

**Assessment of the Implementation of the  
Recommendations of the Bishop of Truro's  
Independent Review of FCDO Support for Persecuted  
Christians**

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# 1. Introduction

This report presents an assessment of the implementation of the Recommendations set out in the Final Report of the ‘Bishop of Truro’s Independent Review for the Foreign Secretary of FCO Support for Persecuted Christians’ (the Review).<sup>1</sup>

According to the Assessment Team’s Terms of Reference (ToR), we set out to answer the following questions:

- a. What progress has the Foreign and Commonwealth Development Office (FCDO) made in implementing each of the Bishop of Truro’s recommendations (the Recommendations)?
- b. What factors and constraints (resources, political context, others) have influenced implementation both positively and negatively?
- c. How far has implementing the Recommendations supported the FCDO’s ‘FoRB for all’ policy priority?
- d. What lessons can be drawn for further work on FoRB?

The Assessment Team interpreted its ToR in light of Recommendation 22 of the Review. The Team focused its attention on assessing the extent to which the Recommendations have been implemented as an element of the FCDO’s human rights operations (ToR a), and considered the factors and constraints influencing implementation (ToR b). Additionally, the Team reflected on the implications and impact of the Recommendations and identified key lessons that emerged from the implementation process (ToR c and d).

## 1.1 Methodology

This assessment was undertaken in a seven-week period between February and April 2022. The Assessment Team conducted a wide range of interviews (both in-person and online) with FCDO staff from various UK-based teams, desk officers and FCDO officials situated at posts, other key officials and post-holders concerning their work relating to FoRB, those involved in the original review, and a range of civil society actors. Over 75 interviewees contributed to the assessment.

In this review, the Assessment Team drew on the information and views received during these interviews, documentation provided at its request by the FCDO and interviewees, and open source material. In gathering the information, the Assessment Team adhered to data protection and ethical standards. All interviewees were informed that their comments and observations would be kept confidential and non-attributable. This approach was adopted to ensure candid responses from those whom the Assessment Team consulted. The Team is grateful for the openness and candour of the interviewees and the cooperation extended by the FCDO.

In assessing the status of implementation of the Recommendations, the Assessment Team drew on the conceptual framework developed by the United Nations Office of the High Commissioner for Human Rights for assessing how states operationalise their human rights obligations.<sup>2</sup> The tool is designed to

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<sup>1</sup> *Bishop of Truro’s Independent Review for the Foreign Secretary of FCO Support for Persecuted Christians, Final Report and Recommendations* (2019), available at: <https://christianpersecutionreview.org.uk/report/>.

<sup>2</sup> Office of the United Nations High Commissioner for Human Rights (OHCHR), *Human Rights Indicators: A Guide for Measurement and Implementation* (New York and Geneva: United Nations, 2012), available at: [https://www.ohchr.org/sites/default/files/Documents/Publications/Human\\_rights\\_indicators\\_en.pdf](https://www.ohchr.org/sites/default/files/Documents/Publications/Human_rights_indicators_en.pdf).

track the progress made by duty-bearers across three dimensions: (i) structural measures that are necessary to give legal or institutional effect to a commitment, (ii) on-going processes that demonstrate the level of effort made, and (iii) outcomes.

Given the dynamic nature of diplomacy, this assessment of the progress the FCDO has made in delivering the Recommendations can only provide a snapshot at the time the research was conducted. We note that meaningful implementation or operationalisation requires sustained focus and determination.

The Assessment Team was conscious that several Recommendations involved a qualitative dimension. Additionally, certain Recommendations contained several subcomponents. Moreover, as already noted, the Assessment Team's approach included examining progress across the three dimensions of the operationalisation of the Recommendations. Given this three-tiered approach to implementation, the Assessment Team believed that it would be helpful to use a matrix that could identify progress and gaps with specificity. Accordingly, the Assessment Team assessed each Recommendation (including its subcomponents) along a spectrum reflected in the following implementation bands:

1. The Recommendation has reached an advanced stage of delivery/performance, i.e. there are indicators of activity across all three dimensions of implementation;
2. The Recommendation is in the process of being delivered, i.e. there is evidence of activity in the first two dimensions of implementation;
3. The Recommendation has encountered constraints during delivery, i.e. structural/institutional steps may have been taken but have not progressed to the next dimensions of implementation;
4. Achieving the Recommendation's objective has involved an alternative/remodelled approach; and
5. No substantial action has been taken, to date, with respect to delivering the Recommendation.

The distinction between the third and fourth implementation bands is important. The third band is used where the Assessment Team observed that the FCDO sought to implement the Recommendation, but nevertheless encountered constraints which affected its ability to realise the Recommendation—often likely in terms of the feasibility of the Recommendation. By contrast, the fourth band is used when the Recommendation's objectives were pursued through means other than those specifically contemplated by the Review. These Recommendations have not been implemented precisely in accordance with the wording as set out in the Review. However, the FCDO appears to have embraced the specific objectives behind such Recommendations and has engaged in activities that aim to advance such goals.

## **1.2 Factors Influencing Implementation**

In September 2021, the Foreign and Commonwealth Office (FCO) and the Department for International Development (DFID) merged to create the (FCDO). The Review was originally addressed to the FCO, and the merger with DFID brought with it changes to both staffing and operational contexts. However, the merger did not appear to cause any specific impediments to implementing the Recommendations.

Numerous other factors have affected the capacity of the FCDO to implement the Recommendations in a timely fashion. Due to the Covid-19 pandemic, a significant number of staff across the FCDO in the UK and internationally, including members of the ForB policy team and the Special Envoy's office, were redeployed towards Covid-19 response for extended periods. This hampered the implementation of some of the Recommendations. Additionally, in the last twelve months, numerous staff were also redeployed from across the FCDO in response to the situations in Afghanistan and Ukraine.

While Covid-19 mitigation measures also limited face-to-face work by posts in-country, such as engagement with community groups, the shift to online working catalysed by Covid-19 has made it easier to facilitate some meetings and cross-departmental communication.

The Review came at a time of increasing interest in and engagement with FoRB globally, including by Her Majesty's Government (HMG). Additionally, there were some contextual changes in certain countries that made them more receptive to FoRB. Therefore, the subsequent undertaking of some of the activities contemplated by the Recommendations, such as tailored responses in-country, may have also been the result of other factors. The Review did, however, have the effect of increasing awareness of FoRB within HMG, and there appears to be increased political endorsement for making FoRB a priority as a direct result of the Review.

## 2. Assessment of Implementation

### 2.1 Strategy and Structure

#### 2.1.1 FCDO Approach to FoRB

The FCDO's promotion of 'FoRB for all' is one of the established human rights priorities for the UK and is one of the priority actions in the Integrated Review of Security, Defence, Development and Foreign Policy.<sup>3</sup> The FCDO's 2021 Delivery Plan provides that '[t]he UK will continue to stand up for human rights around the world as a force for good, including by promoting Freedom of Religion or Belief for all'.<sup>4</sup> It should, however, be noted that the commitment to coordinating action against discrimination in the Delivery Plan does not include religion or belief in the list of 'protected characteristics'. The UK also pledged to support FoRB in the UN Human Rights Council UK 2021-2023 Candidacy,<sup>5</sup> and a commitment to FoRB was included in the Open Societies section of the G7 Foreign and Developmental Ministerial Communiqué for the first time.<sup>6</sup>

The FCDO has made strides towards ensuring that FoRB, alongside other human rights and values, is mainstreamed into its organisational culture and, as such, Recommendation 1 is '**in the process of being delivered**'. The FCDO has developed a set of core values relating to FoRB and, in March 2022, published these on the dedicated FoRB page on the Intranet. The FCDO has also investigated the feasibility of developing a 'Diplomatic Code' to reflect such values, however codes of this nature are not utilised by the FCDO. Alternative means of mainstreaming such values (i.e. through publishing and disseminating

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<sup>3</sup> HM Government, *Global Britain in a competitive age: The Integrated Review of Security, Defence, Development and Foreign Policy* (March 2021), available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/975077/Global\\_Britain\\_in\\_a\\_Competitive\\_Age\\_the\\_Integrated\\_Review\\_of\\_Security\\_Defence\\_Development\\_and\\_Foreign\\_Policy.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/975077/Global_Britain_in_a_Competitive_Age_the_Integrated_Review_of_Security_Defence_Development_and_Foreign_Policy.pdf).

<sup>4</sup> FCDO, 'Delivery Plan' (2021), available at: <https://www.gov.uk/government/publications/foreign-commonwealth-development-office-outcome-delivery-plan/fcdo-outcome-delivery-plan-2021-to-2022>

<sup>5</sup> FCDO, 'UN Human Rights Council: United Kingdom, 2021-2023 Candidate', available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/925677/un-human-rights-council-uk-2021-2023-candidate.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/925677/un-human-rights-council-uk-2021-2023-candidate.pdf).

<sup>6</sup> FCDO, 'G7 Foreign and Development Ministers' Meeting, Communiqué, London, 5 May 2021' (5 May 2021), available at: <https://www.gov.uk/government/publications/g7-foreign-and-development-ministers-meeting-may-2021-communicue/g7-foreign-and-development-ministers-meeting-communicue-london-5-may-2021#iii--open-societies>.

core values on the FCDO Intranet) were explored and it is understood that the FCDO continues to monitor the value of developing such a code.

There are differing views among interviewees as to whether a culture shift has taken place in the FCDO with respect to FoRB. Some interviewees observed that a shift has not yet begun to take place, noting that when FoRB issues are raised the discussion moves to human rights more generally and the focus on religion or belief is lost. They reported that FoRB has a tendency to be folded into other important human rights priorities, and this tendency can detract from the need to recognise religion or belief as an independent ground of vulnerability.

### ***2.1.2 Special Envoy for FoRB***

Recommendation 6 comprises a number of elements that are at varying stages of implementation. One of the main aspects of this Recommendation, which concerns the appointment of a Special Envoy for FoRB, has reached **‘an advanced stage of delivery’**, as the position has been established and is functioning. The Special Envoy operates within specific Terms of Reference, as do other special envoys. This position is currently held by Fiona Bruce MP who was appointed in December 2020.<sup>7</sup>

The phrase ‘permanently, and in perpetuity’ in Recommendation 6 appears to contemplate a permanent Special Envoy position established by law rather than appointed by the Prime Minister. To do so would be unprecedented, as no special envoy position in the UK has thus far been established by law. This would be a political decision rather than an action to be undertaken by the FCDO. The establishment of such a permanent position has not occurred, and so **‘no substantial action has been taken, to date’** with respect to delivering this aspect of the Recommendation.

Recommendation 6 also calls for the establishment of the role of Special Envoy for FoRB ‘with appropriate resources and authority to work across FCO departments’. This aspect of the Recommendation has encountered **‘constraints during delivery’**. Concerns were raised that the Special Envoy position has not been sufficiently integrated operationally into the FCDO and, as such, faced institutional challenges in exercising the degree of authority Recommendation 6 appears to envisage.

To date, there have been three post-holders, one a serving minister of state and two parliamentarians.<sup>8</sup> The institutional relationship of the Special Envoy to the government appears to influence the ability of the office holder to work across the FCDO as seen from the experience of three Special Envoys on FoRB to date, where the two most recent Special Envoys have been parliamentarians and not members of the government. Special envoy positions are not standardised across government, although a number exist.

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<sup>7</sup> FCDO, ‘Prime Minister Boris Johnson appoints new Envoy for Freedom of Religion or Belief’ (20 December 2020), available at: <https://www.gov.uk/government/news/prime-minister-boris-johnson-appoints-new-envoy-for-freedom-of-religion-or-belief>.

<sup>8</sup> Lord Ahmad of Wimbledon was appointed as the Prime Minister’s Special Envoy on Freedom of Religion or Belief on 4 July 2018, see Prime Minister’s Office, 10 Downing Street, Foreign and Commonwealth Office, The Rt Hon Theresa May MP, and Lord Ahmad of Wimbledon, ‘Lord Ahmad appointed as PM’s Special Envoy to promote religious freedom’ (4 July 2018), available at: <https://www.gov.uk/government/news/lord-ahmad-appointed-as-pms-special-envoy-to-promote-religious-freedom>. Rehman Chishti succeeded Lord Ahmad in the role on 12 September 2019, see Foreign and Commonwealth Office, The Rt Hon Boris Johnson MP, The Rt Hon Dominic Raab MP, ‘UK appoints new Prime Minister’s Envoy for Freedom of Religion and Belief’ (12 September 2019), available at: <https://www.gov.uk/government/news/uk-appoints-new-pm-envoy-for-freedom-of-religion-belief>

Some interviewees suggested that the role might be more effective if the Special Envoy were a formal part of the apparatus of government whereas others valued the independence that a Special Envoy outside the formal apparatus of government brings to the role. The privileges and entitlements enjoyed by the Special Envoy's office are not at all clear. The Special Envoy may not always have had the opportunity to contribute to matters germane to the Envoy's mandate in a sufficiently timely fashion.

Special Envoys on FoRB are supported by the FCDO FoRB and media teams and can also draw upon expertise in the diplomatic and developmental networks. A number of interviewees observed that the adequacy of support and resourcing for the Special Envoy position has, however, fluctuated over time.

One aspect of Recommendation 2, i.e. 2(b), calls for advocacy within multilateral institutions, such as the United Nations Human Rights Council (UNHRC), Organisation for Security and Co-operation in Europe (OSCE), and Council of Europe (COE), that member states introduce a special envoy position for FoRB with a particular emphasis on members of religious minorities. This aspect of the Recommendation has involved '**an alternative approach**' to delivery. Some interviewees pointed out that HMG publicly advocating, within such multilateral institutions, for member states to adopt such a role, was considered inappropriate. Instead, a strategy of highlighting the UK's post of Special Envoy for FoRB during bilateral engagement, and at selected multilateral fora, was considered a more appropriate approach, and in keeping with the central objective of this aspect of the Recommendation. For example, it is understood that advocacy for creating FoRB special envoy positions took place at the G7 during the UK Presidency in 2021. It should be noted that the UK played a key role in 2020 in establishing the International Religion and Belief Alliance (IRFBA) through its former Special Envoy. This initiative induced numerous countries to establish FoRB Focal Points including by creating FoRB envoys.<sup>9</sup>

### ***2.1.3 DG FoRB Champion and Board***

Recommendation 6 calls for the Special Envoy on FoRB to be supported by a Director-General (DG) level champion for FoRB. This Recommendation is '**in the process of being delivered**'. Peter Jones served as DG level champion from 19 December 2019 to 1 September 2020 and, after the FCO's merger with DFID, Sir Iain Macleod was appointed FoRB Board Sponsor on 2 September 2020. This post-holder has, however, recently retired.

Recommendation 16 calls for 'the FCO to establish a Board chaired by the Director General champion for FoRB and supported by the FoRB team to advise cross-governmentally...on the state of FoRB and rights for members of religious minorities globally and offer advice to other government departments on how best to respond to the challenges presented.' A cross-HMG DG Integrated Review Implementation Group (IRIG) on Open Societies was formed in late 2021, with FoRB as one of its thematic priorities. The IRIG was chaired by Moazzam Malik (DG Africa), and the first IRIG meeting was held on 4 November 2021 at which Sir Iain Macleod, the FCDO's FoRB Board Sponsor at the time, and the Special Envoy for FoRB, Fiona Bruce MP, were in attendance. Despite these advances, this Recommendation appears to have '**encountered constraints during delivery**' as there is still little evidence of the IRIG's reach and effectiveness in relation to concrete action on issues concerning FoRB. Moreover, it is not within the FCDO's remit to offer advice on FoRB to other government departments.

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<sup>9</sup> Rehman Chishti and Knox Thames, 'Trans-Atlantic Efforts Advance Freedom of Religion' (10 May 2020), available at: <https://www.newsweek.com/trans-atlantic-efforts-advance-freedom-religion-opinion-1535995>.

### ***2.1.4 Recruitment***

Recommendation 15 addresses a number of matters concerning the recruitment of local staff. The FCDO reports that it continues to comply with UK and local employment law to ensure that principles of diversity and inclusion are part of all in-country recruitment campaigns. Therefore, the first element of Recommendation 15 is **‘in the process of being delivered’**. Posts have referred to their ensuring that local staff recruited to undertake face-to-face work with survivors of conflict have the requisite levels of awareness and sensitivity to work effectively with members of marginalised or vulnerable communities. This, however, may fall short of the aim of the Recommendation, which appears to be to encourage the employment of staff from religious or belief minorities, when it is appropriate, safe and possible to achieve in accordance with local employment law. While the feasibility of such an approach has been assessed with Human Resources at Headquarters level, the potential for new avenues for the implementation of the Recommendation has not been explored fully at the post level. The second element of Recommendation 15 therefore appears to have **‘encountered constraints during delivery’**.

### ***2.1.5 Cross-governmental Approach***

#### ***2.1.5.1 Scale of Persecution***

Recommendation 18 calls for the ‘Foreign Secretary, in close co-operation with the Special Envoy on FoRB, to convene ministers across government to agree on a consistent international approach to FoRB ultimately to establish a standard FoRB Scale of Persecution (to include discrimination through to extreme violence) to be used across government departments’.

A Scale of Persecution (Scale) has been developed to assist officials in identifying serious FoRB violations and is available on the FoRB page on the FCDO Intranet. Therefore, this aspect of Recommendation 18 has reached an **‘advanced stage of delivery’**. However, there appears to be limited evidence of its use operationally, which indicates that further efforts to increase engagement with this tool, particularly to clarify its purpose, is necessary. While some posts had heard of the Scale and found it helpful, many others remained unaware of it.

The Recommendation also contemplates use of the Scale across government departments. It is understood that the Scale has been shared with Home Office officials, and preparations are underway to share it with ministers across government now that ministerial approval has been granted. Its use is also set to be mainstreamed across departments through its inclusion in training modules on FoRB. Therefore, this aspect of Recommendation 18 is **‘in the process of being delivered’**.

#### ***2.1.5.2 Other public authorities and a Cabinet meeting***

Recommendation 21 also contemplates cross-governmental action. Referring to the Terms of Reference for the Review, that ‘other public authorities may wish to take note of the points of learning’, this Recommendation calls for the Foreign Secretary to ‘write to ministerial counterparts in those authorities’ and ‘request a FoRB-focussed discussion at a future full Cabinet meeting’. The two main aspects of Recommendation 21 are in different stages of implementation. As regards the first aspect of the Recommendation, the former Foreign Secretary Jeremy Hunt MP wrote to Prime Minister Theresa May in July 2019, and copied National Security Council members, encouraging them to take note of the Review. It is understood that the FCDO has shared advice in a further letter to governmental counterparts setting out learning from the Review and encouraging their engagement in the July 2022 FoRB

Ministerial Conference. Thus, this component of the Recommendation appears to be **‘in the process of being delivered’**.

The second element of the Recommendation calls for a FoRB-focussed discussion at a full Cabinet meeting. Since the matters which the Recommendation proposed should be discussed at such a meeting fell within FCDO areas of lead responsibility, the FCDO takes the view that it would be more appropriate to draw this to the attention of other departments directly, in writing, rather than through a Cabinet level discussion. As a result, it appears that **‘no substantial action has been taken to date’** with respect to the specific requirement of this Recommendation that a Cabinet meeting be requested. However, Recommendation 21(a), (b) and (c) have been taken forward in other ways. So as regards Recommendation 21(a), (b) and (c) **‘an alternative approach’** to achieving the underlying objective has been adopted.

### *2.1.5.3 Supporting International Days*

Recommendation 19 meanwhile calls for the FCDO to lead on and invite cross-government action in support of the UN International Day Commemorating the Victims of Acts of Violence Based on Religion or Belief annually on 22 August, and initiatives such as Red Wednesday in support of Persecuted Christians.<sup>10</sup> The FCDO has led on the commemoration of key FoRB-related international days, invited other government departments to engage in similar commemorations, engaged with various initiatives in the UK and in multilateral organisations, and shared messages on social media. FCDO Ministers and the Special Envoys for FoRB have also made FoRB announcements, attended events and engaged civil society around these days.

To mark the UN International Day Commemorating the Victims of Acts of Violence Based on Religion or Belief in 2019, it is understood that Lord Tariq Ahmad of Wimbledon delivered a pre-recorded message to the UN General Assembly reiterating the UK’s solidarity in standing for those affected by FoRB related violence, and the John Bunyan funding stream was also announced.<sup>11</sup> Some interviewees reported disappointment that there was no government-led public event to mark this International Day in 2020 and 2021. It was reported that the 2021 event was organised by the Special Envoy’s office.

To mark Red Wednesday in 2019, the FCO, DFID, Home Office, Ministry of Housing, Communities and Local Government (MHCLG), and Department for Environment, Food and Rural Affairs (DEFRA) lit their estates, and the FCDO estate was lit again in 2020 and 2021. On 17 November 2020, Lord Ahmad launched the Declaration of Humanity by leaders of faith and leaders of belief,<sup>12</sup> and on 24 November

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<sup>10</sup> FCO, ‘Human Rights and Democracy: The 2020 Foreign and Commonwealth Development Office report’ (July 2021), available at:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/999607/Human\\_Rights\\_and\\_Democracy\\_the\\_2020\\_Foreign\\_Commonwealth\\_Development\\_Office\\_report.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/999607/Human_Rights_and_Democracy_the_2020_Foreign_Commonwealth_Development_Office_report.pdf).

FCO, ‘Human Rights and Democracy: The 2019 Foreign and Commonwealth Office Report’ (July 2020), available at:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/902494/FCO14\\_14\\_FCO\\_AHRR\\_2019\\_-\\_accessible.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/902494/FCO14_14_FCO_AHRR_2019_-_accessible.pdf).

<sup>11</sup> FCO and Lord Ahmad of Wimbledon, ‘PM underlines UK’s commitment to freedom of religion or belief’ (22 August 2019), available at: <https://www.gov.uk/government/news/pm-underlines-uks-commitment-to-freedom-of-religion-or-belief>.

<sup>12</sup> FCDO and Preventing Sexual Violence in Conflict Initiative, ‘Declaration of humanity by leaders of faith and leaders of belief’ (17 November 2020), available at: <https://www.gov.uk/government/publications/declaration-of-humanity-by-leaders-of-faith-and-leaders-of-belief>

2021, he hosted an event with civil society groups in the FCDO. Considering the above, Recommendation 19 is **‘in the process of being delivered’**.

### ***2.1.6 ‘Arm’s length’ Bodies***

Recommendation 10, which calls for the FCDO to write to FCDO-funded ‘arm’s length’ bodies (ALBs) to encourage them to consider developing an appropriate approach to FoRB appears to have reached an **‘advanced stage of delivery’**. ALBs including the Westminster Foundation for Democracy, Wilton Park, and British Council were approached by the FCDO in October 2019 and invited to develop their own approach to FoRB.<sup>13</sup> A number of initiatives were launched with a view to operationalising appropriate approaches to FoRB among these ALBs. For instance, in February 2020, the FCO and Wilton Park held a joint conference on Fostering Social Cohesion in Nigeria.<sup>14</sup> However, it is not clear whether there are plans to build on these for sustained delivery or assessing outcomes. Some interviewees reported having had higher expectations for concrete outcomes from these ALB initiatives.

## **2.2 Mechanisms**

### ***2.2.1 Atrocity Crimes***

Recommendation 7 is **‘in the process of being delivered’** through a range of promising initiatives. The FCDO has, recently, initiated new early warning mechanisms to identify countries at risk of instability, conflict, and atrocities. There are also examples of diplomatic engagement with a view to de-escalating tensions and resolving disputes in specific contexts, alongside development and programmatic support with the aim of addressing root causes of conflict.

FoRB has been included as a factor in ongoing reporting and analyses and has been considered alongside other relevant conflict and violence risk factors. However, a dedicated early warning mechanism that focuses on FoRB-related conflict has not been developed despite the broader context of the Recommendation appearing to contemplate this. Some interviewees observed that this Recommendation could not be advanced in the absence of additional specific mechanisms focused on the assessment of atrocity crimes outside of contexts of instability and conflict.

Recommendation 7 also calls for the UK to be willing to make public statements condemning atrocities. The UK has done so on several occasions, thus demonstrating that it has the capacity to do so. On this basis, this aspect of Recommendation 7 has reached an **‘advanced stage of delivery’**. It is important that the capacity that has been developed is fully utilised.

### ***2.2.2 Sanctions***

Recommendation 8, which calls for the UK to ‘[b]e prepared to impose sanctions against perpetrators of FoRB abuses’, has reached **‘an advanced stage of delivery’**. When the Global Human Rights Sanctions Regime was announced, it was noted that individuals or organisations could be targeted due to violations

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<sup>13</sup> A similar letter was also extended to the BBC. Arguably, this goes towards fulfilling elements of Recommendation 21(f).

<sup>14</sup> Wilton Park, ‘Fostering Social Cohesion in Nigeria (WP1752)’, available at: <https://www.wiltonpark.org.uk/event/wp1752/>.

and abuses on the grounds of religion or belief.<sup>15</sup> Subsequently, the FCDO has imposed a number of sanctions against perpetrators of FoRB abuses. Sanctions have been announced against Myanmar generals (July 2020),<sup>16</sup> perpetrators of gross human rights violations against the Uyghurs in China and other minorities in Xinjiang (March 2021),<sup>17</sup> and Furqan Bangalzai (December 2021).<sup>18</sup> Although FoRB was not specifically mentioned in the announcements, the FCDO's general human rights commitments mean that sanctions have been used in relation to FoRB violations.

### ***2.2.3 John Bunyan Fund***

The 'John Bunyan' FoRB stream within the FCDO Magna Carta Fund has been established.<sup>19</sup> Therefore, Recommendation 9 has reached '**an advanced stage of delivery**'. The John Bunyan Fund is dedicated to providing assistance to individuals persecuted on the grounds of their religion or belief and, since its launch in August 2019, the FCDO has received bids and funded a range of projects and programmes. In 2019-2020, 15 projects were funded, receiving around £140,000 in total and, in 2020-2021, £100,000 was allocated as fewer projects were funded due to Covid-19 restrictions and the shorter delivery period.<sup>20</sup> In 2021-2022, the John Bunyan FoRB stream was used by posts to implement FoRB strategies in-country. Interviewees emphasised that this fund needed to be continued in order to allow longer term work on advancing FoRB to be realised.

## **2.3 Research and Training**

### ***2.3.1 Gathering Information and Data on FoRB***

Recommendation 4 calls for 'the development of appropriate mechanisms, with international partners, using external sources as required, to gather reliable information and data on FoRB to better inform the development of international policy'. The Assessment Team notes that FoRB is not a data-rich field and acquiring such material on FoRB is not without legitimate problems. The FCDO has a broad range of relationships with a variety of FoRB actors and uses a variety of methodologies to acquire accurate information and data to better inform the development of international policy. The FCDO reports that, along with the Special Envoy, it uses established mechanisms e.g., the International Contact Group (ICG)

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<sup>15</sup> FCDO and The Rt Hon Dominic Raab MP, 'UK announces first sanctions under new global human rights regime' (6 July 2020), available at: <https://www.gov.uk/government/news/uk-announces-first-sanctions-under-new-global-human-rights-regime>.

<sup>16</sup> Ibid.

<sup>17</sup> FCDO and The Rt Hon Dominic Raab MP, 'UK sanctions perpetrators of gross human rights violations in Xinjiang, alongside EU, Canada and US' (22 March 2021) available at: <https://www.gov.uk/government/news/uk-sanctions-perpetrators-of-gross-human-rights-violations-in-xinjiang-alongside-eu-canada-and-us>.

<sup>18</sup> FCDO and Lord Ahmad of Wimbledon, 'New UK sanctions target human rights violations and abuses in Myanmar and Pakistan' (10 December 2021) available at: <https://www.gov.uk/government/news/new-uk-sanctions-target-human-rights-violations-and-abuses-in-myanmar-and-pakistan>.

<sup>19</sup> FCO, 'The John Bunyan Bund for Freedom of Religion or Belief: call for bids' (22 August 2019), available at: <https://www.gov.uk/government/publications/john-bunyan-fund-for-freedom-of-religion-and-belief-call-for-bids>

<sup>20</sup> UK Parliament, 'Written questions, answers and statements. John Bunyan Fund for Freedom of Religion or Belief. Question for Foreign, Commonwealth and Development Office, UIN 104090, tabled 15 October 2020, answered on 20 October 2020', available at: <https://questions-statements.parliament.uk/written-questions/detail/2020-10-15/104090>.

on FoRB,<sup>21</sup> and the IRFBA (which has a task force that examines data) to share information. The FCDO has also funded the Religious Freedom Institute (RFI) to develop a SMART (Simple, Meaningful, Accessible, Reliable and Timely) data-gathering model.<sup>22</sup> Recommendation 4 is, therefore, **‘in the process of being delivered’**.<sup>23</sup>

### ***2.3.2 Bolstering Research into FoRB***

Recommendation 5 calls for research to be bolstered ‘into the critical intersection between FoRB and minority rights with both broader human rights issues’ and other critical concerns for the FCDO, ‘recognising the potential for religious identity to be a key marker of vulnerability’. It also calls for such research to be used to ‘articulate FoRB-focussed policies to address these issues’. UK Aid Connect, the Coalition for Religious Equality and Inclusive Development (CREID)<sup>24</sup> and the Oxford FoRB Leadership Network (FoRBLN)<sup>25</sup> have received funding to conduct research on FoRB-related issues. These research programmes predate the Review.<sup>26</sup> The operative term of Recommendation 5 is, therefore, ‘bolster’, which reflects a call to strengthen research into FoRB.

On the one hand, some aspects of Recommendation 5 are currently **‘in the process of being delivered’**. On the other hand, as some interviewees noted, HMG funding for such research has been cut. It was observed, however, that cuts were seen across a wide range of developmental and human rights programming, and FoRB-related research encountered comparatively lower cuts.

The research produced through these initiatives is yet to feed into the articulation of FoRB-focussed policy. The FCDO FoRB Team has taken important steps to amplify the research through internal channels of communication and, in some instances, posts have engaged with the CREID research. Generally, however, posts have tended to use alternative analytical material provided either centrally by FCDO research analysts or developed by the posts themselves. Therefore, achieving some objectives of Recommendation 5 has **‘involved an alternative approach’**.

Research projects have also been supported through the John Bunyan Fund. Meanwhile, the FCDO has supported a project with the Stimson Centre which examined UN responses to trends in violence based on religion or belief.<sup>27</sup>

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<sup>21</sup> Government of Canada, ‘International Contact Group on Freedom of Religion or Belief’ (2020), available at: [https://www.international.gc.ca/world-monde/issues\\_development-enjeux\\_developpement/human\\_rights-droits\\_homme/freedom-religion-liberte-group\\_groupe.aspx?lang=eng](https://www.international.gc.ca/world-monde/issues_development-enjeux_developpement/human_rights-droits_homme/freedom-religion-liberte-group_groupe.aspx?lang=eng)

<sup>22</sup> Religious Freedom Institute, ‘SMART Survey Overview’ (2020), available at: [https://static1.squarespace.com/static/57052f155559869b68a4f0e6/t/616d88335f3de054e31883b3/1634568243239/FORIS\\_SMART\\_Survey.pdf](https://static1.squarespace.com/static/57052f155559869b68a4f0e6/t/616d88335f3de054e31883b3/1634568243239/FORIS_SMART_Survey.pdf).

<sup>23</sup> For comments relating to information and data provided by civil society organisations, please see 2.4.3.3.

<sup>24</sup> Institute of Development Studies, CREID (2022), available at: <https://www.ids.ac.uk/programme-and-centre/creid/>.

<sup>25</sup> Oxford FoRB Leadership Network (FoRBLN), available at: <https://forbln.net/>.

<sup>26</sup> See e.g., Mariz Tadros, ‘Four considerations in response to the Bishop of Truro’s independent review on the persecution of Christians’ (11 July 2019), available at: <https://www.ids.ac.uk/opinions/four-considerations-in-response-to-the-bishop-of-truros-independent-review-on-the-persecution-of-christians/>.

<sup>27</sup> Aditi Gorur and Julie Gregory, *Violence Based on Religion or Belief: Taking Action at the United Nations* (Stimson Center, January 2021), available at: <https://stimson.org/wp-content/uploads/2021/01/PCIC-issue-brief-violence.pdf>.

### 2.3.3 Training

#### 2.3.3.1 FoRB training

The first part of Recommendation 11 calls on the FCDO to ‘[e]nsure that both general and contextual training in religious literacy and belief dynamics...is undertaken in all roles where this understanding is important’. To address this part of the Recommendation, significant work has been done to develop new training modules in consultation with stakeholders. The Assessment Team notes that the meaning of the term ‘religious literacy’ is contested and developing training modules for the specific purpose of enhancing religious literacy is a challenging endeavour. The FCDO has built on this Recommendation, as it does not specifically call for the development of new training units. The FCDO has pursued the development of the training units with determination. The goal intended in Recommendation 11 is, therefore, **‘in the process of being delivered’**.

A core training unit, entitled ‘Religion for International Engagement’, which aims to articulate why an understanding of FoRB is essential to the work of FCDO staff, was launched in July 2021. Over 100 staff took part (remotely) in the training launch event, attended by Lord Ahmad and the Special Envoy, Fiona Bruce MP. The core training unit is now on the FCDO Intranet and is available to all staff. Thus far, it has been downloaded almost 200 times, and PDF copies of the unit have been emailed to staff in response to requests.

The 2020 Annual Report stated that delivering the core unit to FCDO staff was a priority for 2021. However, uptake across the FCDO has been slow. The Assessment Team recognises that the delivery of the training was impacted by Covid-19 restrictions and considerable changes in terms of the organisational structure as a result of the DFID merger.

The aspect of Recommendation 11 that contemplates mandatory religious diversity and literacy e-training has encountered some **‘constraints during delivery’**. The training is currently not mandatory, as the FCDO has determined that making such training mandatory is not feasible. Instead, the core training unit has been categorised as ‘highly recommended’ and staff members are accordingly encouraged to undergo training before or at the start of their deployment, and have access to it at any point.

It was unclear as to whether the importance of the training has been clearly communicated to staff. For example, levels of engagement with the core unit among staff at desk and post varied considerably. Some FCDO staff interviewed were unaware of the core unit, others were aware of it but had not completed the training (but expressed an intention to do so in the future when time permits), and only a few had undertaken the training. Where training has taken place, it has usually taken place during deployment at post rather than before deployment or at the start of deployment, as Recommendation 11 sets out.

In terms of feedback, staff members who completed the core unit reported its general value, and the development of a core unit has largely been positively received by stakeholders, including civil society organisations.<sup>28</sup> However, some interviewees at post observed that standardised training has limited benefit in terms of generating deeper knowledge and understanding of specific country contexts. Some

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<sup>28</sup> See the response to Lord Ahmad’s tweet following the launch of the core training unit, Lord (Tariq) Ahmad of Wimbledon (@tariqahmadbt), ‘Today we have launched @FCDOGovUK’s new “Religion for International Engagement” training offer for all our staff...’ (*Twitter*, 20 July 2021, 4.59 pm), available at: <https://twitter.com/tariqahmadbt/status/1417514626011602945>.

posts reported that they have developed their own bespoke training materials, and others reported that they have developed deeper knowledge and understanding of specific country contexts (including religious literacy and belief dynamics) through research and analysis, and through engagement with local stakeholders, rather than through standardised training. The Assessment Team was impressed with the level of religion or belief, and FoRB, knowledge and sensitivity demonstrated by a number of posts regarding their contexts.

Religion is also covered as part of other training units (e.g., Middle East and South Asia training). A training unit on minorities is in the late stages of production, and further specific training is in development. Training sessions have also been offered on FoRB, and posts have found these useful.

### *2.3.3.2 FoRB Toolkit*

Recommendation 11 also makes reference to the FoRB Toolkit, which was produced in 2009 and disseminated among staff at training events and at posts, and made available online a few years later. The Toolkit was updated in 2016 for the FCO conference on preventing violent extremism, building inclusive societies and FoRB,<sup>29</sup> and it was distributed to conference participants and, again, to staff at posts. Recently, this Toolkit has been referenced in the core unit ‘Religion and International Engagement’ and is available on the FCDO Intranet and on gov.uk.<sup>30</sup> Despite the FoRB Toolkit being a long-standing FCDO resource, some posts remain unaware of its existence, and those that demonstrated awareness of it did not generally appear to be using it operationally. This is somewhat surprising given that the Toolkit is a foundational document that is intended to equip FCDO staff to engage with FoRB. While this aspect of Recommendation 11 is, ‘**in the process of being delivered**’, the delivery of the Toolkit has been an ongoing issue since 2009.

In terms of feedback on the usefulness of the Toolkit, none of the posts interviewed reported that the Toolkit was unhelpful. Some reflected that it was a useful document in setting out a foundation on FoRB and functioned as a helpful reference tool for staff at desk and post.

### *2.3.3.3 Atrocity training*

In 2021, an Atrocity Response training module was made available to all FCDO staff, and cross-governmental training was provided for 23 people. However, the uptake with respect to this training appears to be slow.

## **2.4 Engagement**

### ***2.4.1 Multilateral Engagement on FoRB***

#### *2.4.1.1 Championing FoRB*

Recommendation 2 calls for the UK to be ‘the global leader in championing FoRB, ensuring it is given due priority in the UK’s engagement in multilateral institutions’. The UK has articulated an aspiration to

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<sup>29</sup> FCO and The Rt Hon Baroness Anelay of St Johns DBE, ‘FCO leads global action on freedom of religion’ (19 October 2016), available at: <https://www.gov.uk/government/news/fco-leads-global-action-on-freedom-of-religion>.

<sup>30</sup> FCO, ‘Freedom of Religion or Belief Toolkit’, available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/561516/Freedom\\_of\\_Religion\\_or\\_Belief\\_Toolkit\\_-\\_2016.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/561516/Freedom_of_Religion_or_Belief_Toolkit_-_2016.pdf).

be a global leader in championing FoRB and has engaged multilaterally on FoRB at the UNHRC, OSCE and COE. Recommendation 2, therefore, is ‘**at an advanced stage of delivery**’.

In terms of engagement with the UNHRC, the UK is an active member, and UK statements on FoRB have been issued. For example, in June 2021 a joint statement on the plight of Uyghur Muslims in Xinjiang was delivered,<sup>31</sup> following an earlier joint statement at the UN General Assembly Third Committee, in which the UK raised concerns alongside 38 other countries about the situation in Xinjiang and Tibet.<sup>32</sup> In March 2021, the UK, delivered a statement to the HRC on FoRB during the Interactive Dialogue with the Special Rapporteur on freedom of religion or belief, in which concerns were expressed about the impact that Sri Lanka’s mandatory cremation policy during Covid-19 had on Muslims and Christians,<sup>33</sup> and more recently, in March 2022, the UK delivered a Statement on the Democratic People’s Republic of Korea (DPRK) in which the lack of FoRB in the country was referenced.<sup>34</sup>

The UK also regularly highlights its commitment to FoRB in UN debates on the subject. In the UK’s HRC45 Item 4 statement on China in September 2020, restrictions on religion were noted,<sup>35</sup> and in March 2022, the UK’s HRC49 Item 4 statement outlined concerns about human rights violations in Russia, China, Afghanistan and Egypt, and FoRB concerns were raised in relation to Tibet and Afghanistan.<sup>36</sup>

The UK has made a total of 33 recommendations that included FoRB across three cycles of the Universal Periodic Review (UPR).<sup>37</sup> This is the joint eighth highest total among the states in the UN’s 29-member electoral group of ‘Western Europe and other States’. The UK was ranked joint fourth highest in the first cycle of the UPR (2008-2012) with 14 recommendations. Its ranking slipped in the second cycle (2012-2016) to joint twelfth position but has reached joint eighth position in the third cycle (2017-2021).<sup>38</sup> To the extent that Recommendation 2(a) calls for the UK to advocate for FoRB in the UNHRC UPR process, it can be regarded to be in an ‘**advanced stage of delivery**’.

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<sup>31</sup> UK Mission to the WTO, UN and Other International Organisations (Geneva), ‘UN Human Rights Council 47: Joint statement on the human rights situation in Xinjiang’ (22 June 2021), available at: <https://www.gov.uk/government/news/un-human-rights-council-47-joint-statement-on-the-human-rights-situation-in-xinjiang>.

<sup>32</sup> FCO and Karen Pierce DCMG, ‘Joint Statement on Human Rights Violations and Abuses in Xinjiang’, (29 October 2019), available at: <https://www.gov.uk/government/speeches/joint-statement-on-xinjiang>.

<sup>33</sup> FCDO and Rita French, ‘UN Human Rights Council 46: UK statement on freedom of religion or belief’ (8 March 2021), available at: <https://www.gov.uk/government/speeches/un-human-rights-council-46-uk-statement-on-freedom-of-religion-and-belief>.

<sup>34</sup> FCDO and Rita French, ‘UN Human Rights Council 49: UK statement for the interactive dialogue on the human rights situation in the Democratic People's Republic of Korea’, (21 March 2022), available at: <https://www.gov.uk/government/speeches/un-human-rights-council-49-uk-statement-for-the-interactive-dialogue-on-the-human-rights-situation-in-the-democratic-peoples-republic-of-korea>.

<sup>35</sup> FCDO and Lord Ahmad of Wimbledon, ‘UN Human Rights Council 45: UK statement on China for item 4 general debate’ (25 September 2020), available at: <https://www.gov.uk/government/speeches/un-human-rights-council-45-uk-statement-for-the-item-4-general-debate>.

<sup>36</sup> FCDO and Simon Manley CMG, ‘UN Human Rights Council 49: UK statement for the Item 4 General Debate’ (21 March 2022), available at: <https://www.gov.uk/government/speeches/un-human-rights-council-49-uk-statement-for-the-item-4-general-debate>.

<sup>37</sup> UPR Info Database, available at: <https://upr-info-database.uwazi.io/>.

<sup>38</sup> USA and Turkey are included in this count as they are regarded to be WEOG for electoral purposes, see UN Department for General Assembly and Conference Management, ‘Regional groups of Member States’, available at: <https://www.un.org/dgacm/en/content/regional-groups>.

At the OSCE, the UK has consistently supported FoRB. For instance, the UK Delegation has delivered statements calling on Russia to end the persecution of Jehovah's Witnesses and uphold FoRB.<sup>39</sup> In May 2021, the G7 presidency was used to agree on FoRB language in the communique for the first time.<sup>40</sup> Additionally, in 2020, the UK co-founded IRFBA,<sup>41</sup> and over the past two years the UK has signed a number of IRFBA statements raising FoRB concerns.<sup>42</sup> In 2022, the Special Envoy on FoRB was approached to become Chair of IRFBA and is currently serving in this capacity.

In November 2020, Lord Ahmad addressed the Ministerial Conference to Advance FoRB, hosted by Poland,<sup>43</sup> and this year, on 5-6 July 2022, the UK will host the Ministerial Conference on FoRB, which is a reflection of UK leadership in this area.<sup>44</sup>

#### *2.4.1.2 Security Council resolution*

Recommendation 20 calls for the FCDO 'to use the United Kingdom's position as a Permanent Member of the United Nations Security Council, to seek a Security Council Resolution to call on all governments in the MENA Region' to pursue Recommendation 20(a)-(c) in relation to Christians, and other faith minorities. Additionally, it calls for the FCO to 'consider taking a similar approach for other regions as appropriate'. The FCDO has '**encountered constraints during the delivery**' of this Recommendation. This Recommendation was always going to be a very difficult Recommendation to fulfil and has proved to be one of the most challenging Recommendations in the Review to implement. Nevertheless, the FCDO has pursued it with seriousness, and a significant amount of time, effort, and resources have been deployed in formulating and negotiating a possible Security Council resolution since April 2021. Despite setbacks, the FCDO continues to seek a resolution. The deadlock within the Security Council, however, may not shift in the short term. Accordingly, it is noted that there are opportunity costs to deploying political capital towards negotiating a FoRB-related resolution in a highly politicised forum such as the Security Council.

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<sup>39</sup> UK Delegation to the OSCE, 'Situation of Jehovah's Witnesses in the Russian Federation: UK Statement' (23 July 2020), available at: <https://www.gov.uk/government/news/situation-of-jehovahs-witnesses-in-the-russian-federation-uk-statement>.

FCO and Neil Bush, 'UK Statement on the situation of Jehovah's Witnesses in the Russian Federation' (12 March 2020), available at: <https://www.gov.uk/government/speeches/uk-statement-on-the-situation-of-jehovahs-witnesses-in-the-russian-federation>.

<sup>40</sup> FCDO, 'G7 Foreign and Development Ministers' Meeting, Communiqué, London, 5 May 2021' (5 May 2021), available at: <https://www.gov.uk/government/publications/g7-foreign-and-development-ministers-meeting-may-2021-communiqué/g7-foreign-and-development-ministers-meeting-communiqué-london-5-may-2021#iii--open-societies>.

<sup>41</sup> US Department of State, 'International Religious Freedom or Belief Alliance', available at: <https://www.state.gov/international-religious-freedom-or-belief-alliance/>.

<sup>42</sup> e.g., Australian Government, Department of Foreign Affairs and Trade, 'Joint Statement led by Brazil on the International Religious Freedom or Belief Alliance (22 September 2020)', available at: <https://www.dfat.gov.au/international-relations/joint-statement-led-brazil-international-religious-freedom-or-belief-alliance>; US Department of State, 'Covid and Religious Minorities Pandemic Statement' (20 August 2020), available at: <https://www.state.gov/covid-19-and-religious-minorities-pandemic-statement/>.

<sup>43</sup> See FCO, 'Human Rights and Democracy: The 2020 Foreign and Commonwealth Development Office report' (July 2021), available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/999607/Human\\_Rights\\_and\\_Democracy\\_the\\_2020\\_Foreign\\_Commonwealth\\_Development\\_Office\\_report.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/999607/Human_Rights_and_Democracy_the_2020_Foreign_Commonwealth_Development_Office_report.pdf).

<sup>44</sup> FCDO, The Rt Hon Elizabeth Truss MP and Lord Ahmad of Wimbledon, 'UK to host international conference to promote freedom of religion or belief next summer in London' (23 November 2021), available at: <https://www.gov.uk/government/news/uk-to-host-international-conference-to-promote-freedom-of-religion-or-belief-next-summer-in-london>.

## **2.4.2 In-country Engagement**

### **2.4.2.1 Reporting framework for posts**

The first element of Recommendation 12 calls for the establishment of a clear framework for reporting by posts. While a framework for reporting has been produced by the FCDO and has been disseminated, the framework appears to have had limited impact on reporting procedures by post in practice. Many posts interviewed were unaware of its existence, and generally, where posts were aware of it, they preferred to use previously established systems for reporting instead. This tendency was especially evident where specific reporting systems had matured over time. However, where reporting systems were still in development, the framework was highlighted as a useful tool for ensuring that FoRB remains a priority issue in reporting.

The majority of posts explained that FoRB is very much integrated into wider human rights reports to mission and desk rather than being reported on separately. On occasion, specific reports are requested by the Special Envoy for FoRB or Lord Ahmad. In response, diplomatic telegrams on FoRB are often produced. This first element of Recommendation 12 is, therefore, **‘in the process of being delivered’**.

The second element of Recommendation 12 calls for reporting by posts to include engagement with majority and minority religious leaders, local civil society and NGOs, plus engagement where appropriate with representatives of such diaspora communities in the UK. The majority of posts interviewed demonstrated a keen awareness of the importance of engaging with in-country actors, and a willingness to do so. Most posts reported on their engagement with minority and majority religious leaders, local civil society, and NGOs in-country on a regular basis. However, such engagement is often subject to operational constraints. The Assessment Team notes that the extent of engagement is greatly affected by the country context. While work is being done with all seriousness, the challenge is often significant. In some instances, the specific country context makes it virtually impossible for FCDO staff to engage such actors to a great extent in-country. This challenge is particularly evident where engagement with HMG would place actors at risk. Additionally, for various reasons, in-country actors may prefer to engage FCDO staff on a face-to-face basis, yet Covid-19 restrictions have limited such contact in recent times. Nevertheless, where engagement is, or has been, difficult, posts have reported that efforts were made to engage civil society organisations, UK-based diaspora communities, and individuals outside the Embassy setting. Achieving the objective of the second element of Recommendation 12 has, therefore, **‘involved an alternative approach’** that is context specific.

The third element of Recommendation 12 calls for the articulation of recommendations for action to be taken to support FoRB and counter abuses. Typically, such recommendations for action are made as part of regular reporting, particularly through the ‘next steps’ section of reports. The recommendations made are context-specific, and therefore vary considerably. In some instances, action such as lobbying is recommended, whereas, in others more discreet action is considered to be more effective. This element of Recommendation 12 has, therefore, reached **‘an advanced stage of delivery’**.

In terms of Recommendation 14, which calls for reporting on human rights to include Christian persecution, posts have advised that Christian persecution is included in the reporting process. FCDO human rights reporting, more generally, includes Christian persecution where it is relevant. For instance, it is included in the Human Rights and Democracy Annual Report, so this element of Recommendation

14, is ‘**in the process of being delivered**’.<sup>45</sup> In some instances, the FCDO chose to refer to ‘ethnic and religious minorities’ rather than to list Christian or other groups, as doing so might carry risks. However, some interviewees expressed concern that some reporting had failed to specifically include Christian persecution when making reference to a number of other specific religious groups, which led to a perception that there was a reluctance to include Christian persecution.

#### *2.4.2.2 Tailored responses to FoRB violations*

Recommendation 13 calls for tailored responses to FoRB violations to be developed and delivered at post level. Again, posts have demonstrated an awareness of the importance of producing responses appropriate to the situation. Posts have considerable autonomy in developing their FoRB approach, and such tailored responses reflect this autonomy. Where possible, posts engage in discussion with host governments and develop and deliver responses in the broader context of developing strategies for democratisation, development, and peacebuilding. Issues listed in Recommendation 13(a)-(h) are context-specific and time-bound, and as such, have been addressed to different extents by different posts. Therefore, this Recommendation is ‘**in the process of being delivered**’.

Recommendation 13(h) calls for investment in local FoRB capacity building on FoRB. Posts reported that such local capacity has been developed to some extent, and that such capacity has enabled posts to tailor their responses within specific country contexts. With respect to establishing a dedicated position on FoRB, the consistent message from posts is that it is important to embed FoRB work within a broader human rights agenda, and a dedicated FoRB position may have the unintended consequence of marginalising the work.<sup>46</sup>

#### *2.4.3 Civil Society Engagement*

##### *2.4.3.1 Naming Christian discrimination and persecution*

Recommendation 3 calls for the FCDO to ‘name the phenomenon of Christian discrimination and persecution and undertake work to identify its particular character alongside similar definitions for other religions, to better inform and develop tailored FCO policies to address these’. In addressing this recommendation, the FCDO drew upon the John Bunyan Fund to support a consultation process (led by HE Archbishop Angaelos and REFCEMI) with a number of Christian and other stakeholders. The resulting report concluded that a consensus on whether the issue should be named was not apparent. Consequently, the FCDO has not named the phenomenon of Christian discrimination and persecution. However, the FCDO’s position is that if the Christian community agrees on a term, then its use will be seriously considered. This element of the recommendation has, therefore, ‘**involved an alternative approach**’ to delivery.

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<sup>45</sup> FCO, ‘Human Rights and Democracy: The 2020 Foreign and Commonwealth Development Office report’ (July 2021), available at:  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/999607/Human\\_Rights\\_and\\_Democracy\\_the\\_2020\\_Foreign\\_Commonwealth\\_Development\\_Office\\_report.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/999607/Human_Rights_and_Democracy_the_2020_Foreign_Commonwealth_Development_Office_report.pdf).

FCO, ‘Human Rights and Democracy: The 2019 Foreign and Commonwealth Office Report’ (July 2020), available at:  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/902494/FCO14\\_14\\_FCO\\_AHRR\\_2019\\_-\\_accessible.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/902494/FCO14_14_FCO_AHRR_2019_-_accessible.pdf).

<sup>46</sup> Recommendation 13(h) gives the example of the ‘FoRB role in Colombo [*sic*]’. Our information suggests that in Colombo, Sri Lanka, FoRB work is carried out by an officer that covers minorities including religious, ethnic, linguistic, and sexual minorities.

It is noted that the term ‘Christianophobia’ has been used in numerous UN resolutions since 2003. To date, the UK has supported 32 UN General Assembly resolutions that have used this term and continues to do so. The FCDO also reported that it refers to Christian persecution alongside the persecution of other groups in speeches, written statements and the Annual Human Rights and Democracy Report.<sup>47</sup>

#### *2.4.3.2 Working group*

Recommendation 17 calls for the FCDO to convene a working group for government departments and civil society actors to engage on FoRB. A working group as envisaged by the recommendation has not been established, so **‘no substantial action has been taken, to date’** with respect to delivering the recommendation.

The Assessment Team, however, notes that a FoRB Forum was convened in July 2020 by the Bishop of Truro, the Rt Reverend Philip Mounstephen, and stakeholder organisations. It is a self-funded organisation comprising over 70 stakeholder organisations, guided by a Steering Group that includes civil society leaders from a range of religions or beliefs.<sup>48</sup> Initially, the FoRB Forum was chaired by the Bishop of Truro. It is now chaired by Mervyn Thomas CMG, founder of Christian Solidarity Worldwide (CSW).

There are different views among interviewees as to whether the FoRB Forum addresses Recommendation 17. Some interviewees were critical of the FCDO’s delay in establishing a working group as envisaged by the Recommendation. They suggest that now that the FoRB Forum has been established it would be inappropriate for the FCDO to establish a working group. Other interviewees, however, observed that a working group would be a useful forum for civil society to meaningfully engage the FCDO, and that such a working group would not duplicate the functioning of the FoRB Forum. Others suggested that ministerial attendance at this Forum may achieve the goal of engagement sought by Recommendation 17. Interviewees welcomed the attendance and engagement of the Special Envoy at the Forum.

#### *2.4.3.3 Evidence from civil society in reporting*

Given the level of engagement at post with local civil society, reporting from posts often takes into account evidence from civil society. As such, the element of Recommendation 14 which calls for FCDO reporting to take due account of evidence from civil society is **‘in the process of being delivered’**.

### **3. FoRB for All**

The Terms of Reference required the Assessment Team to consider the extent to which implementation of the Recommendations has supported the FCDO’s ‘FoRB for all’ policy priority. It is evident that the Review has made a significant contribution to making ‘FoRB for all’ an ongoing thematic priority within the human rights work of the FCDO. Additionally, it appears from the interviews conducted for this

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<sup>47</sup> For an example reference to Christian persecution in the Annual Human Rights and Democracy Report, see FCO, ‘Human Rights and Democracy: 2020 Foreign and Commonwealth Office report’ (8 July 2021), available at: <https://www.gov.uk/government/publications/human-rights-and-democracy-report-2020/human-rights-and-democracy-2020-foreign-commonwealth-development-office-report#chapter-1-human-rights-and-democracy-priority-themes>.

<sup>48</sup> UK Freedom of Religion or Belief Forum, ‘About’, available at <https://www.ukforbforum.org/about>.

assessment that Christian persecution features in their human rights work, and many reported that they are giving greater consideration to both Christian persecution and FoRB, more broadly, as a result of the Review. Generally, however, there was a strong sense among interviewees that significant ‘FoRB for all’ work was already being undertaken within the FCDO, especially at post level. So, to that extent, the Review has reinforced and endorsed existing approaches.

Some CSOs, and others, took a different view, considering that the original impetus for the Review and its Recommendations lay in the need to have an increased awareness of, and focus on, Christian persecution but that this focus had been subsumed by, and potentially lost within, the ‘FoRB for all’ focus. In this regard, the background to the Review needs consideration. The initial impetus for the Review lay in calls to prioritise responding to Christian persecution and discrimination. There were different perspectives among interviewees as to whether the gap in this area in the work of the FCDO/HMG prior to the Review was real or perceived. Before and after the launch of the Review, some religious and belief groups and civil society actors expressed reservations about according a priority focus to Christianity. For instance, the Church of England and the Catholic Bishops’ Conference of England and Wales made a joint submission emphasising the need to take a wide approach to the promotion of FoRB.<sup>49</sup>

Some interviewees noted that the general association of the Review with a Christianity-centric focus carried risks when working on FoRB related issues in-country. Posts and stakeholders had largely responded by understanding or reframing the Recommendations within the ‘FoRB for all’ policy priority. Therefore, attempts were made throughout the implementation process to mitigate potential negative consequences of the work of the FCDO being perceived as being overly Christianity-centric, including minimising any opportunity costs for the ‘FoRB for all’ policy as a result of prioritising this in the implementation of the Recommendations. It is, then, unsurprising that the FCDO’s overall approach to implementation has been largely consistent with the ‘FoRB for all’ policy priority. Interviewees noted that the Review has had an overall positive impact in terms of firmly placing FoRB on the FCDO’s agenda and prompting further prioritisation of FoRB within the FCDO’s human rights operations, while at the same time being cognisant of the need to also address FoRB violations concerning Christians.

## **4. Conclusions and Lessons Learnt**

There has been a positive overall response to the Recommendations, with active steps being taken towards implementing an overwhelming majority of them. However, some of those steps have been taken relatively recently.

The Assessment Team identified several lessons that may be learnt from the FCDO’s experience of implementing the Recommendations.

### **4.1 Alignment**

The Assessment Team observed that some aspects of the Recommendations were not fully aligned with the operational contexts of the FCDO as the main implementing department. In some instances, there

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<sup>49</sup> Catholic Bishops’ Conference of England and Wales and Church of England Submission to Independent Review of FCO support for persecuted Christians, available at: <https://www.archbishopofcanterbury.org/sites/abc/files/2019-04/Catholic%20Bishops%E2%80%99%20Conference%20of%20England%20and%20Wales%20and%20Church%20of%20England%20submission.pdf>.

was a lack of alignment between the intent of the Recommendations and the tools available to the FCDO to pursue them. For instance, expectations that the FCDO should lead on cross-governmental action where domestic action was contemplated faced the difficulty of the limited role of the FCDO in relation to domestic policy.

If such a large task were undertaken in the future, it would be helpful to ensure closer alignment and cultivation of relationships between the implementing institution and those developing and framing the recommendations to maximise the opportunities for delivery.

## **4.2 Delivery Strategy**

In implementing recommendations that seek to achieve far-reaching change, it would be useful to develop a comprehensive operational action plan, which identifies the strategies and measures that are required to pursue specific goals along with timeframes and indicators to support and track success. Such indicators should ideally be developed after consultation with the stakeholders. Such an inclusive approach may also enable a mutual sharing of expertise with regard to good practice in human rights diplomacy, which could contribute both to maximising efficiencies and managing expectations. This may be particularly relevant when combining advocacy on FoRB, or indeed on Christian persecution per se, with diplomacy to maintain stakeholder confidence through increased transparency and accountability.

Such an approach may have also aided SMART (Specific, Measurable, Achievable, Relevant, Time-bound) recommendations, allowing the recommendations that could have aided the overall delivery to have been prioritised at an earlier stage of the process. For example, considerable time and resources have been channelled into developing training materials. There has been an opportunity cost to this, and engagement with stakeholders and posts may have proven a better earlier focus in terms of resources and investment.

A comprehensive delivery strategy may have also aided a more integrated policy approach to mainstreaming FoRB. Such a policy approach would be useful in informing multilateral and bilateral level engagement. For example, a reference to FoRB in the announcements relating to sanctions would have made it clearer that the sanction was related to FoRB. The relevant Recommendation suggested that FoRB itself could result in sanctions even if other factors were not present.<sup>50</sup> There appears to be an opportunity for the Scale of Persecution to play a role here in highlighting to geographic desks instances in which sanctions might be a useful tool.

It is recognised that the implementation of the Recommendations is (necessarily) diffused. Yet it would have benefitted from more connectivity among those in the FCDO pursuing FoRB activities and advancing the Recommendations. One of the lessons that emerged from this assessment is the importance of framing policy recommendations in a cumulative manner where feasible, building on existing initiatives. It would also be important for such initiatives to build synergies rather than fragment efforts.

## **4.3 Engagement**

There also seems to have been scope for more structured engagement between the FCDO and stakeholders. Such engagement would have facilitated better understanding and contributed to better management of expectations. For example, such engagement may have contributed towards stakeholders

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<sup>50</sup> Please see 2.2.2.

gaining a more nuanced understanding of the operational realities of the FCDO, including the nature of the relationship between London-based roles and posts.

Some stakeholders felt that the FCDO's proactive engagement with them was insufficient and that the FCDO did not engage sufficiently with the information and data they provided. Stakeholders appear to be keen to be 'heard' by particular country desks especially where they see consistent patterns of gross FoRB violations. Understandably, there is an expectation that consistent patterns of gross human rights violations should lead to heightened and ongoing assessment by HMG concerning what opportunities for influence can be found. Instead, it was felt by many that the HMG position in some posts with well-established patterns of FoRB violations tends towards rigidity in their understanding and response. The Assessment Team observes that patterns of FoRB violations need ongoing attention and exploration of opportunities for effective engagement. Stronger ongoing dialogue between post, London and civil society can assist the exploration of options and greater understanding of the relevant operational contexts and options for making effective interventions. Overall, posts seemed to feel more empowered to act in relation to individual cases rather than where there were more generalised and established patterns of FoRB violations which reflected inter-communal tensions.

Another benefit of enhanced engagement is a deeper understanding that 'mainstreaming' FoRB within the FCDO's work across all thematic areas will not lead to diminishing the focus on FoRB. There is a perception among some stakeholders that FoRB should be 'singled out'. However, the consistent message from posts is that it is important to embed FoRB work within a broader human rights agenda. For instance, dedicated FoRB positions may have the unintended consequence of marginalising work on FoRB. The UK is fortunate to have an increasing number and range of actors interested in FoRB and this reservoir of interest can both inform and become better informed of wider FoRB, human rights and diplomatic realities through such engagement.

Many suggested that a FCDO-convened working group would be valuable to enhance engagement between the FCDO and civil society groups. This appears to have been a lost opportunity in terms of the delivery of the Recommendations.

The profile of religion in foreign policy is increasing in many countries as a response to rising threats to freedom of religion or belief around the world and growing concerns are being expressed in many countries for their governments to respond to these challenges. International legal obligations of states, and demonstrated good practice, highlight the importance of promoting freedom of religion or belief as a fundamental human right for all. However, achieving success in promoting FoRB for all requires unequivocal political leadership and commitment, adequate resources, peer-to-peer engagement, and trust-building.

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Overall, the implementation of the Recommendations has assisted in heightening awareness of FoRB for all, and the need to ensure that the persecution of Christians is addressed in as full a fashion as is the persecution of others. During the last three years, there have been many positive developments and initiatives undertaken to bring this about. However, there remains scope for further developments in order to ensure that the protection of FoRB for all becomes firmly embedded in the operational approach of the FCDO as a whole.

## Annex: Table of Recommendations

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| <p><b>Recommendation 1</b><br/>Ensure FoRB, based on UDHR Article 18, and Article 18 of ICCPR and Article 27 of ICCPR where applicable, alongside other human rights and values, is central to FCO operation and culture by developing a clear framework of core values that will underlie its operations, to include a specific commitment to the upholding of rights of members of minorities. Investigate the feasibility of establishing a Diplomatic Code to reflect these values and enshrine them in strategic and operational guidelines.</p> | <p>In the process of being delivered</p>                                   |
| <p><b>Recommendation 2</b><br/>Articulate an aspiration to be the global leader in championing FoRB, ensuring it is given due priority in the UK's engagement in multilateral institutions, focusing particularly on those most likely to have impact on religious persecution such as the UN Human Rights Council, OSCE and the Council of Europe. Engagement to include inter alia:</p>   | <p>Advanced stage of delivery</p>  |
| <p>a. An emphasis on FoRB based on Article 18 and 27 (UDHR, ICCPR), advocating this in the HRC Universal Periodic Review process as appropriate.</p>  | <p>Advanced stage of delivery</p>  |
| <p>b. Advocate that member states introduce a Special Envoy position for FoRB with a particular emphasis on members of religious minorities.</p>  | <p>An alternative approach to achieving the objective has been adopted</p> |
| <p><b>Recommendation 3</b><br/>Name the phenomenon of Christian discrimination and persecution and undertake work to identify its particular character alongside similar definitions for other religions, to better inform and develop tailored FCO policies to address these.</p>  | <p>An alternative approach to achieving the objective has been adopted</p> |
| <p><b>Recommendation 4</b><br/>Encourage the development of appropriate mechanisms, with international partners, using external sources as required, to gather reliable information and data on FoRB to better inform the development of international policy.</p>  | <p>In the process of being delivered</p>                                   |
| <p><b>Recommendation 5</b><br/>Bolster research into the critical intersection of FoRB and minority rights with both broader human rights issues (such as people trafficking, gender equality, gender based violence especially kidnapping, forced conversion and forced marriage) and other critical concerns for FCO such as security, economic activity, etc. recognising the potential for religious identity to be a key marker of vulnerability.</p>  | <p>In the process of being delivered</p>                                   |

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| Use such research to articulate FoRB-focussed policies to address these issues.   | An alternative approach to achieving the objective has been adopted  |
| <p><b>Recommendation 6</b></p> <p>Establish suitable instruments/ roles to monitor and implement such an approach, taking into consideration other international approaches</p> <p>... and specifically establishing [the role of Special Envoy on FoRB],</p> <p>...permanently, and in perpetuity, the role of Special Envoy on FoRB,</p> <p>... with appropriate resources and authority to work across FCO departments</p> <p>... supported by a DG level champion for FoRB.</p> | <p>Advanced stage of delivery</p> <p>No substantial action has been taken, to date, with respect to delivery</p> <p>Encountered constraints during delivery</p> <p>In the process of being delivered</p> |
| <p><b>Recommendation 7</b></p> <p>Ensure mechanisms are in place to facilitate an immediate response to atrocity crimes, including genocide, through setting up an early warning system, diplomacy to help resolve tensions and support to help with upstream prevention work.</p>  | In the process of being delivered  |
| Be willing to make public statements condemning such atrocities.  | Advanced stage of delivery   |
| <p><b>Recommendation 8</b></p> <p>Be prepared to impose sanctions against perpetrators of FoRB abuses.</p>  | Advanced stage of delivery   |
| <p><b>Recommendation 9</b></p> <p>Establish a John Bunyan FoRB stream within the FCO Magna Carta Fund.</p>  | Advanced stage of delivery   |
| <p><b>Recommendation 10</b></p> <p>The Foreign Secretary to write to FCO funded ‘arm’s length’ bodies to encourage them to consider developing an appropriate approach to FoRB.</p>   | Advanced stage of delivery   |
| <p><b>Recommendation 11</b></p> <p>Ensure that both general and contextual training in religious literacy and belief dynamics, including the FCO FoRB Tool Kit, is undertaken in all roles where this understanding is important (i.e., with other key FoRB players and contexts where FoRB is under threat), and to be undertaken before or at the start of each such deployment.</p>  | In the process of being delivered  |
| Subject to cost and value for money considerations, roll out to all staff mandatory religious diversity and literacy e-training.  | Encountered constraints during delivery  |

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| <p><b>Recommendation 12</b><br/>Establish a clear framework for reporting by Posts</p> <p>...to include engagement with majority and minority religious leaders, local civil society and NGOs, plus engagement where appropriate with representatives of such diaspora communities in the UK</p> <p>...with the articulation of consequent recommendations for action to be taken to support FoRB and counter abuses</p>  | <p>In the process of being delivered</p> <p>An alternative approach to achieving the objective has been adopted</p> <p>Advanced stage of delivery</p> |
| <p><b>Recommendation 13</b><br/>Develop and deliver tailored responses to FoRB violations at Post level, in discussion with host governments as appropriate, in the broader context of developing strategies for democratisation, development, and peace building, to include inter alia:</p> <ol style="list-style-type: none"> <li>a. Advocacy for religious protection</li> <li>b. Promotion of inclusive high quality education for all, including members of religious minorities</li> <li>c. Addressing of socio-economic issues</li> <li>d. Encouraging high-level acts of unity</li> <li>e. Preserving Christian and other cultural heritage in Armed Conflict (Hague Convention)</li> <li>f. Fostering social cohesion</li> <li>g. Ensure that such approaches are collaborative and locally owned by members of religious majorities and minorities and leaders of civil society so as inter alia to avoid ‘othering’ and unintentional victimisation.</li> <li>h. Invest in local FoRB capacity building to that end (cf. FoRB role in Columbo [<i>sic</i>]).</li> </ol> | <p>In the process of being delivered</p>  |
| <p><b>Recommendation 14</b><br/>Ensure FCO human rights reporting includes Christian persecution, where this is relevant. This will include the FCO Human Rights and Democracy Annual Report, and reporting from posts on human rights taking due account of evidence from civil society.</p>   | <p>In the process of being delivered</p>  |
| <p><b>Recommendation 15</b><br/>Continue to ensure diversity and inclusion principles are part of all in-country recruitment campaigns including for members of minorities.</p>   | <p>In the process of being delivered</p>  |
| <p>In countries where there is a need to recruit local staff to undertake face-to-face work with survivors of conflict, hiring managers should duly consider how to manage or reduce sensitivities of this work during the recruitment process.</p>   | <p>Encountered constraints during delivery</p>  |

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| <p><b>Recommendation 16</b></p> <p>The FCO to establish a Board chaired by the Director General champion for FoRB and supported by the FoRB team to advise cross-governmentally - in line with the Prime Minister's Special Envoy on FoRB's existing cross- governmental responsibilities - on the state of FoRB and rights for members of religious minorities globally and offer advice to other government departments as to how best to respond to the challenges presented.</p>   | <p>Encountered constraints during delivery</p>                                 |
| <p><b>Recommendation 17</b></p> <p>The FCO to convene a working group for government departments and civil society actors to engage on the issue.</p>  | <p>No substantial action has been taken, to date, with respect to delivery</p> |
| <p><b>Recommendation 18</b></p> <p>The Foreign Secretary, in close co-operation with the Prime Minister's Special Envoy on FoRB, to convene ministers across government to agree a consistent international approach to FoRB ultimately to establish a standard FoRB Scale of Persecution (to include discrimination through to extreme violence)</p> <p>...for use across government departments.</p>   | <p>Advanced stage of delivery</p> <p>In the process of being delivered</p>     |
| <p><b>Recommendation 19</b></p> <p>The FCO to lead on, and invite, cross-government action in support of the UN International Day Commemorating the Victims of Acts of Violence Based on Religion or Belief annually on the 22nd August and initiatives such as Red Wednesday in support of Persecuted Christians.</p>   | <p>In the process of being delivered</p>                                       |
| <p><b>Recommendation 20</b></p> <p>The FCO to use the United Kingdom's position, as a Permanent Member of the United Nations Security Council, to seek a Security Council Resolution to call on all governments in the MENA Region to:</p> <ol style="list-style-type: none"> <li>a. ensure the protection and security of Christians, and other faith minorities, in their respective countries;</li> <li>b. facilitate the establishment of security and protection arrangements for Christians, and other faith minorities, within the legal and governance structure of their respective countries;</li> <li>c. permit United Nations observers to monitor the protection and security arrangements for Christians and other faith minorities in their respective countries. FCO also to consider taking a similar approach for other regions as appropriate.</li> </ol> | <p>Encountered constraints during delivery</p>                                 |

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| <p><b>Recommendation 21</b></p> <p>Noting the wording of the Terms of Reference of the Independent Review that, ‘other public authorities may wish to take note of the points of learning’, the Foreign Secretary should write to ministerial counterparts in those authorities to encourage them to take note of the following areas</p>   | <p>In the process of being delivered</p>  |
| <p>The Foreign Secretary should request a FoRB-focussed discussion at a future full Cabinet meeting to consider, inter alia, the following:</p> <p>a. Where UK actions are delegated to international institutions/agencies (such as UNHCR) minority visibility among beneficiaries should be a priority. Humanitarian law mandating no ‘adverse distinction’ must not be used as a cover for making no distinctions at all and letting the majority community benefit disproportionately. The FCO, in its international engagement must resist any temptation to ‘outsource’ its obligations in this regard.</p> <p>b. FCO to champion the prosecution of ISIS perpetrators of sex crimes against Yazidi and Christian women, not only as terrorists.</p> <p>c. FCO to lead a cross-departmental evaluation and discussion of regional policy (for departments with an international focus) to recognise religious affiliation as a key vulnerability marker for members of religious minorities. In the light of the international observations identified in the course of this Independent Review regarding the negative consequences of the mantra of ‘need not creed’, active and urgent cross-governmental consideration must be given to rejecting this approach. The Foreign Secretary should reject the mantra in FCO foreign policy contexts entirely.</p> <p>d. Encourage government departments (with an international focus) to self evaluate their policies on FoRB to ensure that they are continually advancing it.</p> <p>e. Explore how social media strategies can promote FoRB and counter religious hate.</p> <p>f. Request both the World Service and the British Council to consider developing clear editorial / policy lines on this issue.</p> | <p>No substantial action has been taken, to date, with respect to delivering the Cabinet meeting</p> <p>As regards (a), (b) and (c), an alternative approach to achieving the underlying objective has been adopted</p> |
| <p><b>Recommendation 22</b></p> <p>All of these foreign policy recommendations to the Foreign Secretary should be reviewed independently in three years’ time.</p>  |   |