication of aid data contributed to stronger compliance with transparency standards assessed by the Index. Internal monitoring of data quality was also strengthened through automated checks and internal dashboards designed to identify gaps in published datasets.³³ Independent experts noted that the improvement also reflected the strength of the UK's long-standing aid data publishing infrastructure, which predates NAP6, and could not be attributed solely to the specific activities under this commitment.³⁴

The civil society co-chair of the aid transparency thematic group noted that the commitment helped bring transparency back onto the agenda in some departments where publication practices had weakened due to staff turnover or shifting internal priorities. She also emphasised that publishing UK aid data using internationally recognised transparency standards enables its integration into global datasets and facilitates its use for comparative research and thematic analysis across sectors.³⁵ However, many of these improvements relate to internal data management and reporting processes, while the practical usability of aid data for external analysis remains uneven. Independent experts highlighted that while large top-level contracts awarded by the FCDO are typically disclosed, information on how those funds are distributed to subcontractors and implementing partners is often not available in publicly accessible datasets. This makes it difficult for data users to determine where funds ultimately go or to assess how aid spending is implemented on the ground. Interviewees also pointed to technical challenges, including inconsistent organisation identifiers and fragmented reporting across platforms such as IATI and DevTracker, which complicate efforts to trace funding flows across datasets.³⁶

Several milestones focused on maintaining core UK aid transparency outputs. During the implementation period, the FCDO continued to publish key reporting products such as the Annual Report and Accounts³⁷ and the Statistics on International Development,³⁸ which provide Parliament, CSOs, and the public with official information on UK aid spending and performance. Implementation also included participation in international transparency initiatives and capacity-building related to aid data reporting. For example, training delivered through the British Embassy in Jakarta in October 2025 focused on improving the quality of aid data published to IATI and the understanding of transparency standards among programme teams.³⁹ Additionally, the commitment aimed to strengthen transparency across the wider UK development finance landscape. The FCDO supported the development of the BII Transparency Roadmap, first published in 2023⁴⁰ and updated in 2024 to report on progress in implementing its transparency commitments.⁴¹ Subsequent assessments indicate progress toward this goal: in the 2025 DFI Transparency Index, BII was recognised as the most transparent bilateral development finance institution, reflecting improvements in the disclosure of investment-level information and transparency practices.⁴² Independent experts also identified BII as one area where some meaningful transparency improvements had occurred, noting more precise project-level reporting of climate finance than in previous years.⁴³

Despite improvements in data completeness and reporting practices, several transparency gaps remain. These include reporting by government departments outside FCDO which contribute to ODA spending and the transparency of in-donor refugee costs, which have grown significantly in recent years. The civil society co-chair also pointed to limited public information on the broader strategic direction of UK ODA. While strategic decisions are largely driven by the FCDO, related policy documents and information on future spending priorities are not always publicly available.

Transparency around aid budget reductions also remains limited, making it difficult for CSOs and other stakeholders to understand how funding cuts affect specific programmes and the UK's broader development objectives.⁴⁴

Several milestones sought to strengthen engagement with civil society and other stakeholders on aid transparency. The government gathered feedback on aid data usability primarily through quarterly meetings organised by the civil society network BOND Transparency Working Group.⁴⁵ Stakeholders generally felt their feedback was acknowledged by government counterparts. The civil society co-chair reported that engagement during these meetings was particularly constructive with officials from FCDO and some departments with established ODA reporting practices. However, engagement with departments newer to ODA spending was more limited, reflecting varying levels of familiarity with aid transparency standards.⁴⁶ In addition, a Transparency Community of Practice within government reportedly convened quarterly during the implementation period including at least one in-person meeting each year.⁴⁷ However, public documentation of the discussions and their outcomes was non-existent.

Participation from CSOs in this policy area has narrowed in recent years, as aid budget reductions and shifting organisational priorities have reduced the capacity of some organisations to engage consistently in transparency advocacy. The civil society co-chair noted that two of the three organisations involved through the BOND Transparency Working Group during the design of the commitment were no longer actively participating during the implementation period, as organisational priorities shifted and capacity to focus on transparency work declined.⁴⁸ At the same time, government officials indicated that expanding engagement to include a broader set of data users — such as academic researchers and other analytical communities — could help improve the usability and interpretation of published aid data.⁴⁹

Two milestones were pending at the time of writing — the update of Country Development Partnership Summaries and the response to the 2025 Aid Transparency Review. According to government officials, the country summaries remained pending due to the ongoing redevelopment of DevTracker, which is intended to integrate country-level information more directly within programme data.⁵⁰ Regarding the response to the Aid Transparency Review, the civil society co-chair noted that the review included recommendations aimed at improving transparency practices across ODA-spending departments and that departments were expected to provide responses outlining how they planned to address these recommendations. The government requested additional time at the end of 2025 to allow departments to provide more considered responses rather than rushing the process. Timely publication of these responses would help ensure that the review's recommendations remain relevant and support continued improvements in transparency practices.⁵¹

Evidence suggests that many of the changes introduced under this commitment are likely to be sustained beyond the implementation period and are broadly consistent with the expectations outlined in the IRM Action Plan Review.⁵² The commitment largely succeeded in its goal of maintaining and improving the publication and completeness of UK aid data rather than changes in aid allocation, oversight practices, or programme design. Users of the data continue to face challenges related to usability and the traceability of downstream spending. The commitment therefore reinforced existing transparency practices but resulted in modest rather than substantial early results.

Looking Ahead

Future progress on international aid transparency may depend less on expanding publication requirements and more on strengthening pathways from transparency to use, learning, and accountability. While improvements in data quality and consistency demonstrate the value of targeted system-level refinements, limited evidence on how published aid data is used highlights the importance of strengthening the capacity of stakeholders to interpret and apply this information. Looking ahead, aid transparency is likely to remain relevant as the UK continues to improve the quality, usability, and traceability of published aid data through existing systems such as IATI and DevTracker. If the next action plan continues work on aid transparency, stakeholders suggested focusing on a smaller and more targeted set of milestones to concentrate on priority

reforms, considering the reduced capacity of CSOs engaged in this work. The IRM recommends considering the following steps:

- **Increase transparency around the strategic direction of UK ODA.** Publishing forward-looking policy documents and clearer information on departmental allocations and priorities could help stakeholders better understand how the aid budget is managed and how spending decisions are made.⁵³
- **Increase the granularity and traceability of aid data.** More detailed information on how large contracts are implemented could help researchers, CSOs, and oversight actors better understand how funding is used and where it ultimately reaches.⁵⁴
- **Greater transparency of aid cuts.** Greater visibility on where aid cuts occur and which programmes are affected could help CSOs, implementing partners, and researchers assess how funding changes impact development outcomes and humanitarian commitments.⁵⁵
- **Strengthen reporting practices among implementing organisations.** While many implementing partners are expected to report data through FCDO systems and IATI, reporting compliance appears uneven and enforcement limited.
- **Improve the usability and interoperability of aid transparency data.** Addressing issues such as inconsistent organisation identifiers and fragmented reporting across platforms could make it easier for users to trace funding flows and analyse aid data across datasets.
- **Establish clearer feedback mechanisms between data users and publishing agencies.** Therefore, improvements in transparency respond to analytical needs and practical challenges encountered by those working with aid data.

¹ Procurement Act 2023, c. 54, UK Parliament, <https://www.legislation.gov.uk/ukpga/2023/54/contents>.

² "Transforming Public Procurement," GOV.UK, last updated 11 February 2026, <https://www.gov.uk/government/collections/transforming-public-procurement>.

³ GOV.UK, "Transforming Public Procurement."

⁴ Lucy North (Procurement Reform), interview by the IRM, 4 March 2026.

⁵ North, interview.

⁶ Gavin Hayman and Camila Salazar, "The UK Procurement Act one year on: what does the data tell us?" Open Contracting Partnership, 3 March 2026, <https://www.open-contracting.org/2026/03/03/the-uk-procurement-act-one-year-on-what-does-the-data-tell-us/>.

⁷ Gavin Hayman and Camila Salazar, "UK Procurement Act implementation: what do the first three months of data tell us?," Open Contracting Partnership, 23 June 2025, <https://www.open-contracting.org/2025/06/23/uk-procurement-act-implementation-what-does-the-first-three-months-of-data-tell-us/>; Hayman and Salazar, "The UK Procurement Act one year on."

⁸ North, interview. Lucy North (Procurement Reform), Interview by IRM, March 4, 2026

⁹ Hayman and Salazar, "UK Procurement Act one year on."

¹⁰ North, interview.

¹¹ Ben Butler (Federation of Small Businesses), interview by the IRM, 16 March 2026.

¹² "Signed, sealed, delivered How public procurement can unlock small business growth," Federation of Small Businesses, 15 December 2025, <https://www.fsb.org.uk/resources/policy-reports/signed-sealed-delivered-MCGXDJ3J475NEPFOLCT6WGFAHFVU>.

¹³ Butler, interview.

¹⁴ Butler, interview.

¹⁵ North, interview.

¹⁶ Hayman and Salazar, "UK Procurement Act implementation."

¹⁷ North, interview.

¹⁸ North, interview.

¹⁹ Butler, interview.

²⁰ Federation of Small Businesses, "Signed, sealed, delivered."

²¹ Cabinet Office, "Procurement Review Unit," GOV.UK, last updated 22 February 2026, <https://www.gov.uk/guidance/procurement-review-unit>.

²² North, interview.

²³ North, interview.

²⁴ Butler, interview.

²⁵ "United Kingdom Build Public Dashboards for Open Contracting Data," Open Government Partnership, accessed 4 July 2026,

<https://www.opengovpartnership.org/the-open-gov-challenge/united-kingdom-public-dashboards-contracting-data/>.

²⁶ An alliance of organisations, including Publish What You Fund, Save the Children, and Development Initiatives.

²⁷ “UK NAP6 final status update commitment 2: international aid transparency,” GOV.UK, updated 19 February 2026, <https://www.gov.uk/government/publications/uk-national-action-plan-for-open-government-2024-to-2025-final-commitment-updates/uk-nap6-final-status-updates-commitment-2-international-aid-transparency>.

²⁸ Independent experts, interview by the IRM, 9 March 2026.

²⁹ Elma Jenkins (Publish What you Fund), interview by the IRM, 11 March 2026.

³⁰ “Aid Transparency Index 2024,” Publish What You Fund, accessed 4 July 2026, https://www.publishwhatyoufund.org/app/uploads/dlm_uploads/2024/07/2024-Aid-Transparency-Index-report.pdf.

³¹ Independent Reporting Mechanism, “Action Plan Review: United Kingdom 2023-2025,” Open Government Partnership, accessed 4 July 2026, https://www.opengovpartnership.org/wp-content/uploads/2024/08/United-Kingdom_Action-Plan-Review_2023-2025.pdf.

³² Jenkins, interview.

³³ Jack Lightley and Tina Nickels (Aid Transparency), interview by the IRM, 2 March 2026.

³⁴ Independent experts, interview.

³⁵ Jenkins, interview.

³⁶ Independent experts, interview.

³⁷ Foreign, Commonwealth and Development Office, *Annual Reports and Accounts 2024-2025*, (London: Foreign, Commonwealth and Development Office, 2025), <https://assets.publishing.service.gov.uk/media/687e39109914d1f63267c5e5/FCDO-Annual-Report-and-Accounts-2024-2025.pdf>.

³⁸ Foreign, Commonwealth and Development Office, “Statistics on International Development: final UK ODA spend 2024,” GOV.UK, last updated 26 September 2025, <https://www.gov.uk/government/statistics/statistics-on-international-development-final-uk-oda-spend-2024>.

³⁹ Lightley and Nickels, interview.

⁴⁰ “Transparency Roadmap,” British International Investment, December 2023, <https://assets.bii.co.uk/wp-content/uploads/2024/04/17114126/Transparency-Roadmap.pdf>.

⁴¹ “Transparency Roadmap Update,” British International Investment, December 2024, <https://assets.bii.co.uk/wp-content/uploads/2024/12/20144714/Transparency-Roadmap-Update-December-2024-.pdf>.

⁴² “British International Investment Becomes Most Transparent Bilateral Development Finance Institution,” British International Investment, 26 June 2025, <https://www.bii.co.uk/en/news-insight/news/british-international-investment-becomes-most-transparent-bilateral-development-finance-institution/>.

⁴³ Independent experts, interview.

⁴⁴ Jenkins, interview.

⁴⁵ Lightley and Nickels, interview.

⁴⁶ Jenkins, interview.

⁴⁷ GOV.UK, “UK NAP6 Final Status Update.”

⁴⁸ Jenkins, interview.

⁴⁹ Lightley and Nickels, interview.

⁵⁰ Lightley and Nickels, interview.

⁵¹ Jenkins, interview.

⁵² Open Government Partnership, “Action Plan Review: United Kingdom 2023-2025.”

⁵³ Jenkins, interview.

⁵⁴ Independent experts, interview.

⁵⁵ Jenkins, interview.

Section III. Participation and Co-Creation

Government and civil society kept in communication throughout the implementation period of NAP6 despite institutional disruption following the general election in July 2024. While the MSF did not meet formally between July 2024 and December 2025, groups of civil society engaged directly with relevant policy teams. The resumption of MSF meetings re-established a shared space to discuss progress and increased visibility of the open government agenda.

OGP in the United Kingdom

The open government portfolio was initially overseen by the Central Digital and Data Office (CDDO), a business unit within the Cabinet Office. During the sixth national action plan (NAP6) cycle, responsibility for open government policy transferred to the Civil Service Strategy Unit (CSSU) within the Cabinet Office in April 2025.¹ This change was necessitated by the fact that CDDO was moved from Cabinet Office into Department for Science, Innovation and Technology (DSIT). While the OGP Point of Contact (PoC) remained the same, the transition period created coordination challenges for the central team for managing the OGP process.

The Multi-Stakeholder Forum (MSF) is the primary platform for dialogue between government and civil society on open government.² Civil society participation in the MSF is coordinated through the UK Open Government Network (UK OGN), whose steering committee members regularly participate in MSF discussions. The limited number of commitments in the sixth action plan meant that participation was concentrated among stakeholders already engaged in the relevant policy areas.³ Following the 2024 general election in the UK, the incoming government reorganised responsibilities across central government departments, ultimately transferring coordination of the OGP process from the CDDO to the CSSU within the Cabinet Office. This internal restructuring created coordination challenges for the central team and contributed to a pause in MSF meetings between July 2024 and December 2025.⁴ Implementation of commitments continued under individual policy leads. Civil society generally understood the institutional challenges affecting coordination within government and maintained constructive engagement with officials during this period.⁵

Several broader developments outside of the NAP framework supported the institutionalisation of open government principles in the UK. This included work led by the Department for Culture, Media and Sport to develop a Civil Society Covenant aimed at strengthening collaboration between government and civil society, as well as proposed Public Office (Accountability) Bill. This would introduce a legal duty for public servants to act with candour, transparency and frankness at all times with criminal sanctions for egregious breaches. During the same period, the UK was elected as incoming co-chair of OGP (for October 2026 to September 2027) and contributed to the OGP Action Framework Task Force reviewing the global action plan framework.⁶ These activities, alongside internal work to improve understanding of participatory governance approaches across government, helped strengthen awareness and coordination of open government initiatives beyond the formal action plan process.⁷ The civil society co-chair of the MSF highlighted that initiatives such as the proposed Public Office (Accountability) Bill represent important steps toward accountability and transparency. However, he suggested that linking these reforms across departments and communicating them as part of a wider agenda for transparency, accountability, and participatory governance could strengthen the visibility and impact of open government efforts.⁸

The PoC indicated that a key challenge in coordinating open government is the breadth of the agenda. Open government policy spans a wide range of thematic areas across government, and responsibility for related activities is distributed across multiple departments and teams. Relevant policy teams oversee different parts of the open government agenda, with the team in the CSSU primarily convening and coordinating involvement in the action plan and MSF.⁹ A more whole-of-government approach to embedding open government principles could help improve alignment across departments and strengthen the coherence of the UK's open government agenda.

Action Plan Co-Creation

The co-creation of NAP6 began in spring 2023 and concluded in December 2023. The process followed a four-stage approach consisting of planning, outreach, action plan development, and feedback.¹⁰ During the planning phase, government and civil society agreed on a timetable for co-creation and introduced a series of gateway meetings within the MSF to oversee the process and monitor progress on the previous action plan.¹¹ Between May and June 2023, civil society led a public call for ideas, while the CDDO coordinated internal outreach within government.¹² The public consultation received 61 submissions proposing ideas, problems, and evidence for potential commitments. The CDDO analysed these submissions based on their relevance to open government, potential significance, and the capacity of government and civil society to collaborate on their development within the available timeframe.¹³ The analysis informed discussions at the June 2023 MSF.¹⁴ The consultation process and MSF discussions enabled civil society to influence which thematic areas were taken forward for commitment development.

Following this stage, government and civil society agreed to develop commitments in four thematic areas: open contracting, aid transparency, civil society engagement on anti-corruption, and the United Nations Convention Against Corruption country review mechanism. Thematic Stakeholder Groups (TSGs), composed of government officials and civil society representatives, were established to develop draft commitments. Civil society leadership within these groups included the BOND Transparency Working Group, the UK Anti-Corruption Coalition, and the UK Open Contracting Advisory Group. Three additional themes - beneficial ownership, freedom of information, and open justice - were discussed but not taken forward.¹⁵

The commitments were drafted through the TSGs and finalised in the MSF ahead of the OGP deadline of 31 December 2023. The action plan was approved with only minor textual changes during the final internal government review process and was published on GOV.UK and submitted to OGP on 18 December 2023.¹⁶ Compared with the previous action plan, civil society and government agreed that NAP6 would prioritise a smaller number of commitments. Civil society stakeholders generally welcomed the collaborative nature of the process compared to previous action plans, while noting that future co-creation processes could benefit from longer outreach periods and greater resources to expand participation.¹⁷ As noted in the IRM Action Plan Review, civil society and government wanted to meet the submission deadline of the NAP in order to not detract from the UK's reengagement in OGP.¹⁸ The PoC noted that OGP's fixed deadline for submission of the action plan limited opportunities for broader outreach and efforts were focused on refining a smaller number of feasible proposals within the two-year NAP timeframe.¹⁹

Participation during Implementation

The MSF did not meet between July 2024 and December 2025, more than half of the implementation period of NAP6. However, civil society remained engaged with government counterparts across all four commitments. In many cases, engagement occurred through direct collaboration with policy leads responsible for implementing commitments.²⁰ Participation structures varied across commitments. Open contracting (Commitment 1), for example, benefited from an established advisory group involving civil society organisations, academic experts, and private sector representatives. This group met regularly for stakeholders to engage with government counterparts during implementation. In other thematic areas, engagement was generally informal, involving smaller groups of stakeholders working directly with relevant policy teams.

While official MSF meetings were paused, government officials remained in contact with civil society through the monthly UK OGN steering committee meetings, where government representatives provided updates on developments related to NAP6.²¹ The government also provided updates at UK OGN meetings and international OGP events.²² These interactions helped ensure that civil society stakeholders remained aware of implementation progress. During this period, the coordination team adopted a light-touch approach, relying primarily on informal check-ins with policy teams rather than requesting regular formal updates.²³ The government published updates and materials on the NAP6 commitments on GOV.UK.

The first MSF meeting following the hiatus was held in December 2025 and a follow up meeting was held in February 2026.²⁴ Government officials noted that the December meeting allowed policy leads to present updates on implementation progress during the period when the MSF had not met. The resumption of MSF meetings re-established a shared space for stakeholders to discuss progress across commitments and increased visibility of the broader open government agenda.²⁵ However, the civil society co-chair noted that while stakeholders involved in specific commitments continued working closely with government counterparts, the absence of MSF meetings made it more difficult for participants to track progress across all four commitments and stay informed about the broader open government agenda.²⁶ The civil society co-chair suggested that future action plans could benefit from more public reporting and clearer indicators to help stakeholders, including those not part of the UK OGN, better track implementation and support accountability.²⁷

Table 2. Compliance with Minimum Requirements

The IRM uses the OGP Participation and Co-Creations Standards to assess countries' participatory practices throughout the action plan cycle.²⁸ Countries are encouraged to aim for the full ambition of the standards and to comply with the minimum requirements under each standard.²⁹ The OGP Criteria and Standards Subcommittee determines if a country has acted according to OGP process.³⁰

Minimum requirement	Co-creation	Implementation
1.1 Space for dialogue: The MSF met during the early implementation period. Following the general election, there were no meetings between July 2024 and December 2025 due to institutional changes affecting the government coordination team. ³¹ However, at least every six months there was some form of dialogue between government and civil society during this period, through government officials attending UK OGN meetings and engagement around individual commitments. Terms of reference outlining the MSF's structure and participation were published on GOV.UK during the implementation period. ³² The UK OGN continues to be the main interlocutor between government and civil society.	Yes	Yes
2.1 OGP website: Information on the UK's OGP process is available on both the UK OGN website ³³ and on GOV.UK, both of which provide official information on the action plan and related developments.	Yes	Yes
2.2 Repository: The UK OGN and GOV.UK websites serve as the UK's OGP online repositories. ³⁴ Updates on these websites were less frequent during the period when there were no MSF meetings and resumed following the MSF meeting in December 2025.	Yes	Yes
3.1 Advanced notice: See the Action Plan Review ³⁵	Yes	Not applicable
3.2 Outreach: See the Action Plan Review	Yes	Not applicable
3.3 Feedback mechanism: See the Action Plan Review	Yes	Not applicable
4.1 Reasoned response: See the Action Plan Review	Yes	Not applicable
5.1 Open implementation: Government officials engaged with civil society stakeholders on implementation of commitments through direct collaboration with policy leads and with the UK OGN during the period when the MSF did not meet. When the MSF resumed meetings in December 2025, policy leads presented updates on implementation progress and provided an opportunity for stakeholders to discuss developments.	Not applicable	Yes

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- ¹ Cabinet Office, “UK National Action Plan for Open Government 2024-2025 Co-creation Self-assessment,” GOV.UK, 4 December 2025, <https://www.gov.uk/government/publications/uk-national-action-plan-for-open-government-2024-2025-co-creation-self-assessment/uk-national-action-plan-for-open-government-2024-2025-co-creation-self-assessment>.
- ² Matthew Donnelly and Ben Gittins (Cabinet Office), interview by the IRM, 2 March 2026.
- ³ Donnelly and Gittins, interview.
- ⁴ Donnelly and Gittins, interview.
- ⁵ Kevin Keith (UK OGN Chair), interview by the IRM, 9 March 2026.
- ⁶ OGP Steering Committee, “Terms of Reference: Action Framework Task Force,” Open Government Partnership, accessed 4 July 2026, https://www.opengovpartnership.org/wp-content/uploads/2025/05/Action-Framework-Task-Force_TORs.pdf.
- ⁷ Donnelly and Gittins, interview.
- ⁸ Keith, interview.
- ⁹ Donnelly and Gittins, interview.
- ¹⁰ “Developing the 6th National Action Plan for Open Government (2024 – 2025),” UK Open Government Network, accessed 4th July 2026, <https://opengovernment.org.uk/nap6/>.
- ¹¹ Cabinet Office, “UK National Action Plan.”
- ¹² UK Open Government Network, “6th National Action Plan.”
- ¹³ Cabinet Office, “UK National Action Plan.”
- ¹⁴ “Multi-Stakeholder Forum Read-out,” GOV.UK, 22 June 2023, https://assets.publishing.service.gov.uk/media/687fa10676595a511a8a74b6/2023-06-22_MSF_Readout.pdf.
- ¹⁵ Cabinet Office, “UK National Action Plan.”
- ¹⁶ UK Open Government Network, “6th National Action Plan.”
- ¹⁷ Keith, interview.
- ¹⁸ Independent Reporting Mechanism, “Action Plan Review: United Kingdom 2023-2025,” Open Government Partnership, accessed 4 July 2026, https://www.opengovpartnership.org/wp-content/uploads/2024/08/United-Kingdom_Action-Plan-Review_2023-2025.pdf.
- ¹⁹ Donnelly and Gittins, interview.
- ²⁰ Donnelly and Gittins, interview; Keith, interview.
- ²¹ Keith, interview.
- ²² Donnelly and Gittins, interview.
- ²³ Donnelly and Gittins, interview.
- ²⁴ Keith, interview.
- ²⁵ Keith, interview.
- ²⁶ Keith, interview.
- ²⁷ Keith, interview.
- ²⁸ “OGP Participation and Co-Creation Standards,” Open Government Partnership, 2021, <https://www.opengovpartnership.org/ogp-participation-co-creation-standards/>.
- ²⁹ “IRM Guidelines for the Assessment of Minimum Requirements,” Independent Reporting Mechanism, 2022, https://www.opengovpartnership.org/wp-content/uploads/2022/05/IRM-Guidelines-for-Assessment-of-Minimum-Requirements_20220531_EN.pdf.
- ³⁰ On 1 August 2025, the OGP Criteria and Standards Subcommittee adopted a resolution on Temporary Suspension of the Enforcement of Time-Bound Minimum Requirements for Participation and Co-Creation, for all members currently implementing plans delivered on or after 1 January 2024. <https://www.opengovpartnership.org/wp-content/uploads/2025/08/Resolution-of-CS-on-the-Temporary-Suspension-of-the-Enforcement-of-Time-Bound-Minimum-Requirements-2.pdf>; For information on the OGP Procedural Review Policy see: <https://www.opengovpartnership.org/procedural-review/#IC>.
- ³¹ Donnelly and Gittins, interview.
- ³² “UK Multi-Stakeholder Forum for Open Government,” GOV.UK, accessed 5 July 2026, <https://www.gov.uk/government/groups/uk-multi-stakeholder-forum-for-open-government>
- ³³ “UK Open Government Civil Society Network,” UK Open Government, accessed 5 July 2026, <https://opengovernment.org.uk>.
- ³⁴ UK Open Government Network, “6th National Action Plan.”
- ³⁵ Independent Reporting Mechanism, “United Kingdom 2023-2025.”

Section IV. Methodology

This report supports countries' accountability and learning through assessment of the action plan's level of completion and early results. The report provides in-depth analysis of commitments or clusters that achieved the strongest early results in the action plan. It also assesses the country's participation and co-creation practices throughout the action plan cycle.¹

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

- **Co-Creation Brief:** A concise brief that highlights lessons from previous IRM reports to support a country's OGP process, action plan design, and overall learning.
- **Action Plan Review:** A technical review of the characteristics of the action plan and the strengths and challenges the IRM identifies to inform a stronger implementation process.
- **Midterm Review:** A review for four-year action plans after a refresh at the midpoint. The review assesses new or significantly amended commitments in the refreshed action plan, compliance with OGP rules, and provides an informal update on implementation progress.
- **Results Report:** An overall implementation assessment that focuses on policy-level results and how changes happen. It also checks compliance with OGP rules and informs accountability and longer-term learning.

In Results Reports, the IRM assesses commitments using two indicators:

Completion

The IRM assesses the level of completion for each commitment in the action plan, including commitments clustered in the Action Plan Review.² The level of completion for all commitments is assessed as one of the following:

- No Evidence Available
- Not Started
- Limited
- Substantial
- Complete

Early Results

The IRM assesses the level of early results from implementation for each commitment or cluster. To do so, the IRM considers commitments' objective, the country context, the policy area, and the evidence of changes. The Early Results indicator is determined by the depth of change that occurred and the evidence of whether the change will be sustained in time. The early results indicator establishes three levels of results:

- **No Notable Results:** According to the evidence collected (through desk research, interviews, etc.), the implementation of the open government commitment led to little or no positive results. After assessing the activities carried forward during the period of implementation and its outcomes (if any), the IRM did not find meaningful changes towards:
 - improving practices, policies or institutions governing a policy area or within the public sector,
 - enhancing the enabling environment to build trust between citizens and the state.
- **Moderate Results:** According to the evidence collected (through desk research, interviews, etc.) the implementation of the open government commitment led to positive results. After assessing the activities carried forward during the period of implementation and its outcomes, the IRM found meaningful changes towards:
 - improving practices, policies or institutions governing a policy area or within the public sector, or
 - enhancing the enabling environment to build trust between citizens and the state.
- **Significant Results:** According to the evidence collected (through desk research, interviews, etc.) the implementation of the open government commitment led to

significant positive results. After assessing the activities carried forward during the period of implementation and its outcomes, the IRM found meaningful changes towards:

- improving practices, policies or institutions governing a policy area or within the public sector, or
- enhancing the enabling environment to build trust between citizens and the state.

Significant positive results show clear expectations for these changes (as defined above) will be sustainable in time.

This report was prepared by the IRM in collaboration with an independent researcher and was reviewed by Andy McDevitt, IRM external expert. The IRM methodology, quality of IRM products and review process is overseen by the IRM's International Experts Panel (IEP).³ For more information, refer to IRM webpage⁴ or the glossary of IRM and OGP terms.⁵

¹ For definitions of OGP terms, such as co-creation and promising commitments, see "OGP Glossary," <https://www.opengovpartnership.org/glossary/>.

² The IRM clusters commitments that share a common policy objective during the Action Plan Review process. In these instances, the IRM assesses "Potential for Results" and "Early Results" at the cluster level. The level of completion is assessed at the commitment level. For more information on how the IRM clusters commitments, see Section IV on Methodology in the Action Plan Review.

³ "International Experts Panel," Open Government Partnership, Independent Reporting Mechanism, <https://www.opengovpartnership.org/about/who-we-are/international-experts-panel/>.

⁴ "IRM Overview," Open Government Partnership, <https://www.opengovpartnership.org/irm-guidance-overview/>.

⁵ "OGP Glossary," Open Government Partnership, <https://www.opengovpartnership.org/glossary/>.

Annex I. Commitment Data¹

Commitment 1: Open contracting	
• Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Substantial	• Completion: Substantial • Early results: Significant Results
This commitment is assessed in Section II above	
Commitment 2: International aid transparency	
• Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Modest	• Completion: Substantial • Early results: Moderate Results
This commitment is assessed in Section II above	
Commitment 3: Engagement on anti-corruption	
• Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Unclear	• Completion: Complete • Early results: Moderate
This commitment aimed at strengthening engagement between the UK government and civil society on anti-corruption priorities, including regular dialogue on the UK Anti-Corruption Strategy (ACS) and UK participation in international anti-corruption processes under the United Nations Convention Against Corruption (UNCAC). All milestones were completed. The UK government, alongside civil society representatives, participated in the 10th UNCAC Conference of States Parties (COSP) in December 2023, as well as the 11th UNCAC COSP in 2025.² UK participation in both conferences is publicly documented, including a UK National Statement delivered at UNCAC COSP 2025, confirming sustained engagement in global anti-corruption fora.³ Civil society representation formed part of the UK's engagement in the UNCAC process, consistent with recognised mechanisms from United Nations Office on Drugs and Crime for civil society participation at COSP sessions. Civil society organisations coordinated through the UK Anti-Corruption Coalition (UKACC) contributed to UK engagement and shared reflections on conference outcomes.⁴ At the domestic level, the milestone on regular engagement between the Joint Anti-Corruption Unit and UKACC was fulfilled through ongoing dialogue on the development and implementation of the ASC and related priorities. UKACC and its member organisations publicly reference sustained engagement with government on the ASC.⁵ UKACC published an analysis of the ACS highlighting aspects they welcomed, as well as potential gaps. UKACC convened a panel at the launch event for the strategy, giving civil society a prominent role at the event, and subsequently the Prime Minister's Anti-Corruption Champion convened an External Engagement Group with civil society representatives, MPs, and others to support monitoring and implementation of the strategy.⁶ A member of UKACC who was involved in civil society engagement in the development and launch of the ACS confirmed that civil society input influenced the content and scope of the ACS.⁷ There are plans for ongoing civil society monitoring around the implementation of the ACS, through a government-run stakeholder	

group. This group has met once already and is due to meet again in the autumn of 2026. Due to civil society's active engagement in the development and monitoring of the ACS, the IRM assesses this commitment as having moderate early results in improving civic participation in the UK.

Commitment 4: UN Convention Against corruption

- | | |
|---|--|
| <ul style="list-style-type: none"> ● Verifiable: Yes ● Does it have an open government lens? Yes ● Potential for results: Unclear | <ul style="list-style-type: none"> ● Completion: Substantial ● Early results: No Notable Results |
|---|--|

This commitment aimed to strengthen transparency and inclusivity within the UNCAC's Implementation Review Mechanism (IRM), through collaboration between the UK government, civil society, the UNCAC Coalition, and OGP.

The UK government and civil society participated in key UNCAC forums, including the UNCAC COSP in December 2023 and December 2025, as well as meetings of the UNCAC Working Group on the Implementation Review Mechanism in Vienna in 2024 and 2025. These activities fulfilled milestones related to plenary participation, negotiation of resolutions, bilateral engagement, and proposals to strengthen the UNCAC IRM. Based on available evidence, this participation continued established practices of how the UK Government and civil society engaged in these processes from previous UNCAC cycles. However, sustained civil society involvement in UNCAC forums is a positive practice that supports the UK's broader commitment to inclusive multilateral engagement on anti-corruption and contributes to its international leadership in this area.

Several deliverables are tied to the UK's next UNCAC review cycle. These include the publication of review timelines, the full UK review report, and guidance on how civil society and non-state actors can engage in the review and follow-up process. The current UNCAC review cycle is expected to conclude in June 2026,⁸ and the date of the next UNCAC IRM cycle has not yet been confirmed. As a result, these deliverables could not be fully completed within the OGP action plan timeframe and are expected to be incorporated into the next UNCAC review cycle.

While this commitment aligned with established UK engagement in UNCAC processes, progress was partly dependent on multilateral negotiation and external timelines. As a result, the commitment has yet to demonstrate measurable improvements in the transparency or inclusivity of the UNCAC implementation review process compared to the UK's existing practices.

At COSP11 in December 2025, Resolution 11/2 confirmed the launch of the second phase of the UNCAC Implementation Review Mechanism, with reviews commencing following the drawing of lots at the 18th session of the Implementation Review Group in 2027. The deliverables under this commitment that were tied to the next review cycle are therefore expected to be incorporated into this newly confirmed second phase.

¹ Editorial notes:

1. For commitments that are clustered, the assessment of potential for results and early results is conducted at the cluster level, rather than the individual commitment level.
2. Commitments' short titles may have been edited for brevity. For the complete text of commitments, please see the UK's action plan: <https://www.opengovpartnership.org/documents/united-kingdom-action-plan-2023-2025-december/>
3. For more information on the assessment of the commitments' design, see the UK's Action Plan Review: <https://www.opengovpartnership.org/documents/united-kingdom-action-plan-review-2023-2025/>

² "International Anti-Corruption Day 2025," UNCAC Coalition, 9 December 2025, <https://uncaccoalition.org/international-anti-corruption-day-2025/>

³ Home Office, "UK National Statement to UNCAC 2025," GOV.UK, 15 December 2025,

<https://www.gov.uk/government/publications/uk-national-statement-to-uncac-2025/uk-national-statement-to-uncac-2025>

⁴ "The Fight Against Corruption," UK Anti-Corruption Coalition, accessed 5 July 2026, <https://www.ukanticorruptioncoalition.org>

⁵ Home Office, *UK Anti-Corruption Strategy 2025*, (London: Home Office, 2025)

https://assets.publishing.service.gov.uk/media/6932caa7375aee4a15ee8c8c/36.37_HO_JACU-Strategy_v12b_FINAL_WEB.pdf

⁶ "Exclusive: UKACC's Expert Analysis of the New Anti-Corruption Strategy," UK Anti-Corruption Coalition, accessed 5 July 2026, <https://static1.squarespace.com/static/5f6df6d897255f2b8e83c9ce/t/695e8ce3974c91211193143/1767804131812/UKACC+A-CS+Analysis.pdf>

⁷ Civil society member of the UK Anti-Corruption Coalition, correspondence with the IRM, 21 June 2026.

⁸ "Second phase of the Implementation Review Mechanism," United Nations Office on Drugs and Crime, accessed 5 July 2026, <https://www.unodc.org/corruption/en/uncac/implementation-review-mechanism-next-phase.html>