



HM Government

UNITED KINGDOM ANTI-CORRUPTION STRATEGY 2017-2022 YEAR 2 UPDATE



CONTENTS

Foreword by Minister of State for Security	3
Foreword by the Prime Minister's Anti-Corruption Champion	7
Introduction	9
Review 1: Reduce the insider threat in high risk domestic sectors	13
Review 2: The UK as an international finance centre	15
Review 3: Promote integrity across the public and private sector	19
Review 4: Reduce corruption in public procurement and grants	21
Review 5: Improve the business environment globally	23
Review 6: Work with other countries to combat corruption	27
Delivering our vision	31
Forward look – 2020	33
Corruption indicators	34
Annex B	45

FOREWORD

by Minister of State for Security

As we publish this Year 2 Update, we find ourselves in an unprecedented environment concerning the Coronavirus (COVID-19) pandemic which will inevitably pose new challenges in the fight against corruption, both in the immediate and longer term.

Against the backdrop of this uniquely challenging global environment, this Year 2 Update sets out the significant progress the UK made in 2019 on implementing the commitments in the Anti-Corruption Strategy.

Corruption and illicit finance make it easier for criminals to commit and profit from crime. They undermine our national security and prosperity and corrode trust in institutions. These threats enable serious and organised crime (including drugs, terrorism and fraud), and present threats at our borders. Bribery and weak anti-corruption laws stop British businesses competing on even terms in new markets, potentially undermining our position as an independent trading nation, now we have left the European Union. Perceptions of corruption and the spotlight being shone on elites playing by a different set of rules undermines trust in our nation. These threats are only heightened by the Coronavirus pandemic.

Both the Home Secretary and I are delighted that 2019 has demonstrated our drive to continue to deliver key successes in countering corruption alongside our commitment to tackle wider economic crime threats through the publication and delivery of the joint public and private Economic Crime Plan. We have made good progress in this endeavour. However, we want to continue to challenge Government to be more ambitious in tackling corruption.

This is a cross Government effort and here in the Home Office it includes continued implementation of the Asset Recovery Action Plan to recover and return assets stolen through corruption and it includes efforts to tackle gangs and serious organised criminals who use illicit finance as a means to carry out their activities. It also includes reforms to the money laundering system, through Suspicious Activity Report (SARs) reform, improving our law enforcement response and providing better information sharing – and we continue to enhance the capability of the National Crime Agency and the National Economic Crime Centre to meet the evolving threat. The use of new powers such as Unexplained Wealth Orders and Account Freezing Orders enable law enforcement to continue to identify and seize property and funds from people we suspect may have obtained them corruptly.



**The Right Honourable
James Brokenshire
MP**

We have strong domestic capabilities and a great record as a champion of anti-corruption efforts and the rules-based international system as this Year 2 Update shows. The unprecedented government spending required to combat the current crisis will present new challenges for us and opportunities for the corrupt to exploit any weaknesses in our systems. We need to remain vigilant, although I am delighted the progress made in the first two years of the Anti-Corruption Strategy strengthened our systems and made us more resilient. We cannot be complacent, however and need to continue to meet these challenges. I am determined to drive the agenda forward and do better to raise the UK standards even higher through continued implementation of the Anti-Corruption Strategy and seek new and ambitious ways to counter the evolving threat.

The Right Honourable James Brokenshire MP

FOREWORD

by the Prime Minister's Anti-Corruption Champion

First, an apology because we are late handing in our homework. This second yearly report was supposed to be out before Christmas, but a general election and then coronavirus have intervened. Nonetheless I hope this version is just as transparent as the first one, with details of our progress – good or bad – on each of the Anti-Corruption Strategy's 134 actions that were due to be completed in Year 2.

So how have we done? After Year 1 we were pretty much on track and Year 2 had fewer milestones to hit, but several of them involved introducing legislation which proved impossible in the gridlock of last year's Parliament. So we need to get on with the missing items briskly, to make up lost ground, as well as reforms to Companies House and more disclosure of who owns what land and property in our country. Normal life may seem to be on hold while everyone battles coronavirus, but kleptocrats and organised criminals won't have marked time during the pandemic. They will have seen it as a huge opportunity to make even more money while the rest of the world's attention was focused elsewhere. We will need to get back to business promptly once things return to normal. And beyond the 'to-do list' of actions in the Anti-Corruption Strategy, there is a broader agenda that we mustn't forget either. For example, our domestic anti-corruption debate is still heavily focused on the glossy wealth of international money laundering, so we mustn't neglect the equally-serious but grittier threats from criminals trying to win public contracts unfairly, or to smuggle drugs into prisons and people across borders.

More broadly still, Britain's departure from the EU presents an opportunity to show we are serious about being an engaged global citizen, strongly committed to a clean, fair, rules-based international system. A good example is our campaign to promote transparency in who owns and controls legal vehicles (like companies, partnerships and trusts) which can be misused for money laundering. We gathered steady support and momentum throughout 2019, with enthusiastic endorsement from international anti-corruption opinion formers and NGOs, and we now have a cohort of early-adopting countries who are signing up to deliver it. But that won't be enough on its own. For example, we have an opportunity in the new international trade deals we negotiate; strong anti-corruption measures in those treaties will help British exporters compete fairly around the world and show our leadership towards a cleaner international trading system, but weak ones will hobble or hamstring our work.



John Penrose MP

INTRODUCTION

In December 2017, we launched the first UK Anti-Corruption Strategy 2017-2022 to provide a framework to guide HM Government anti-corruption policies and actions. The Strategy aims to support:

National
Security

Prosperity

Trust in
institutions

This is the second annual Update which highlights progress made against our Strategy Commitments. In the Strategy's first year we built many of the foundations upon which subsequent activity would be based. This included scoping and research activity, securing funding and establishing new functions. This activity is highlighted in the Year 1 Update. The second year has built upon much of this activity but has also presented us with a number of challenges. This Year 2 Update shows that **we continue to make significant progress in implementing our Commitments** and highlights those areas where we have had a number of notable successes and those where there is more limited progress.

This Update provides detailed descriptions of activity across the Priority areas of the Strategy and focuses on a number of key areas; our multilateral work, our Prosperity Fund anti-corruption programme and our beneficial ownership campaign.

This Update covers the period up to and including 31 December 2019. Selected 2020 activity is mentioned in footnotes with a fuller explanation due in the Year 3 Update.

Strategic overview

2019 was a difficult year in the ongoing fight against corruption globally. High profile news stories highlighted instances of grand corruption, threats to the independence of judiciaries and the treatment of journalists investigating corruption. These events continue to remind us that, in some countries, corruption goes to the top and can ultimately undermine the full machinery of the state.

The UK experiences lower levels of corruption than many other countries, as shown in the new dashboard of international comparators annexed to this report. However, the UK continues to be vulnerable to corruption threats but is also at the forefront of efforts to tackle the problem, predominantly through implementation of the Anti-Corruption Strategy. We have achieved a great deal in relation to a number of our Strategy Commitments during 2019 reaching across government at a national and local level. These Commitments cover working with partners in other countries, in the private sector and in law enforcement. They range from the way we secure our border and our critical national infrastructure, how we protect our financial systems from abuse, how we tackle and prevent fraud or misuse of how we contract with our suppliers and how we promote our national prosperity.

Activity in 2019 is set out in detail in this Update, covering each of our Priority areas in turn. Highlights include:

- securing long-term funding for the Anti-Corruption Strategy for **prisons and probation** and the extensive work in the **defence sector, for example on getting access to the right kind of data and analysis to help us** tackle the threat posed by corrupt insiders;

- using **Unexplained Wealth Orders** and **Account Freezing Orders**, to highlight and seize property and bank accounts from people we suspect may have obtained them corruptly while;
- for the first time, our new Office of Financial Sanctions Implementation has punished companies for breaching **sanctions**;
- publishing an **Asset Recovery Action Plan** including how to recover and return assets stolen through corruption;
- reviewing the arrangements we have with our Overseas Territories and Crown Dependencies which allow our respective tax and law enforcement authorities to quickly, safely and securely receive information on who ultimately owns the companies they are investigating (known as **beneficial ownership**);
- using our expertise to **help other countries to transform their public procurement services**; and
- using the Prosperity Fund on a **global programme to help countries combat corruption**.

We committed to do more to tackle economic crime across the public and private sectors through the new Economic Crime Plan. This Plan sets out 52 commitments aimed at supporting seven strategic priorities which are closely linked with implementation of the Anti-Corruption Strategy. We have invested over £48 million to support the National Crime Agency’s illicit finance work, including investing in the National Economic Crime Centre to increase the numbers of investigators and improves our responses to suspicious activity. We have increased our capability to investigate fraud at a regional and local level and continuing to reform the ways that our regulated companies can report suspicious activity. The Plan also focuses on the improving our own systems including reforming Companies House, publishing details of those from overseas who own property in the UK and reform of our regime for limited partnerships.

We have established a **new network of serious and organised crime policy officers** who meet quarterly to agree, develop, deliver and report on a more strategic approach from our Embassies to tackling SOC overseas covering over 80 countries. This will complement the operational work of existing law enforcement networks. The feedback we have received from these officers is that corruption is a major concern due to the clear links in practice between corruption and serious and organised crime.

How are we doing?

The Strategy contains 134 Commitments, 17 of which were due by the end of Year 2 (including four Commitments due not fully implemented by the end of Year 1).

	Fully Implemented	Partially Implemented	Not implemented	Implemented by other means	Total
2018	25	2	2	1	30
2019	9	2	6 ¹	0	17

More details can be found in the following reviews of the Priority areas. The annexed matrix highlights **progress against each of the 134 Commitments**. These show that:

- 117 Commitments are rated “green” for completed or on track,

¹ Two of these Commitments have now been fully implemented in 2020 and will be reported on in the Year 3 Update.

- eight are rated “red” for off track with deadline(s) expected to be missed and/or with serious risk to delivery; and
- nine are rated “amber” for progressing with risk that deadline(s) may be missed and/or with some risk to deliver.

Pressure on Parliamentary time in 2019 prevented required legislation being introduced. This accounts for a number of the “red” and “amber” ratings. We are, however, committed to introducing them when Parliamentary time allows. The immediate re-appointment of John Penrose as the new Prime Minister’s Champion in July 2019 was an important indicator of continued commitment to this agenda.

Although 2019 has been challenging in many ways, we are confident in the progress we have made and will continue our efforts in the coming years. As we become an independent trading nation in 2020, there are new opportunities to tackle corruption. We will be forming partnerships with old allies and new friends through **free trade** agreements with a chance to introduce world leading anti-corruption measures.

We also plan to drive forward with our Strategy implementation, in particular, to **expand our knowledge and understanding of corruption** by building the evidence bases. We will continue to explore ways of **working with business** to address corruption in the private sector through our *Focus on Business* initiative. We will look to **review our systems** in particular on whistleblowing and transparency and we will look opportunities to build the nation’s prosperity now we have left the European Union, especially through our future trade deals. We recognise that real progress against corruption requires **concerted international action**. Through our work with priority partners and our engagement at multilateral institutions, the UK will continue to push **enhanced international standards based upon a rules-based approach** and strive for a greater international recognition of the need for action against corruption and to shape effective international actions.

Measuring the impact of the Strategy

Assessing how we have done is not just a question of which Strategy Commitments we have implemented and how, we also need to consider the impact the Strategy is having.

This is not easy. Corruption itself is a broad topic, covering multiple areas and factors where measuring against statistics is challenging. However, a number of public rankings and indicators exist which analyse international trends across a range of corruption related issues. We worked with the U4 Anti-Corruption Resource Centre and other partners to identify which of these indicators may best assess UK performance on anti-corruption and specifically on the Strategy outcomes of enhancing our security, prosperity and trust in institutions. This has a specific focus on **objective** measures, as opposed to subjective measurements or perceptions of corruption. For the first time as part of this Update (see Annex A), we are including **analysis of the UK’s performance against these indicators**. It shows trends and how we measure up against our G7 partners and provides insights on the general direction of travel.

The analysis shows that while certain individual indicators have fluctuated, the overall trend is that the **UK’s position has remained steady in the first two years of the Strategy**. This is understandable as it may take a few years for the full impact of the Strategy on addressing corruption risk.

We need to be careful in drawing too close a link between these indicators and the Strategy as there are many factors that can influence these measures but we can use them to monitor patterns and trends over the life time of the Strategy to help us evaluate and consider effects of the Strategy.

The UK's systems and procedures have also been stress tested through our membership of the multilateral institutions. Following the strong and favourable report in late 2018 from the **Financial Action Task Force (FATF)**² which found that we have the **strongest controls against money laundering and counter terrorism financing** of any country assessed to date, in 2019 we received favourable reports from the **OECD Working Group on Bribery and the UN Convention Against Corruption (UNCAC)**. In March, the OECD published the Year 2 Review of the progress made against the Recommendations in our Phase 4 report on implementation of the OECD Anti-Bribery Convention which showed we had made significant progress. We also published the Executive Summary of the UNCAC report on the UK which found that we have significant structures, standards, measures, policies, rules and legislation in place to meet the requirements under the Convention. See the *Focus on the Multilateral Institutions* for more details.

The government transposed the vast majority of the provisions in the Fifth Anti-Money Laundering Directive into domestic law through, The Money Laundering and Terrorist Financing (Amendment) Regulations 2019. This transposition ensures the UK's anti-money laundering and counter terrorism financing regime remains comprehensive, responsive to emerging threats, and in line with evolving international standards set by FATF. The consultation on the implementation of the Directive committed to a further technical consultation on the details of the implementation of measures related to trust registration. This consultation³ will ensure the Trust Registration Service contains a robust and proportionate framework, which will be transposed into domestic law during 2020.

Much of the UK's good performance has come from the UK's Bribery Act which the House of Lords Select Committee considered an "exemplary piece of legislation" setting an international gold standard for anti-bribery and corruption legislation.

² The Financial Action Task Force is an inter-governmental body whose objectives are to set standards and promote effective implementation of legal, regulatory and operational measures for combating money laundering, terrorist financing and other related threats to the integrity of the international financial system.

³ Consultation held in early 2020.

REVIEW 1:

Reduce the insider threat in high risk domestic sectors

Goal 1: reduce vulnerability to corrupt insiders in four critical sectors (borders, prisons & probation, policing and defence)

The programme of work across government to counter the insider threat at UK **borders** is being implemented. This has resulted in the training and deployment of trained Border Force officers at a variety of UK ports to deny, detect and deter hostile, criminal and insider activity. We are working to improve background checks for airport workers.

In December 2018, HM Prison and Probation Service (HMPPS) developed an internal Anti-Corruption Strategy for **prisons and probation** which secured full funding as part of the recently announced £100m investment in prison security. This investment will support the agencies' efforts to tackle the insider threat by increasing their capability to protect staff from being drawn into corruption. The strategy will also support a review of recruitment and vetting procedures so that these processes are not exploited by criminals. In addition, HMPPS launched a **Counter Corruption Unit** in April, alongside a communications campaign to encourage prisons and probation staff to report suspected corruption and wrongdoing. It devised a new policy framework, outlining a process for counter corruption staff to pursue, and bring to justice, those suspected of corrupt behaviours. A new memorandum of understanding was also agreed between the National Police Chiefs' Council and HMPPS. This agrees ways of working and sharing intelligence. A similar agreement has also been put in place between HMPPS and the National Crime Agency.

Anti-corruption capabilities in England and Wales' 43 **police** forces were assessed in Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services' (HMICFRS) annual all-force inspections (known as PEEL assessments). The first two of three tranches of inspections were published in May and September 2019 (the third is expected in early 2020). Initial findings have focused on the capacity of counter-corruption units, backlogs in ensuring baseline vetting for all staff and the patchy quality of forces' strategic threat assessments of corruption. HMICFRS published a spotlight report on the police's response to abuse of position for sexual purposes and a number of recommendations for forces. We will be working with forces and HMICFRS to monitor progress on delivering improvements.

Due to pressures on parliamentary time, it was not possible in 2019 to implement relevant provisions of the Policing and Crime Act 2017. This has meant a delay in implementing a number of Strategy Commitments on policing.⁴

For the **defence** sector, we have revised the terms and conditions of the Strategic Crime Intelligence Forum to increase joint working between the Ministry of Defence Police and partner agencies, national law enforcement and other policy partners. This looks across all types of serious and organised crime as it impacts on Defence in all business areas. It meets bi-monthly to exchange, and action, intelligence reporting and lessons learned. In April, the terms of reference for the Forum were amended so that it covered all serious and organised crime types. We have also raised awareness of risks posed by corrupt insiders and shared best practice to improve the security culture through a new policy focused on insider threat detection and leaks.

⁴ Note, the relevant regulations were laid in Parliament in early 2020 and so these Commitments have now been implemented. They will be reported on in detail in the Year 3 Update.

This includes a short awareness film which explains why some Defence material is attractive to criminals and terrorist groups and the key roles individuals can take in denying them access to such materials. We have established regular checks and audits to ensure that such material is properly accounted for and discrepancies are investigated. A dedicated team has been established to independently assure the security of such materials.

We have increased the effectiveness and efficiency of insider threat investigations within MOD by providing the team focused on detecting insider threats better access to data and analysis. This is part of a wider programme of work that we hope will allow the team to proactively investigate and detect threats in the future.

Goal 2: increased awareness of the insider threat across sectors

As the National Technical Authority for Personnel (and Physical) Security and the UK's experts on insider threat, the Centre for Protection of National Infrastructure (CPNI) has developed a new assessment model to benchmark current good practice, identify gaps and challenges and develop programmes for personnel security to reduce risk. The assessments will allow for security measures to be updated or deployed appropriately to the levels of risk and ensure spending is targeted. It will also support organisations developing their internal security through the use of risk mitigation methods. CPNI has identified the **organisations critical to the national infrastructure** and is tailoring its advice for each organisation's threat and risk.

Beyond the Strategy Commitment, we are also working across Government to run this model across the four critical sectors of police, prisons, borders and defence areas. Border Force has completed an assessment and the findings of which are currently being considered. We are trialling the model across three prisons while for policing, this will supplement the findings of the PEEL review process where appropriate.

The Law Commission's review of the Misconduct in Public Office offence will be published in 2020. We will review the findings and provide a response in due course.

REVIEW 2:

The UK as an international finance centre

Goal 1: greater transparency over who owns and controls companies and other legal entities

In June we published the Statutory Review on the implementation of the 2017 **arrangements for exchange of notes on beneficial ownership** between the UK and those Overseas Territories with financial centres and the Crown Dependencies. The Review covers the first 18 months of the arrangements and found that they have been extremely useful in supporting investigations. They have provided UK law enforcement agencies with rapid access to beneficial ownership information on over half a million legal entities, representing 87% of the businesses within scope. The Review found that UK law enforcement agencies requested information approximately four times a week and that 99% of the information requested was provided within the required time frame. The Review made recommendations for future enhancements to the arrangements, which we are considering.

The Registration of Overseas Entities Bill was published in draft in July 2018. The Bill will establish a **public register of beneficial ownership** of overseas legal entities owning or buying UK property. The draft Bill was scrutinised by a Parliamentary Joint Ad-Hoc Committee, which published its report in May 2019. In our response published in July 2019, we agreed to consider some amendments to the draft Bill in light of the Committee's recommendations and this work is ongoing. The Bill will be introduced when parliamentary time allows.

We have continued to work on developing our **beneficial ownership procurement policy** covering public declaration of the ownership of foreign entities awarded UK central government contracts above a certain threshold. We will launch a public consultation paper to seek views on the financial threshold that should be applied to this policy.

Goal 2: stronger law enforcement, prosecutorial and criminal justice action

The National Crime Agency has received an increase in investment to improve the UK response to serious and organised crime, including corruption. This centres on six specific investments:

- the multi-agency **National Economic Crime Centre (NECC)** which launched in 2018 and has been established to **deliver a step change in tackling economic crime**. In its first year, the NECC, working with the private sector (including banks and the legal and accountancy sectors), published a Public-Private Threat Update on Money Laundering, Fraud and International Bribery and commissioned a further two updates on Money Service Businesses and Trust and Company Service Providers to fill national intelligence gaps;
- the **National Data Exploitation Centre** as a new national hub for bringing together and analysing data from the public and private sectors to understand better the threat and identify and respond to those committing serious and organised crime. It will bring together technical and strategic intelligence and support intelligence-led operations;

- the **National Assessments Centre** to provide a single, authoritative view of the national serious and organised crime threat so that the serious organised crime system can respond to the ever-changing nature of the threat. The Centre produces the National Strategic Assessment of Serious Organised Crime that provides a single picture of the threat to the UK from SOC, including money laundering and corruption, over the course of the past year;
- **intelligence** capacity to deliver more high-end cases and proactively target discovery of threats;
- **investigations** capacity to target high-end economic crime and disrupt civil and criminal illicit finance activity; and
- **capability** to support investments through recruitment, training and technology.

The investment has produced tangible results in 2019. The NECC received 120 referrals through a new case referral mechanism across multiple law enforcement agencies. The NECC coordinated a day of action with law enforcement partners against a money laundering network which led to 36 arrests, over 90 Account Freezing Orders and cash seizures of £1.4 million. The NECC has overseen the use of the new powers available under the Criminal Finances Act 2017. The NCA itself has obtained **15 Unexplained Wealth Orders relating to four investigations**, with an estimated value of £143 million. Across UK law enforcement, a total of **1,256 Account Freezing Orders** with a value of £273 million have been obtained since the inception of the Criminal Finances Act. Following an investigation into a Pakistani national with assets in the UK, in December the NCA agreed a settlement of around £190 million, including a London property valued at approximately £50 million. £140 million held in UK bank accounts was frozen using Account Freezing Orders (to date, the largest sum secured using these Orders). These assets will be returned in full to Pakistan.

In July we published the [Asset Recovery Action Plan](#) which includes anti-corruption related commitments for continuing cross-border engagement, identifying priority countries for policy development and operational engagement and making sure that other countries recognise civil recovery orders to support the recovery of the proceeds of crime hidden overseas. Delivery of the Plan is underway. In [2018/19](#), just under £217m of the proceeds of crime were collected, representing a 21% increase up from £179m in 2013/14 and £51m was collected through cash forfeiture. In addition, new powers under the *Proceeds of Crime Act 2002 (External Investigations and External Orders and Requests) (Amendment) Order 2018*, to seize and forfeit personal and moveable assets and to freeze and forfeit accounts in order to recognise and enforce overseas orders came into force in November.

HM Government's response to the **Call for Evidence on Corporate Criminal liability** for economic crime beyond bribery and tax evasion is being actively considered. This is a complex area with diverse and often conflicting views emerging out of the Call for Evidence which raised several important factors that need careful consideration.

The **Office of Financial Sanctions Implementation (OFSI)** imposed its first ever **monetary penalties for financial sanctions breaches** in 2019, with further investigations in the pipeline. It published updated [guidance on post-Brexit financial sanctions](#) in February, going further than the previous guidance on the old pre-EU Exit sanctions regime to help **increase industry and general public awareness of financial sanctions** and to improve compliance. OFSI has conducted its annual review of financial sanctions breaches to **assess the effectiveness** of the sanctions regime. In 2018-19, OFSI received 99 reports of suspected breaches with a reported value of around £262 million. While this was lower (in number and value) than 2017-18, this can be accounted in part due to a small number of high value cases in the previous year. Under the Economic Crime

Plan, we are considering whether new powers or guidance are necessary to enable all HM Treasury appointed anti-money laundering and counter terrorism financing supervisors to take enforcement action where a regulated entity has insufficient sanctions controls.

We are **strengthening law enforcement capability** through City of London Police Economic Crime Academy training which continues to deliver a five-day Bribery and Corruption Investigation Programme to the National Crime Agency and the wider law enforcement community within the UK and overseas. In Year 2 the Academy delivered five weeks of training to UK law enforcement and seven weeks of fraud, bribery and corruption training to law enforcement agencies in Ukraine. The Economic Crime Plan also includes a range of actions on sharing UK law enforcement expertise with overseas partners.

Goal 3: further enhance anti-money laundering and counter-terrorist financing capabilities

The **Office for Professional Body Anti-Money Laundering Supervision (OPBAS)**, which was created in Year 1, **is helping ensure that professional body anti-money laundering (AML) supervisors implement their obligations to a high standard.** It completed supervisory assessments of each of the 22 Professional Body Supervisors (PBSs) listed in Schedule 1 of the Money Laundering Regulations 2017. It also assessed the additional three regulatory PBSs with derogated responsibilities for AML supervision. OPBAS published its first report in March and also required the PBSs to provide action plans which address any deficiencies found during the assessments. These have been assessed by OPBAS throughout 2019 and robust action is being taken where appropriate and proportionate. In addition, OPBAS and the NECC created, under the JMLIT, sector-specific Intelligence Sharing Expert Working Groups to **help share best practice and facilitate the flow of information** by bringing together PBSs, law enforcement and the statutory AML supervisors to discuss strategic and tactical intelligence relating to the accountancy and legal sectors.

Goal 4: strong public-private partnerships, to share information and improve targeting of those who pose greatest risk

In April, HMICFRS published a report on the policing response to fraud which made 16 recommendations **to improve the police response to fraud.** We have been working closely with law enforcement to ensure the report's recommendations are implemented effectively to improve the response to fraud at the local, regional and national levels and the support provided to fraud victims. The Economic Crime plans also set out steps we are taking to improve the response to fraud within the Economic Crime Plan.

The Joint Fraud Taskforce was relaunched in October with a revised structure and objectives with a renewed focus on driving down the level of fraud. It has broadened its membership beyond the financial sector to address vulnerabilities in other systems (e.g. the telecoms network). In addition, the Economic Crime Plan commits us, along with private sector partners, to deliver a number of actions to improve our response to fraud. We have worked with banks and the regulators to improve the transparency of the ways banks protect their customers from fraud. As a result, high street banks will be publishing a 'transparency statement', which also allows them to be compared with each other.

Between January and March, the *Flag It Up* **anti-money laundering campaign** focused on driving significant awareness of the money laundering issue amongst accountants, solicitors and estate agents, promoting a message across 19 media outlets and social media. We also secured input from 24 private sector partners to demonstrate cross-sector unity in tackling the money

laundering threat. From May, we have been undertaking a full evaluation of the Campaign in conjunction with a wider review under the Economic Crime Plan.

The **Joint Money Laundering Intelligence Taskforce (JMLIT)** has **expanded the membership of its banking sector operations group** to include two money service businesses and three additional retail and corporate banks. This has improved how it can operate tactically and strategically. An additional JMLIT tactical operations group was also established to cover the insurance sector.

In May 2019, the JMLIT launched an additional expert working group covering **tax evasion**. OPBAS and the NECC have also established JMLIT Intelligence Sharing Expert Working Groups for both the legal and accountancy professional body supervisors. Expansion into these new sectors may provide lawful access to a new source of data that would greatly enrich the available intelligence picture across a range of financial crime threats.

In addition, the JMLIT is currently working on a project to enhance its **ability to analyse data related to investigations into complex financial crime**. To date, the JMLIT has assisted law enforcement in over 750 cases and produced over 48 Alert reports which have been shared widely across the financial sector to increase awareness of financial crime risk indicators and improve mitigation strategies.

Focus on the Global Beneficial Ownership Campaign

In Year 1, John Penrose MP, the Prime Minister's Anti-Corruption Champion launched a campaign to promote open and free registers of company beneficial ownership as a global norm. In May 2019 at the Open Government Partnership Summit, he co-chaired the inaugural meeting of a Beneficial Ownership Leadership Group and proposed a draft set of Beneficial Ownership Transparency Disclosure Principles which would commit participating countries to develop open and free-to-access registers of company beneficial ownership information by 2023, based on minimum technical standards. To date, a dozen countries have expressed an interest in signing these Principles. We have worked with them and our civil society partners to finalise the Principles and a number of countries have formally signed up.

In June, the three UK Crown Dependencies (Guernsey, Jersey and the Isle of Man) jointly announced their decision to implement their own publicly accessible registers of company beneficial ownership, in line with EU norms. In October, a number of the UK's Overseas Territories largely followed suit (the Cayman Islands, Montserrat, St Helena, Accession and Tristan de Cunha, the Falkland Islands, the Pitcairn Islands and the Turks and Caicos Islands) announcing plans to implement a publicly accessible register of company beneficial ownership, in line with international standards.

In July, we hosted technical working groups for the Overseas Territories (who were joined by the Isle of Man) to discuss introducing publicly accessible company beneficial ownership registers, and how the UK can offer support. This acted as a bench marking exercise. Following that we, along with OpenOwnership, hosted webinars to provide more targeted support to the Overseas Territories, having grouped Territories based on needs.

In 2020, together with civil society partners, we plan to convene the second meeting of the Leadership Group. The UK will continue to work internationally to encourage jurisdictions to make progress on company beneficial ownership transparency, even where their ambition is lower than a fully open and free to access register. We will also provide all reasonable support to the British Overseas Territories to meet their requirements under the Sanctions and Anti-Money Laundering Act 2018 and implement publicly accessible registers by 2023.

REVIEW 3:

Promote integrity across the public and private sector

Goal 1: greater public sector resilience against the threat of corruption

The **Counter Fraud Profession** which covers fraud and other forms of financial crime, including corruption was launched in Year 1 and currently has over 4,305 members. The Profession exists to build capability across the Counter Fraud Function. It is the product of significant collaboration across government, drawing on expertise from civil service officials but also law enforcement, academia and the private sector to develop the standards of the Profession. A code of ethics sets out the expected behaviours of those working in counter fraud: courage, challenging, collaboration and objectivity.

In 2019 the Profession expanded to include members from law enforcement, following applications from the Eastern Region Special Operations Unit (ERSOU) and City of London Police. Work is also underway to extend membership to allow local government counter fraud practitioners to join the Profession.

We identified that Fraud Risk Assessment was an area where capability needed significant but rapid improvement. We developed Fraud Risk Assessment professional standards, guidance and training. This is currently being delivered across government and successful completion will result in membership of the Profession. Standards are being developed on the use of data and analytics for fighting fraud and also on the measurement of fraud which includes corruption as an element of fraud and Economic Crime.

Advisory Panels made up of practitioners act as 'gatekeepers' of the Profession, reviewing learning and development environments in organisations wishing to join, and a Cross-Sector Advisory Group (CSAG) provide expertise to aid development of the Profession.

The **Government Functional Standard for Counter Fraud, Bribery and Corruption** which was launched in Year 1 has now been expanded to include arms-length bodies. Presently, 123 government organisations in total, including 19 departments of the state and 104 arms-length bodies are working towards the full implementation of the Functional Standard. In 2019, 68 new organisations adopted the Functional Standard and are working towards full implementation in 2020. The results of the assurance against 55 of these organisations were published in early 2020, together with the fraud loss data trends for 2014-2019 (inclusive) in the Cross-Government Fraud Landscape Annual Report 2019.

We concluded the project to set up **joint investigative working arrangements** between Government and local authority investigators to detect, investigate and punish social security benefit and local authority non-social security benefit related fraud. This Joint Working Initiative took advantage of opportunities to share knowledge, skills and expertise between Government and local authorities that will contribute to reducing losses to the taxpayer. At the conclusion of the project rollout, 188 local authorities were successfully working with DWP investigators and there are processes in place to enable other councils to join in the future.

Goal 2: a more open government that is trusted by citizens with robust protection for whistleblowers

In Year 1, we reported that in 2019 we would **review the changes to the whistleblowing framework as introduced by the Enterprise and Regulatory Reform Act 2013**, which would incorporate a review of the effectiveness of the Whistleblowing Guidance for Employers and Code of Practice. This was put on temporary hold in 2019 while we waited to see if the new EU Whistleblowing Directive needed to be introduced ahead of EU Exit. We are currently considering the timing and scope of the review.

In Year 1, we introduced protections for **previous whistleblowers seeking new employment opportunities** in the NHS from being discriminated against. In Year 2 we are scoping out how to introduce similar provisions for the children's social care sector which we plan to model on the NHS regulations. We plan to consult key stakeholders and hope to prepare finalised regulations toward the end of 2020 and into 2021.

Goal 3: strengthening UK private sector integrity

In December 2018 we published our response to the call to evidence on the reform of limited partnership law. This found that while limited partnerships continue to fulfil important functions in key sectors of our economy, there are ways in which their legal framework could be strengthened and updated. The response sets out how the Government plans to implement changes to the legislation in light of the responses to the consultation and other views gained through the wider consultation process. These changes include tightening registration requirements, requiring limited partnerships to demonstrate a firmer connection to the UK, increasing transparency requirements and enabling the Registrar to strike from the register limited partnerships which are dissolved or which are no longer carrying on business.

The results of the **review of the Security Industry Authority (SIA)** were published in June 2018. The review concluded that the SIA operates effectively in regulating the private security industry and made recommendations to improve standards. After considering carefully the findings of the review and the wider improvements that have been made across the sector, we responded in February, accepting two of the seven policy related recommendations (relating to improving private security industry sector standards and support for public protection by establishing a legal gateway between the SIA and HMRC), while rejecting the other five (relating to various possible changes to the current regulatory regime), including rejecting arguments to regulate private investigation. We also agreed to accept the review's five non-policy recommendations.

Goal 4: greater integrity in domestic and international sport

We continue to support and sit on the core group of the International Partnership Against Corruption in Sport (IPACS), the only international sporting governance initiative which is a partnership of governments, multi-national organisations and major world sporting bodies to strengthen and support efforts to eliminate corruption and promote a culture of good governance in and around sport. Executive summaries have been published of the findings of the three Task Forces on (a) reducing the risks of corruption in public procurement for major sporting events, (b) ensuring integrity in the awarding processes of major sporting events and (c) establishing a commonly agreed benchmark for international sport governance. At its Steering Committee meeting held in Paris in July, it was agreed that a new (fourth) IPACS Task Force be established to identify gaps that weaken and develop mechanisms to enhance cooperation between law enforcement and criminal justice authorities and sport organizations. Following the successful IPACS meeting in London in 2018, the second-high level IPACS meeting took place in Abu Dhabi in December 2019, prior to the Conference of State Parties of the UN Convention Against Corruption. This Conference also agreed a resolution on combatting corruption in sport, which reconfirmed the UN's support to multi-stakeholder initiatives.

REVIEW 4:

Reduce corruption in public procurement and grants

Goal 1: greater procurement transparency, enabling better identification and mitigation of corruption risks

In the summer of 2019, we completed a **review into the risks of fraud and corruption in local government procurement**. The review began in September 2018 and involved extensive engagement with the local government sector, other government departments and the private sector. Over 80 councils were represented at 7 workshops and 145 responses were received, as well as over 25 case studies and a number of examples of best practice in the local government sector. Relevant departments are discussing the review's findings. We intend to publish the findings in 2020.

The Government Digital Service signed Memoranda of Understanding with three non-profit organisations (the Organisation for International Economic Relations, Open Contracting Partnership and the International Association of Contract and Commercial Management) to support delivery of the Global Digital Marketplace Programme (GDMP) at national and regional level with partner governments. We also held a workshop in September with the Behavioural Insights team at the OECD on behavioural science. This highlights how we use our expertise to help other countries in the **digital transformation of their government procurement services** which enables small and medium size businesses, from both the UK and abroad, to work more easily with government. Please see *Focus on the Global Anti-Corruption Programme* for further details on work on the GDMP.

Goal 2: strengthened awareness and capability within contracting authorities

At present, an individual or company registering with government services may be allocated different identification numbers across different systems and services, such as a company number or a charity number. This makes it difficult to identify the same recipient of government funds which could therefore be open to abuse. Developing a unique identifier (a digital name tag that can be used across different systems) will allow us to cross-reference companies those receiving government funds. This year, we continued to explore developing **a unique identifier for government grants data**. We continue to work with our database partners to identify how to implement protocols for the use of unique identifiers for **grant** recipients in the government grants database, looking at the technology to see if we can enable access to data automatically. A review of award notices on [Contracts Finder](#) has identified that around 20% of all awards on Contracts Finder have Companies House numbers. We are working alongside data feed providers to ensure that organisation identifiers are present in at least 90% of domestic and international award notices by March 2021. We are also preparing an internal report to monitor data on the use of **contract** identifiers more closely. This Report is looking for opportunities to join up the use of existing identifiers in procurement and financial systems.

Work has continued on the **National Fraud Initiative** (NFI) four-year strategy, which included a pilot of using HM Revenue & Customs earning, property ownership and household composition data to allow local authorities to better target fraud risks. We have increased training of local authorities to help inform them on how they can better use the NFI services. A total of £71m has been returned as a result of identifying fraud through the NFI between April 2018 and March 2019.

The **Ministry of Defence** (MOD) became a voluntary participant in the NFI in January and is using it to **explore anti-corruption data analytics** in its procurement work. Using the NFI services, it is collaborating with the NHS Counter Fraud Authority to see whether medical practitioners and suppliers are invoicing both organisations for the same items/services. The MOD has engaged with Companies House to explore how the processes for hiring its suppliers could be improved to identify hidden threats, by carrying out additional checks against Companies House data. The MOD now has a robust “lesson learned” process in place which addresses policy and process control issues that require change/implementation to prevent and/or detect fraud, error or loss.

Goal 3: greater confidence in efficient and legitimate contract management

At present, bidding companies are required to self-certify that there are no reasons why they should not be awarded a public contract. In 2018 we undertook a **convictions check trial** to see if any public contracts had been awarded to suppliers with convictions specified under Regulation 57 the Public Contracts Regulations 2015.⁵ The trial found that this had not happened but did identify a range of issues relating to obtaining convictions data outside the UK. We are considering how we can resolve access to international data for vetting purposes, as part of a wider programme of work on data sharing arrangements now the UK has left the EU.

In February we published the procurement policy note and guidance *“Applying Exclusions in Public Procurement, Managing Conflicts of Interest and Whistleblowing”*. This applies to all Central Government Departments, their Executive Agencies and Non-Departmental Public Bodies in conducting procurement procedures regulated by the *Public Contracts Regulations 2015*, the *Utilities Contracts Regulations 2016* and the *Concession Contracts Regulations 2016*. It is also relevant to the wider public sector such as local authorities and NHS bodies in carrying out procurements for public, utilities and concession contracts. We have provided training to commercial policy personnel in support of implementing the note and guidance. We reviewed this note and guidance in late 2019 with a view to publishing a refreshed version (if required) by mid-2020.

The **NHS Counter Fraud Authority’s** (NHSCFA) new business plan has doubled the financial targets for detecting and recovering the volume of fraud (including corruption) and, for the first time, a target has been set for the value of fraud prevented. Governance between the Department for Health and Social Care and the NHSCFA has been refined to improve oversight and accountability and a new formalised process for handling fraud-related correspondence, including whistleblowing cases, has been instituted. The NHSCFA is also reviewing its approach to the Strategic Intelligence Assessment, the tool it uses to capture all available intelligence relating to fraud across the NHS and the wider health sector. Future Assessments will go beyond focusing on the overall risks and estimates of fraud loss and include an assessment of threats, vulnerabilities and enablers that can cause fraud to occur. This will improve ability to identify weaknesses and possible mitigations.

⁵ Regulation 57 of the PCR 2015 lists the circumstances under which a firm can be excluded from participation in public procurement procedures. This includes a list of offences which, if a firm is convicted of, requires that firm’s exclusion from participation in public procurement procedures.

REVIEW 5:

Improve the business environment globally

Goal 1: reduced impact of corruption on trade and investment internationally

Working with multilateral institutions can help us to raise global standards and ensure a rules-based approach to bribery and corruption internationally. Through these bodies we can work with other countries, enhance cooperation on law enforcement and share best practice. We continue to be actively involved in the influential OECD Working Group on Bribery, the G20 Anti-Corruption Working Group and other multilateral institutions supporting their work on Anti-Corruption **policy and principles to ensure countries have strong systems to counter Bribery and take action to eradicate corruption risks.** See *Focus on Multilateral Institutions* for details.

As we become an independent trading nation, we will be free to determine our own future and form partnerships with old allies and new friends around the world. As we **strike new trade deals** with the EU and bilateral agreement with other countries, we have the chance to introduce anti-corruption measures to avoid trade distortion so that UK business can operate in markets fairly. We have been **actively considering how transparency and anti-corruption can best be supported** through these new trade deals, by consulting with key stakeholders including civil society and have conducted in depth analysis of the nature of free trade agreements that exist today globally. We have completed the public consultation on possible free trade agreements (FTAs) with the USA, Australia and New Zealand. This work will enable us to enter into informed discussions with future trading partners.

Goal 2: enhanced international development finance and export finance practices

UK Export Finance (UKEF) completed its Financial Crime Compliance Review into its policies and procedures in relation to financial crime compliance and operational structures (see Year 1 for details). As part of this it has **established and fully recruited a Due Diligence Unit (DDU)**, independent of the transaction originating, negotiating and underwriting teams. This Unit is reviewing of historic due diligence outcomes to baseline future performance as well as undertaking analysing active transactions to test consistency of output. The due diligence work on all UKEF's transactions is moving to the new Unit. At the same time, a dedicated Financial Crime Compliance Division (FCCD) has been established to be independent of both the transaction teams and the DDU management chains. FCCD will set, review and monitor performance against policies, consider high risk transaction or those with identified "red flags" and report regularly to senior management.

UKEF also played an active role in the negotiation of the new *OECD Recommendation on Bribery and Officially Supported Export Credits* which was adopted in March. This Recommendation is designed to promote **higher standards of anti-bribery due diligence**, particularly in relation to enhanced due diligence on agents and agents' commission.

To **publish more investment information**, CDC, the UK's development finance institution, launched its new investment database in July 2018 which improved the level and accessibility of the data it shared on each investment. Updated in 2019 to include all new direct investments, fund commitments and underlying fund investments made until end 2018, this has led to an increase of over 100% in users searching for investment information. CDC is sharing its experience with European counterpart development financial institutions to **encourage** consistent publishing of relevant investment information.

CDC expanded its Business Integrity and Compliance team from 8 to 15 staff and undertook a review assessing CDC's approach to Business Integrity set against a defined best practice framework. This review identified a number of key areas to strengthen the organisation and ensure that its **investments are underpinned by world-class due diligence**. Key recommendations from the review included splitting the Business Integrity (BI) and Compliance functions into two separate teams. This is designed to clarify the purpose and role of each team. BI is now accountable for "know your customer" verification checks and the BI team has been embedded within the first-line-of-defence as a business support function. The Compliance team, which is part of the second-line-of-defence will continue to focus on ensuring that CDC complies with its legal and regulatory obligations and managing CDC's whistleblower channel and FOIA requests. The new heads of each unit have been recruited and they are implementing the recommendations. This includes strengthening the BI team, articulation of the BI risk appetite (which will ensure a consistent approach to identifying, assessing, monitoring and managing risk through the duration of the investment), and creation of a new "know your customer" Operations team which will report to the Head of Compliance.

Goal 3: increased investment with integrity by UK companies in challenging overseas markets

In Year 1, we launched the Business Integrity Initiative (BII) as a cross-government initiative designed to provide **new practical guidance** to help companies overcome barriers to doing business in frontier markets. The BII is running three country pilots in Kenya, Mexico and Pakistan to test how our diplomatic missions, in partnership with chambers of commerce, trade associations and industry bodies, can provide business integrity support to UK and international companies trading with these countries.

In February we launched an awareness raising campaign on the BII and make the case for doing business with integrity, consisting of opinion articles, case studies and dissemination of information and available tools to business networks. Part of this campaign offered **tailored, match-funded guidance for small and medium sized enterprises** offering businesses up to five days' support from a consultant on anti-corruption and the protection of human rights when trading with developing and emerging markets. In September, we also launched a fund to support existing collective action initiatives with and for the private sector on anti-corruption. The initiatives to be supported will make a valuable contribution towards building markets in which all companies (including UK businesses) can compete freely and fairly. This was supported by the creation of an Expert Panel co-chaired by the PM's Anti-Corruption Champion and the Director of the Institute of Export. The Panel represents a cross-section of professionals from across Government, private sector and third sector, and ensures the BII remains relevant to business needs.

Goal 4: Strengthened business-led collective action to reduce corruption

We launched a scoping exercise entitled *Focus on Business* to explore ways in which we can work with business, especially big business, in further tackling corruption. In discussion with key stakeholders, we are looking at voluntary adoption of methods and initiatives for big business, collective action, research and education beyond compliance. This work will compliment and look to support the OECD *Trust in Business* initiative launched in 2019. We intend to develop concrete proposals throughout 2020.

Focus on the multilateral institutions

We are active participants in a number of multilateral institutions focusing on bribery and corruption; the **United Nations Convention Against Corruption (UNCAC)**, the **G20 Anti-Corruption Working Group (G20 ACWG)**; the **OECD Working Group on Bribery (OECD WGB)** which oversees implementation of the OECD Anti-Bribery Convention and the **Council of Europe's Group of States Against Corruption (GRECO)**. These fora enable us to work with a range of international partners to build recognition of the need to combat corruption whilst shaping joint action, to work towards a level playing field for our business to operate internationally and to stress test our own systems through a series of rigorous peer reviews.

The UNCAC executive summary of the review of the UK in 2017/18, focusing on prevention (including money laundering) and asset recovery, was published in May. Overall the UK received a positive review from the UNCAC reviewers. The Executive Summary provides a strong narrative which outlines the UK's significant structures, standards, measures, policies, rules and legislation in place to meet the requirements under the Convention. The Executive Summary signposts the following as top successes and good practices including ongoing efforts of the UK to extend the Convention to Overseas Territories, as appropriate, the structures and governance for the coordination of anti-corruption activity, broad participation of civil society organizations and the private sector, implementation of public beneficial ownership registers, transparency of asset recovery procedures and practices, including on disposal of property and tools and mechanisms to enhance asset recovery. The Report issued a number of recommendations for us to follow up on. A final report will follow in 2020. In 2019 the UNCAC Implementation Review Group meetings and Working Groups have focussed on the implementation of the prevention and asset recovery articles of the Convention. The Conference of State Parties in Abu Dhabi in December re-affirmed international commitment to anti-corruption and defined priorities by agreeing 15 Resolutions. It also acted as a forum for the exchange of best practices between member states.

We worked extensively with G20 ACWG partners to agree and publish a Compendium of Good Practices for Promoting Integrity and Transparency in Infrastructure Development and High Level Principles for the Effective Protection of Whistleblowers. We also supported the inclusion of anti-corruption and transparency principles in the G20 Quality Infrastructure Investment Principles. These provide a blueprint for international organisations to use to encourage others to align their frameworks and provide a mechanism for G20 leaders to drive high level political momentum.

In March we provided our Year 2 Update on progress against the recommendations contained in the OECD WGB Phase 4 Review. This "half time" report was largely favourable highlighting significant work notably asserting the SFO's role and generally enhancing the capacity for detection and enforcement of the foreign bribery and related offences, as well as enhanced cooperation and coordination between law enforcement agencies through the NECC. It found that we had fully implemented 16, partially implemented 18 and not yet

implemented 10 of the Recommendations, which reflects the significant progress we have made so far. We will make a final report in March 2021. Beyond our review, we have been active participants in the OECD WGB which in 2019 completed country reviews on Latvia, Japan, Peru, Colombia and Hungary, completed High Level Missions to Russia and Sweden and made public statements over potential breaches of the OECD Anti-Bribery Convention by a number of member states. We also began extensive discussion on the future revision of the 2009 Recommendation which will be a major focus for 2020.

The UK was due to issue an update to GRECO on our progress against the recommendations made in its 2017 Report in 2019 but this was delayed due to the General Election.⁶ This is due to be discussed and assessed a future plenary (at a date to be confirmed) following which a Compliance Report is expected to be published, in which GRECO will assess and rate our level of compliance with each recommendation. UK experts continue to participate in GRECO's country evaluation process, with UK officials joining the evaluation teams of Spain and Germany. The Head of the UK Delegation to GRECO, remains an elected member of GRECO's Bureau which oversees and steers the work of GRECO and makes proposals and recommendations to the plenary.

In March, we funded the annual OECD Anti-Corruption and Integrity Forum. This event brought together over 2,000 government, business and civil society leaders and experts from 120 different countries to develop and share best practice approaches to addressing corruption. The forum focus was on the risks and opportunities of adopting new technologies in the Anti-Corruption and integrity field. This allowed new insights related to trade, foreign bribery, competition and development cooperation.

6 The report was submitted in March 2020.

REVIEW 6:

Work with other countries to combat corruption

Goal 1: reduced impact of corruption on trade and investment internationally

In 2019, we published the 4th and 5th UK Extractives Industry Transparency Initiative (EITI) Reports.⁷ The 4th Report covers reconciled **payment data at company, government entity and project levels** for 2017. The 5th report covers **the state of the extractives industry and payments** made 2018. The UK's extractives sector is perceived internationally as being largely corruption free and these reports identify the positive contribution that the extractive sectors are making to the economic and social development of the UK and to demonstrate the industries' commitment to transparency and good governance.

Additionally EITI released its report on the UK, finding that we have made “meaningful progress” in implementing the 2016 EITI Standard. It recommended some minor corrective actions for the UK to undertake to achieve a fully compliant assessment, and these need to be addressed by the end of 2020.

We participated in two OECD events on commodity trading as part of the Natural Resource Dialogue. These events were an opportunity for us to **work with like-minded partners** to address some of the technical challenges in relation to reporting in kind payments to governments, as well as hear the different perspectives of trading hubs, state-owned enterprises, governments, traders, civil society and extractives companies.

We carried out a scoping study focusing on what action the UK could take to enhance company disclosure and what the risks and benefits would be to include commodity trading in national mandatory company reporting requirements. We are considering the findings of the study.

The **HMRC Tax Capacity Building Unit** programme shares the UK's knowledge and expertise to counterparts in developing countries on building the capacity of revenue administrations to tax authorities to improve their tax administration through long term secondments and by providing technical assistance. The programme continues to **deliver tax technical assistance** to its partner countries in Ethiopia, Ghana, Rwanda, Pakistan, Jordan and Uganda. The programme has also increased the number of countries it is supporting, with scoping visits to Kenya, Sierra Leone, Zimbabwe and Vietnam and is supporting transparency work in Egypt and Nigeria.

Progress includes introducing the **Common Reporting Standard** for automatic exchange of information in **Ghana** and **Pakistan**. The Ghanaian Revenue Authority has gathered financial data about residents of 32 participating jurisdictions and are finalising the IT arrangements required to send out the data. Further work is required to support them in passing a February 2020 data security review, the successful completion of which will allow them to receive back reciprocal information about offshore accounts operated by Ghanaians. Meeting this standard will allow Ghana to tackle tax evasion by sharing information with international tax authorities. Pakistan successfully implemented the Standard in September 2019 and by October 2019 attributed the identification of assets totaling over £500m hidden overseas.

⁷ The Extractives Industries Transparency Initiative (EITI) is a global standard to promote open and accountable management of natural resources, of which we are a member. It seeks to strengthen government and company systems, inform public debate and enhance trust. EITI requires oil, gas and mining companies to disclosure and reconcile their payments to Government agencies.

The Open Contracting Partnership, partially funded by the Department for International Development, has continued **to support countries in implementing more open contracting in public procurement**. Since January, saw three strong support around open contracting from the governments of Afghanistan, the Kyrgyz Republic and Portugal that both combine high-level political commitment with concrete goals, budget and a dedicated implementation team. We have also seen commitments to open contracting in a further eighteen jurisdictions. The Open Contracting Data Standard Helpdesk has supported 56 countries to date with technical advice, data reviews, and ad-hoc requests.

In addition the EITI Standard was revised to a 2019 edition, the G20 Compendium of Good Practices (see *Focus on Multinational Fora*) and the G7 Biarritz Declaration includes a section on transparency in public procurement that specifically encourages open contracting.

Goal 2: reduced levels of corruption in partner countries

In Year 1 we reported that the “**whole of UK Government**” commitment would be delivered as part of a cross-government effort to tackle serious and organised crime in priority jurisdictions. This involved launching a new internal cross-government International Illicit Finances Strategy which aims to coordinate activity across government. The Economic Crime Plan, published in July, draws on this whole of Government approach, and more broadly sets out a joint approach between HMG and the private sector to tackling economic crime. We have deployed a network of illicit finance leads in major financial centres to drive international engagement on this issue. We have also completed an Illicit Financial Flows Serious and Organised Crime Joint Analysis which provides a solid evidence base and policy recommendations.

Since its launch in 2018, ECOFEL, the **Financial Intelligence Unit Excellence and Leadership Centre under the Egmont Group**, has improved operational capacity for financial intelligence units around the world to receive and deliver quality products. It has produced training and presentations including an eLearning platform, increased international cooperation, improved political support of financial intelligence units and set up operations to enhance the domestic influence of stakeholders. Through this, it is **improving the ability of member countries to identify and address possible corruption and money laundering**.

We participated in the UNODC led international expert meeting on asset return in May which agreed a set of recommendations which reinforce the GFAR Principles on Asset Recovery. This included the importance of political commitment for successful asset return; the need for co-operation between requesting and requested states; the voluntary nature of bilateral agreements for asset return and the need to ensure transparency in the return process. We also participated in a side event on asset recovery at the G20 Anti-Corruption Working Group in October where UK activity and good practice featured strongly. This included, the Framework for the return of Assets from Corruption and Crime in Kenya, as well as UK support to monitoring asset return in Nigeria.

Goal 3: enhanced action to reduce corruption in fragile and conflicted affected states

We have made progress in **promoting greater defence transparency** through our support of the **Transparency International Defence and Security Programme (TI-DS)**, including through research and country specific projects. TI-DS is continuing progress on its flagship research project, the Government Defence Anti-Corruption Index, releasing analysis based upon geographical regions including the Middle East and North Africa published in 2019 and subsequent regions to follow in 2020. Domestic reforms are occurring in **Ghana, Ukraine** and

Lebanon. To illustrate, in Ukraine, TI's work has led the relevant parliamentary committee to increase oversight over the classified part of the defence budget. Work in Nigeria continues but is being affected by shrinking civil society space. Further support is being conducted through the Defence Integrity Action Fund, wherein TI offices apply for grants focused on defence transparency and anti-corruption. Grants have previously been awarded to TI offices in Serbia and Russia.

Through the MOD's Building Integrity UK Programme, we have supported the development of indigenous defence sector building integrity training and education centres in Jordan, the Occupied Palestinian Territories, Afghanistan, Albania, Macedonia and Ukraine, which have trained national staff. UK trained personnel have delivered building integrity training to institutions in Afghanistan, Colombia, Estonia, Guyana, Jamaica, Kyrgyzstan, Macedonia, Montenegro, Palestine, Tajikistan, Ukraine and in NATO during this period.

Focus on the Global Anti-Corruption Programme

The Prosperity Fund Global Anti-Corruption Programme (GACP) is deploying £45m over five years (2017-2022) to promote inclusive sustainable growth and increase global prosperity through tackling corruption. The Programme consists of nine projects delivered bilaterally, regionally and globally. The bilateral investment, which is 30% of the budget, goes to five out of the twelve prosperity fund priority countries; Colombia, Indonesia, Malaysia, Mexico and South Africa.

It is made up of nine inter-connected projects that will help target countries and regions to:

- invest in introducing new policies, laws and regulations as well as strengthening existing ones;
- increase transparency across the public sector, on beneficial ownership and procurement systems;
- strengthen the ability to investigate and recover stolen assets, raise awareness of the causes and impacts of corruption, including upon gender and inclusion; and
- identify, apply and disseminate good practice approaches.

The Programme directly delivers on a number of Strategy Commitments and commitments made at the 2016 London Anti-Corruption Summit. The Programme funds the following areas:

Sharing Good Practice Approaches to Tackling Corruption and Enhancing Business Integrity:

in partnership with the OECD, this project provides greater access for developing countries to contribute to global anti-corruption discussions and exchange good practice. In 2019 this included funding the OECD Anti-Corruption & Integrity Forum which focused on the role of new technologies and data analytics in tackling corruption.

Implementing the UN Convention Against Corruption: in partnership with the UN Office on Drugs and Crime (UNODC), this project is working to fast track the implementation of the Convention. It is concentrating on priority activity with the highest potential impact, such as financial investigations and public-sector transparency. In 2019, two regional technical assistance platforms were launched in Mexico, South America and Southern Africa, and technical assistance is ongoing in East Africa and South East Asia for these platforms.

Co-ordinating International Intelligence Sharing on Grand Corruption: the International Anti-Corruption Co-ordination Centre (IACCC) is working to recover stolen assets. The IACCC shares intelligence across jurisdictions and builds capacity to support grand corruption cases in developing countries. The centre has worked on 27 cases and supported a number of high-profile arrests involving politicians and public officials across the world.

Supporting the global recovery of stolen assets: implemented through the Stolen Asset Recovery Initiative (StAR) – a joint World Bank and UNODC programme that works to end safe havens for corrupt funds. Following the Global Forum for Asset Recovery in 2017 which the UK co-hosted, StAR has provided technical assistance to a large number of requesting states and published a range of important knowledge products including beneficial ownership guides.

Improving Transparency of Company Beneficial Ownership: OpenOwnership is a new organisation part funded by the GACP established to create a recognised international standard on company beneficial ownership. It houses a global register of company beneficial ownership and also provides technical assistance to developing countries to establish their own company beneficial ownership registers.

Combatting Corruption in Oil, Gas and Mining Sectors: this project is working to provide clarity and transparency over the real owners of the companies who have the rights to extract oil, gas and minerals.

Strengthening anti-money laundering systems: the Financial Action Task Force (FATF) is the global standard setting body for anti-money laundering and counter-terrorist financing. This project is strengthening FATF-style regional bodies and anti-money laundering systems in Sub-Saharan Africa and the Caribbean.

Supporting Global Digital Marketplace Platforms: the UK Government's Digital Service (GDS) is working with partner countries to achieve greater transparency and scrutiny of public procurement decisions. In 2019, GDS worked collaboratively with a range of stakeholders in Colombia, Indonesia, Malaysia, Mexico and South Africa to identify areas for reform in public procurement and formulate tailor made plans for improvements.

Behavioural science: this project is applying behavioural science to influence behavioural change to reduce corruption. Exploratory work is under way to identify key corruption risks that could be addressed by behavioural science.

DELIVERING OUR VISION

Improving our understanding of corruption

To provide a **clearer picture of domestic corruption**, we have commissioned IFF Research to undertake an economic crime business survey which will survey 5000 people across seven sectors of particular risk of corruption and fraud. The feasibility, scoping and design of the survey is well under way with the results expected in mid-2020. We have also recruited a senior policy adviser whose role it is to support cross-government coordination of research and ensure that HMG develops a stronger more in-depth understanding of domestic corruption.

In May we launched the 4th National Action Plan for Open Government to **improve the quality and breadth of relevant open data releases**. This has included reviewing the challenges and barriers to publishing government open data in a machine-readable and structured format and identifying improvements. We have been working across Government to ensure that open contracts data is a key part of the UK open data agenda. The UK is the first G7 country to commit to the Open Contracting Data Standard for contracts. This is part of a global shift to open public contracting, reducing fraud and corruption, saving governments money and time, and creating opportunities for small and medium-sized businesses.

We supported Nigeria to **measure and report its anti-corruption efforts for the UN Sustainability Development Goals** by funding a survey to measure its levels of corruption. The project has so far set up steering and technical committees of relevant stakeholders including anticorruption agencies, the judiciary and civil society organisations. The report for the survey is currently under review and an executive summary is expected to be ready in 2020.

Working together

As noted above, we worked closely with civil society and the private sector in 2019 to **honour our Open Government Partnership commitments** through the implementation of the 4th National Action Plan. This Plan contains a number of ambitious new measures including plans to develop a global reporting standard for the extractives industry and the establishment of forums to deliberate and make recommendations and decisions. We also plan to develop the Digital Charter and National Data Strategy, improve compliance, coverage and quality of publication to Contracts Finder and enhance company disclosure regarding payments to governments for the sale of publicly owned oil, gas and minerals.

In March we ran a series of Open Government Week events focused on transparency in contacts and extractive industries, as well as increasing public participation and gender inclusion in government. We have developed an open government manual for policymakers to enable and promote more transparent, open, and accountable policymaking. In April we ran the first Feminist Open Government workshop in the UK with Open Heroines which delivered a Gender Dataset focused on data related to women in the UK.

We worked closely with the Royal United Services Institute (RUSI) for its June 2019 report on corruption and fraud in the UK. This focused on organisations in the four focus sectors (the NHS, financial sector, construction and local government), law enforcement agencies and policy-makers to look at the distinction between corruption and fraud and how effective responses to corruption and fraud differ. It also looked at which data sources can be used to assess the types, scale and sectoral risks of corruption as distinct from fraud. The report

contained recommendations **to strengthen the linkages between evidence and policy**, looking for a more joined up approach from across law enforcement and government in terms of understanding of corruption as well as sharing of information and data.

Promote international standards and partnerships

In addition to the activity outlined in the *Focus on Multilateral Institutions*, we are supporting the partnership of the Egmont Centre of Financial Intelligence Unit Excellence and Leadership (ECOFEL) and the United Nations Office on Drugs and Crime (UNODC) in implementing the Financial Investigation (Financial Flows) in Wildlife and Forestry Crime (FIWF) project. The project aims to improve the detection of proceeds from **wildlife crime** and the sharing of information that can help lead to an increased number of financial investigations and case-evidencing. The project has helped to build an evidence base relating to the financial flows of wildlife crime, in order to support targeted action against the criminal organisations and corrupt facilitators of the illegal wildlife trade. UNODC has mentored six partner states to identify wildlife crime cases, where recent arrests of wildlife crime offenders have offered opportunities to commence parallel financial investigations, creating additional opportunity for successful prosecutions of corruption, money laundering and other related economic crime offences.

We have worked with the **Commonwealth Secretariat** to promote anti-corruption initiatives at the Commonwealth Heads of Government Meeting 2020 in Rwanda, including a proposed focus on increasing corporate transparency and showcasing of public-private partnership models which will demonstrate good practice initiatives to tackle corruption. We have also helped design the proposed Commonwealth Anti-Corruption Benchmarks, which would provide a framework of minimum standards for countries to use as a 'checklist' to measure their anti-corruption practices and make improvements. The Benchmarks are due to be formally launched at the 2020 meeting in Rwanda.

Throughout the year we also worked with individual countries, to promote international standards and delivering anti-corruption efforts. This includes supporting **Ukraine** through our Good Governance Fund Programme (GGF) to build public confidence in the Ukrainian state. This has helped the National Anti-Corruption Bureau of Ukraine (NABU) to improve its investigative and institutional capacity. NABU has now launched over 700 investigations including against senior officials, parliamentarians and ministers. Similarly, the GGF has supported activities to help the **Moldovan** Government develop a more robust regulatory framework for the banking sector. This helped reduce the risk to the banking sector resulting in three commercial banks (which were affected by the banking scandal in 2014) to be able to actively support economic growth. This contributed to renewed foreign investment in the Moldovan banking sector returning in 2018 for the first time in almost a decade. We have also continued to build partnerships on illicit finance with our closest allies, for example we held a strategic dialogue on illicit finance with the US at which we explored plans to tackle the threat from shared jurisdictions of risk, our respective use of innovative tools and agreed strategic priorities for future collaboration. In **Nigeria**, we helped to promote the accountable and transparent return and management of stolen assets, through civil society organisations monitoring and strengthening systems, to prevent re-looting which is supporting Nigeria's ability to protect public funds to self-finance development. This is delivered through the MANTRA Project which has leveraged the return of the US\$322.5million from Switzerland to Nigeria, by improving transparency and accountability in the utilisation of recovered assets for the benefit of Nigerians.

FORWARD LOOK – 2020

Year 3 will mark the half way point of the Strategy and while there has been considerable progress in a number of the areas, work will continue on remaining Commitments, across the Priority areas.

In particular, we will focus on:

- looking for opportunities to **build the nation's prosperity** now we have left the European Union, including, where possible, agreeing meaningful anti-corruption measures in our future trade deals;
- continuing to **build the capability of the NCA and the NECC** to tackle economic crime, including bribery and corruption;
- implementing the Asset Recovery Action Plan **to increase our capability to recover assets** and the amount we are recovering and improve law enforcement's response to politically exposed persons (PEPs) who bring stolen funds to the UK;
- delivery of the **SARs Reform Programme** by ensuring that the regime protects the integrity of the regulated sector and supports the disruption of money laundering, terrorist financing and predicate offences;
- continuing to campaign for a **new global norm of open registers** to show who owns and controls companies;
- working with international partners and multilateral institutions, to respect and promote **enhanced standards through an international rules-based approach** and strive for a greater recognition of the need for collective action against corruption;
- improving understanding of **who owns property** in the UK by progressing the Registration of Overseas Entities Bill when parliamentary time allows;
- responding, where appropriate, on the issues identified by the Council of Europe (GRECO);
- exploring further opportunities to enhance anti-corruption and transparency measures in our **public procurement**;
- utilising the expertise of the CPNI to assess the maturity across priority sectors and considering further ways to **strengthen our defences against the insider threat**;
- continuing to work on the **counter fraud** agenda, including publishing the number of detected corruption incidents in government departments and their arm's length bodies in the 2020 Cross-Government Fraud Landscape Annual Report;
- legislating on **limited partnership reform**, when parliamentary time allows;
- consider proposals to consider on **working with business organisations** to further tackle corruption, beyond compliance activity;
- looking at how to reform our systems in particular on **whistleblowing**;
- **improving our understanding and response to the international illicit finance threat to the UK** so that the corrupt and criminals find it harder to profit from their crimes; and
- **expanding our knowledge and understanding of corruption** including by publishing a survey of the UK business experience of bribery and corruption and further building the evidence base.

CORRUPTION INDICATORS

How is the UK doing in reducing corruption?

Introduction

There is no single method for measuring progress in tackling corruption. Measuring corruption is inherently challenging as, by nature, it is often a hidden crime and one that goes largely undetected and un-reported. Corruption is also multi-faceted and there is no single measure or set of metrics that can fully capture all its dimensions.

The focus of the Anti-Corruption Strategy is to further strengthen security, prosperity and trust in institutions. In order to consider progress on these three elements, the Joint Anti-Corruption Unit (JACU) has been proactively working with the independent U4 Anti-Corruption Helpdesk and other partners to develop a set of global indicators to indicate the strategic direction and progress of the UK in reducing corruption.

How is the UK doing?

Initial analysis of the indicators identifies the UK's standing has remained relatively steady over the first two years of the Strategy and that these largely continue the trends seen in the build up to the Strategy period. The UK measures up well against our G7 partners in many areas, in particular in open data, perceived prevalence of corruption in our systems and trust in institutions. However, downward trends in a number of indicators show that we cannot be complacent, and we will consider the factors influencing these downturns, in particular on perceptions of corruption and independence of the judiciary. We also need to ensure we consider the worsening trends in terms of what actions can be applied to mitigate these trends and closely monitor relatively new indicators (e.g. recorded levels of corruption) to see what they can teach us as more data is available and a clearer story emerges over time.

Is the Strategy working?

Although these indicators give a useful overview of how the UK is doing generally, it is important to note that the following is not an attempt to establish direct causality between delivery of the Strategy and results of these indices. Many of the factors influencing the indicators will predate the introduction of the Strategy and many of these influences will occur completely independently from the Strategy. To the extent that the Strategy itself does influence the indicators, the effects may not be felt for some time, beyond the Strategy period and identifying these factors may be difficult.

The usefulness of the indicators comes from being able to identify the factors that are positively and negatively affecting the UK standings and consider the impact of the Strategy, the resourcing and prioritisation across the Commitments and what further action could be taken.

Indicators of corruption

The following five “baskets” of indicators contain results published mainly by external sources who have collected or analysed the base data. The **Scores** denote the UK’s score as determined by these sources and the **Ranking** denotes where the UK positions against other countries rated in the indicators (where available). The **Trend** identifies how much our score has improved or declined since the prior most recent Score.⁸ In addition, we have selectively included trends and country comparison using charts to demonstrate change over time comparing the other G7 nations for selected indicators. This helps to provide a global perspective. Note these figures include those published for 2019 only. 2020 figures will be reflected in the Year 3 Report.

1. Measuring regulation and transparency that reduces corruption.

Transparency, open data and budget accessibility and stakeholder engagement in the policymaking process are important safeguards known to reduce the risk of corruption. These indicators provide some insight into the strength of regulation and willingness to be open with data and budgets within the UK.

Indicator	Previous score	Current score	Ranking	Trend
Indicators of Regulatory Policy and Governance (IRPG) (aggregate composite indicator on stakeholder engagement)	2.96 (2014)	3.06 (2017)	NA	+3%
Open Budget Survey (OBS)	74 (2017)	74 ⁹ (2019)	=10/115 (2017)	Stable
Open Data Barometer (ODB)	75 (2016)	76 (2017)	2/30	+1%

These indicators show a broadly stable picture from a range of global indicators focused on transparency and regulation. We saw some improvement on the IRPG, which measures stakeholder engagement and governance. These help to ensure that regulations are in the public interest by involving affected groups, including citizens, businesses, civil society and other community members.

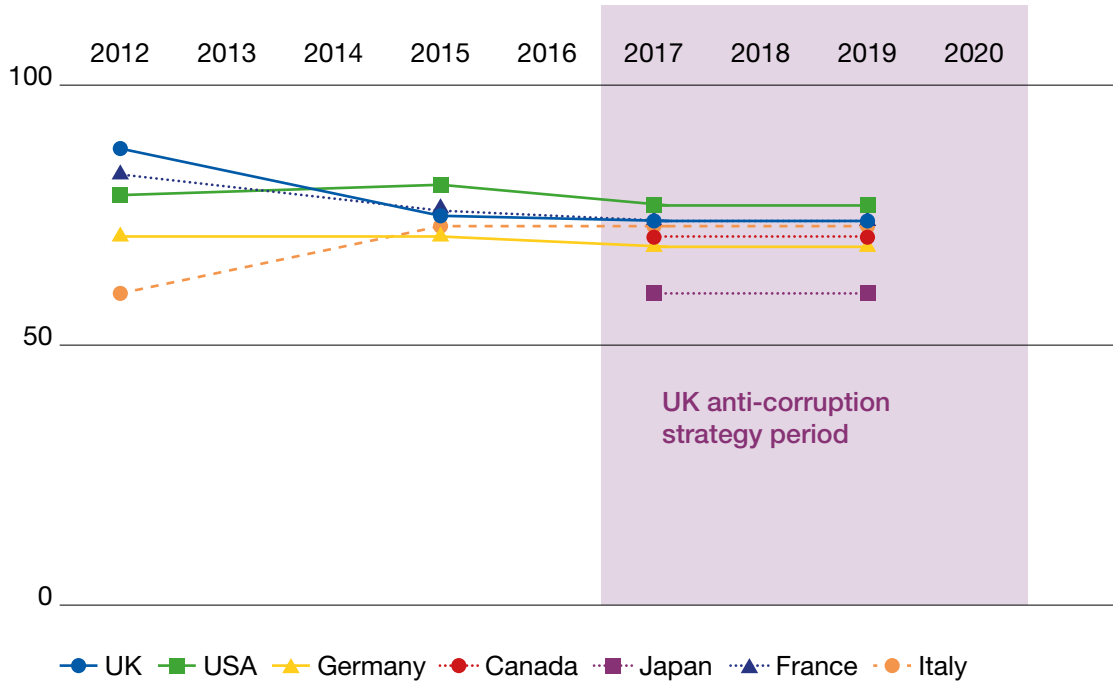
The last two measurements for the OBS were relatively stable. This measure assesses budget transparency based on the amount and timeliness of budget information governments make publicly available. The UK is currently ranked 10th globally, behind Romania (9th) and the US (joint 7th).

The UK has marginally improved in the ODB, which aims to uncover the true prevalence and impact of open data initiatives in areas such as land ownership, crime statistics and company registers. However, given this is such a small change, we will monitor this over time to see if this moves to a more substantial improvement.

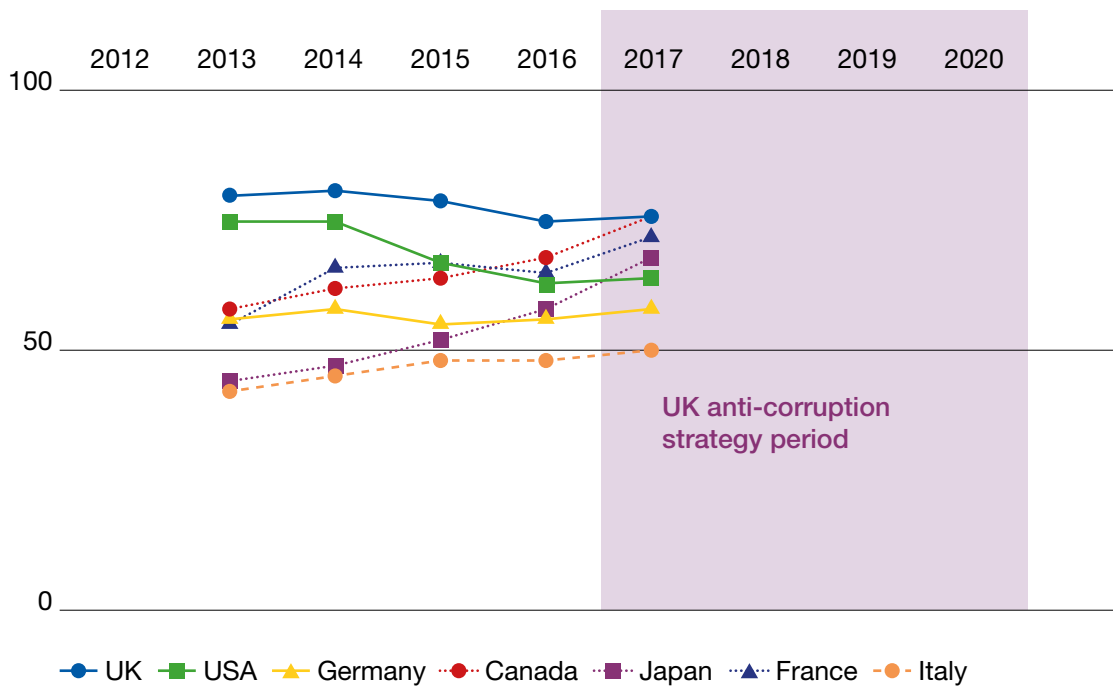
⁸ In a small number of indicators an increase is an unfavourable change or a decrease is favourable. We have noted where this occurs.

⁹ Projected score

Open Budget Survey¹⁰



Open Data Barometer



¹⁰ The International Budget Partnership notes that this drop “is largely because the 2015 survey placed much greater emphasis on the content of specific documents rather than the mere existence of a particular piece of information... the fact that the 2015 OBI score is lower than 2012 primarily reflects changes in the survey methodology rather than a deterioration of budgeting practices” <https://www.internationalbudget.org/wp-content/uploads/OBS2015-CS-United-Kingdom-English.pdf>

2. Measuring the corruption threat to UK national security.

These indicators help measure the scale and frequency of corruption related behaviour within key public institutions, which is essential to understand the scale and reach of corruption in the UK.

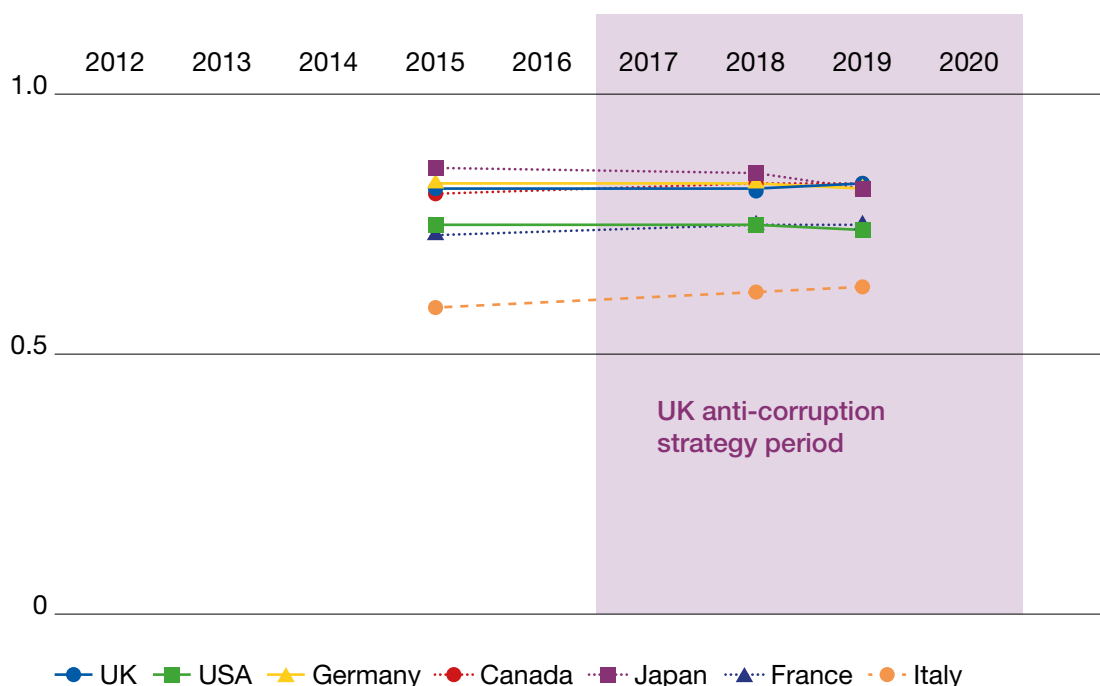
Indicator	Previous Score	Current Score	Rank	Trend
Global Corruption Barometer (GCB) "Would you report an incident of corruption?"	91% (2013)	83% (2016)	NA	-8 pp ¹¹
Global Competitiveness Index (GCI) "In your country, to what extent does organised crime impose costs on businesses?"	5.4 (2018)	4.7 (2019)	NA	-13%
Government Defence Anti-Corruption Index (GDI)	Band A (2015)	Pending	NA	NA
Rule of Law Index (RLI) "absence of corruption"	0.84 (2017/18)	0.83 (2018/19)	11/126	-1%
Rule of Law Index Component 2.3: "Government officials in the police and the military do not use public office for private gain."	0.85 (2017)	0.86 (2019)	20/126	+1%
Rule of Law Index Component 8.5: "Criminal system is free of corruption."	0.84 (2017)	0.87 (2019)	12/126	+4%
Number of corruption related offence reports to the police (ONS) (Table F10) ¹²	148 (12m to Sep 2018)	121 (12m to Sep 2019)	NA	18% decrease ¹¹
FATF Mutual Evaluation 2018 (Assessments of 11 intermediate outcomes)	Highly effective: 4 Substantially effective: 4 Moderately effective: 3			
<p>Measuring the impact of corruption in national security is particularly challenging; however, these indicators portray an overall static picture. The GCB indicates that fewer people would report an incident of corruption, declining from 91% to 83% from 2013 to 2016. This change may reflect less confidence in police action to tackle corruption, or it may indicate an increased lack of awareness of knowing how to report corruption (although it may be due to the slightly different way the question was asked).¹³ We will monitor this over time.</p> <p>The GCI indicator has declined from 5.4 out of 7 in 2018 to 4.7 in 2019, suggesting that organised crime is imposing an increased cost on business. Organised crime is a broad term that covers a range of criminal activity, therefore it is not clear to what extent this reflects an increase in corrupt activities.</p> <p>The GDI aims to measure levels of corruption risk in national defence establishments, the UK is one of only two countries in the world that achieved the highest grade of 'Band A', which indicates a very low risk for corruption in the defence sector. However, this result reflects potential risks of corruption, rather than actual incidences of corruption themselves.</p> <p>The RLI, an expert assessment combined with citizen opinion survey, indicates a marginal decline regarding absence of corruption.</p>				

¹¹ Percentage points

¹² Since the production of this the data for this has been updated.

¹³ While the 2013 survey questionnaire only had "yes" or "no" as possible responses, the 2016 survey questionnaire listed "neither agree nor disagree", "don't know" and "refusal to answer" as possible responses.

Rule of Law Index – ‘Absence of Corruption’



3. Measuring an increase in prosperity at home and abroad.

Corruption can have a significant impact on UK businesses and investment. Understanding these impacts will enable us to protect British businesses at home and abroad more effectively. The indicators below provide some insight into these impacts in the UK.

Indicator	Previous Score	Current Score	Rank	Trend
<u>Doing Business assessment (DBA) – protecting minority investors</u>	75 (2018)	75 (2019)	8	Stable
Global Corruption Barometer (GCB) “How many of you think that UK business executives are involved in corruption?”	49% (2013)	21% (2016)	NA	-28 pp (improvement)
Global Fraud Survey (GFS) – “Do bribery/corrupt practices happen widely in business in your country?” (% yes)	28% (2017)	34% (2018)	NA	6 pp increase (declined)
Global Economic Crime and Fraud Survey (GECFS) – Percentage of U.K. respondents that report having experienced bribery and corruption in the last two years. (% yes)	6% (2016)	23% (2018)	NA	17 pp increase (declined)
<u>Exporting Corruption Report (ECR)</u>	Active Enforcement			

The DBA aims to measure the strength of shareholder protections against misuse of corporate assets by directors as well as shareholder rights, safeguards and transparency. The assessment indicates the UK has remained static since the last assessment and has an overall global ranking 8th.

The GCB indicates that public perception that business executives are corrupt has dramatically improved; dropping from 49% to 21% of people believing business executives engage in corrupt behaviour.

In contrast, the GECFS suggests an increase in businesspeople who report having experienced corruption in the UK over the last two years. It is unclear currently why this may be, though the small sample sizes of the GECFS and the GFS can potentially make the data somewhat volatile over time. In any case, it would be worth exploring further.

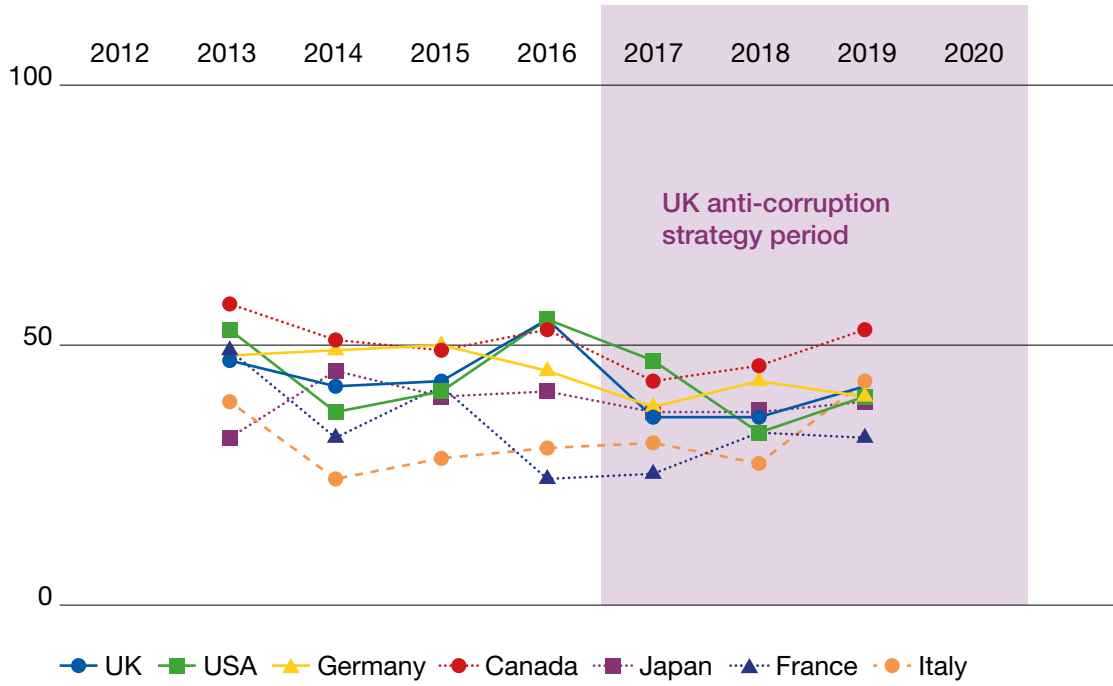
4. Measuring public confidence in the UK's domestic and international institutions.

Public confidence in officials, politicians and electoral process to behave and act in an appropriate manner that serves the interests of the taxpayers is an indication that public office is not being abused. Comprehending this level of trust in the machinery of government enables us to better target policy and interventions. The indicators below provide some insight into this political trust.

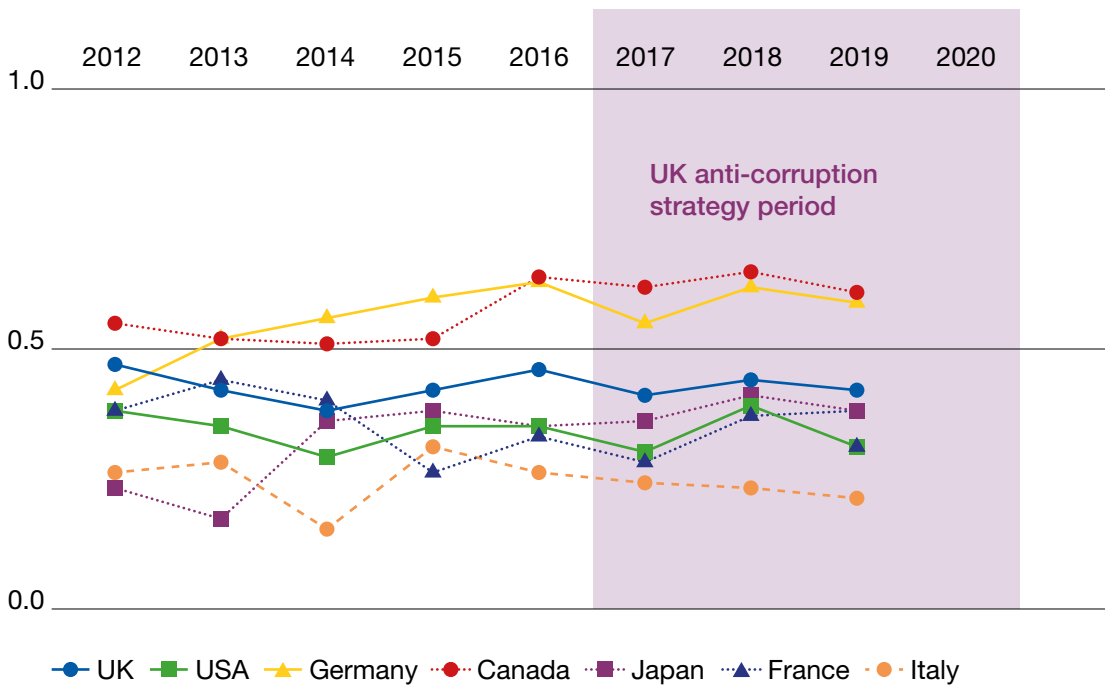
Indicator	Previous Score	Current Score	Rank	Trend
Global Corruption Barometer (GCB) "How is the government handling the fight against corruption?"	10% 'effective to very effective' (2013)	34% 'fairly well to very well' (2016)	NA	+24%
Edelman Trust Barometer (ETB) "How much do you trust government to do what is right?"	36 (2018)	42 (2019)		+17%
Gallup World Poll (GWP) "Do you have confidence in the honesty of elections?"	0.65 (2017)	0.66 (2018)		+2%
Gallup World Poll "Do you have confidence in the national government?"	0.44 (2018)	0.42 (2019)	108/167	-5%
Gallup World Poll "Public Trust in Politicians"	0.64 (2018)	0.64 (2019)	17/167	Stable
Gallup World Poll "Use of public office for private gain"	0.85 (2018)	0.85 (2019)	12/167	Stable

The Edelman Trust Barometer (ETB) and the Gallup World Poll (GWP) are useful indicators which are regularly produced to provide an idea of public opinion. They suggest there is an overall trend that trust has been largely stable over the last couple of years with marginal improvement in confidence in national government and the honesty of elections. Two of the charts below indicate fairly stable trends for the UK in terms of confidence in national government and use of public office. The trust barometer however shows a decline in trust in 2016 followed by a slow improvement since. Conversely, public trust in politicians has been seen gradual improvement since 2012 through to 2019; although it is unclear if this indicates perception of less corruption, or more trust in general.

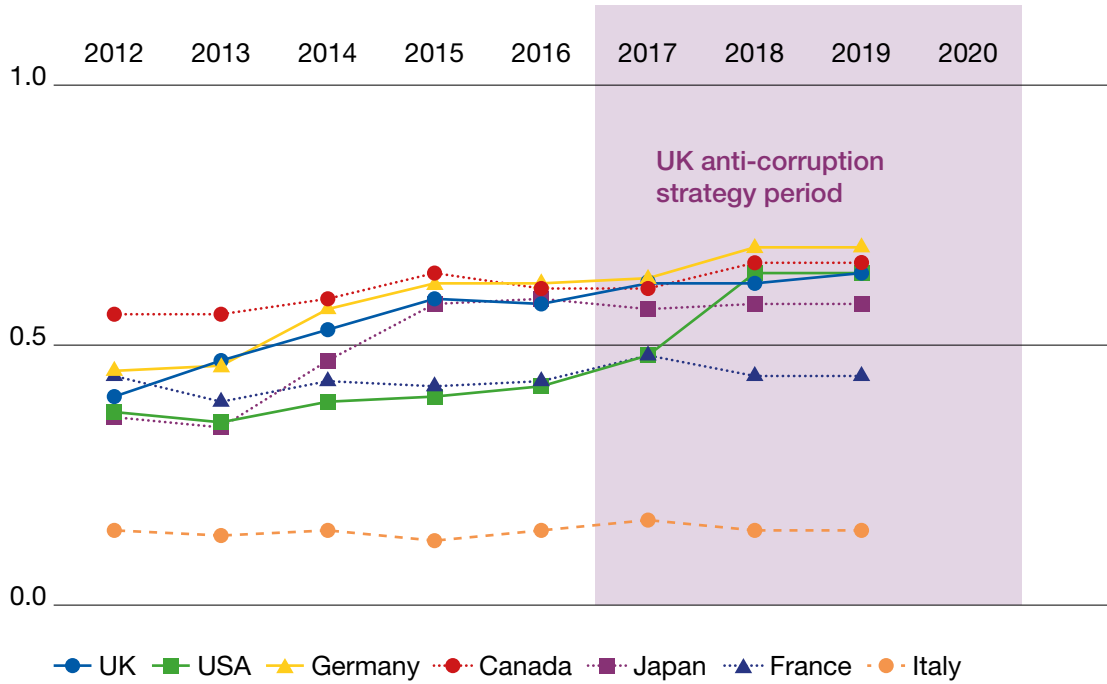
Edelman Trust Barometer: Trust in Government (%)



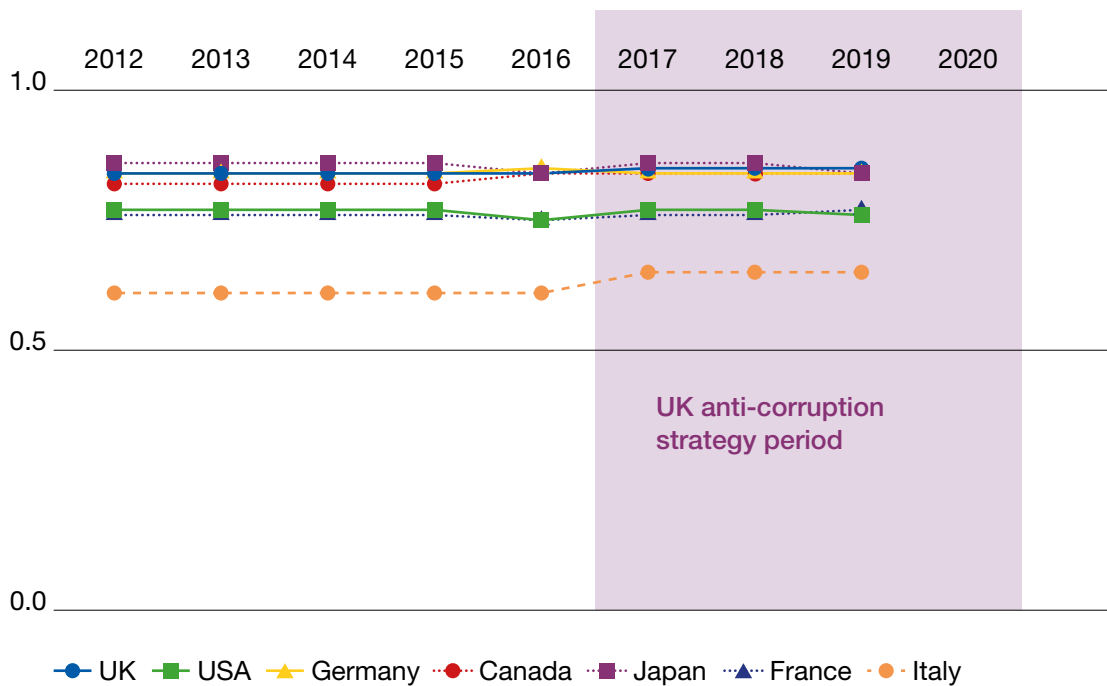
Gallup World Poll: "Do you have confidence in the national government?"



Gallup World Poll: “Public Trust in Politicians”



Gallup World Poll: “Use of public office for private gain”



Global composite indices; measuring expert opinion of corruption

This group of composite corruption indices is primarily intended to provide background context to the UK's anti-corruption performance and reflection expert opinion surveys. The scores and values of these indices are unlikely to change dramatically in the short to medium term but offer a useful comparative impression of how the UK performs relative to other countries in terms of controlling corruption.

Indicator	Previous score	Current score	Ranking	% change
The Corruption Perception Index (CPI)	80 (2018)	77 (2019)	12/180	-4%
<u>Control of Corruption Index</u>	1.84 (2017)	1.83 (2018)	93rd percentile	-0.9%
<u>Index of Public Integrity (IPI)</u>	9.10 (2017)	8.83 (2019)	8/109	-3%
<u>The Financial Secrecy Index (FSI)</u>	41 (2015)	42 (2018)	23/118 ¹⁴	+2% (decline)

We see a relatively stable picture in terms of the UK's performance on global composite corruption indices, with only minor declines with the selected indicators.

The CPI, a composite measure of external surveys with experts and business executives, showed a statistically insignificant drop in the UK's score. However, with a score of 77 the UK fairs well and is ranked 12th among the 180 countries measured. The drop is driven by lower ratings in the World Economic Forum's Executive Opinion Survey, which measures bribery in different sectors as well as the divergence of public funds.

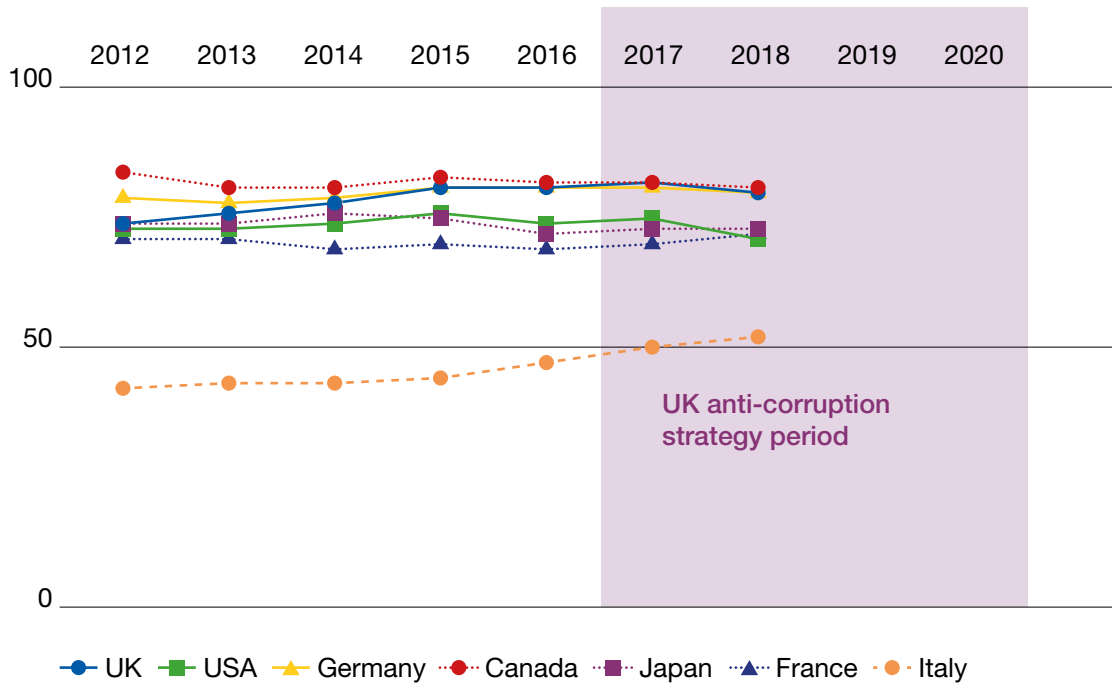
The biannual IPI which measures judicial independence, administrative burden, trade openness, budget transparency, e-citizenship (ability of citizens to use online tools and social media) and freedom of the press has shown a marginal shift downwards for the UK. This represents a noticeable worsening in terms of the sub-categories of judicial independence and e-citizenship, offset by small increases in budget transparency and trade openness.

The CCI measures perceptions of the extent to which public power is exercised for private gain, including petty and grand corruption, as well as state capture. The UK's performance has been largely stable over the past five years, and it is currently in the 93rd percentile rank (where 100 corresponds to the highest rank).

The UK's FSI score has remained relatively static since it last reported in 2015, with and the UK had the joint lowest secrecy score (which equates to best performance) of any of the 118 countries and territories assessed in 2018. However, the UK's market share of global financial services results in in our weighted score ranking us 23rd least transparent country. Our leadership of the beneficial ownership campaign and the recent announcements from the Crown Dependencies and certain Overseas Territories are aimed at addressing many of the issues assessed by the FSI.

¹⁴ The reason that UK is ranked 23rd on the index is as a result FSI methodology, which weights jurisdictions based on their share in global financial services exports

Corruption Perception Index



Methodology and process – criteria for indicator selection

We worked closely with the U4 Helpdesk to identify a range of indicators that could be used to provide insight to the scale and nature of corruption in the UK. The purpose of the indicators is to provide insight on the impact of corruption on the three key pillars of the Anti-Corruption Strategy: national security, prosperity and trust in public institutions. Once a comprehensive list of potential indicators was identified, we applied the below criteria to guide our selection of which indicators to use. We then consulted with Transparency International and wider civil society and Government Departments to determine what other indicators could be used and ensure we provided a balanced view.

Note: the indicators used are not an exhaustive list, there may be others which could be used. The U4 Helpdesk identified a range of indicators at the request of JACU, we then applied the below criteria to select the final list of indicators. The approach is designed to be flexible with scope for appropriate dedications, additions and alterations over the lifespan of the AC Strategy:

- being **relevant** and **specific**. Indicators need to specifically speak to one of the three pillars of the UK Anti-Corruption strategy, in terms of understanding impact of corruption on: national security, prosperity and trust in institutions;
- provide a **balanced**, considered and non-biased view. Where possible, indicators should not be biased and be produced by independent non-political bodies, academics or other independent organisations;
- providing enough sensitivity and detail, so that **actionable** policy or interventions can be identified. Indicators should be at least somewhat sensitive to policy interventions in the medium term, rather than consistently immutable;
- being **transparent** and **accessible**. The methodology used to construct and use indicators should ideally be publicly available, as should the raw data;

- **avoid duplication**, to ensure an even spread as far as possible across the pillars; and
- being produced **frequently** so that multiple measurements and assessment can be taken. Indicators that are regularly produced by reliable bodies are preferable, as time series data allows for monitoring performance and making comparisons over time.

We have tried to select a range of indicators that provide a broad and varied view; we have attempted to provide different data types: from expert opinion surveys, to numbers of allegations of corruption related offences in the UK, as well as perceptions of corruption among citizens and businesspeople. The purpose is to provide a range of perspectives and to take a more holistic view of different measurements, as this will result in a deeper appreciation of corruption levels in the UK. The reliability of the data underpinning the indicators outlined in this document vary and the findings should be interpreted with this in mind. In places we have highlighted key methodological issues which may impact on the interpretation of the data, but for more information we suggest you view the underlying source data by clicking on the relevant links in the table above.

In the longer term we hope to utilise information from across Government and law enforcement to collect administrative data to potentially add to these indicators and enhance the evidence base on corruption.

ANNEX B

Commitment tracker

	On track or completed
	Progressing with risk that deadline(s) may be missed and/or with some risk to delivery
	Off track with deadline(s) expected to be missed and/or with serious risk to delivery

Priority Area 1: Reduce the insider threat in high risk domestic sectors

Goal 1 – Reduce vulnerability to corrupt insiders in four critical sectors

No.	Commitment	Department/ Agency	Status	Comment
1.1	<p>Implement a comprehensive programme of work to understand, manage and mitigate the vulnerabilities that could be exploited by corrupt insiders at UK airports, maritime ports and international rail terminals (UK Ports).</p> <ul style="list-style-type: none"> a. identify and manage the risks posed by insiders at UK Ports b. strengthen the whole of government response to the insider threat by bringing together key departments and agencies in a multi-faceted approach to tackling this threat c. improve the way information is shared and actioned amongst key partners d. work with commercial operators at UK Ports to improve physical security e. share best practice amongst both the public and private sectors working in the borders environment and to improve the security culture f. make better use of technology to detect and deter corrupt activity at UK Port 	Home Office		Ongoing programme of work being implemented across government
1.2	<p>Develop a new anti-corruption strategy for prisons and probation in England and Wales in 2017, to ensure our aims and approach meet the nature of the current threat and will inform a range of future work to address vulnerabilities.</p> <ul style="list-style-type: none"> a. improve training in HMPPS, to strengthen staff resilience and reduce risk b. improve intelligence sharing capabilities between HMPPS and law enforcement so we are more effective in identifying corruptors in custody, and in taking action in response c. continue to improve the way that we identify and counter the activities of corrupt staff and their criminal associates (for example, we are working to improve reporting of suspected corruption by raising awareness among staff in the National Probation Service, and Community Rehabilitation Companies) 	Ministry of Justice		<p>Anti-corruption strategy implementation work underway</p> <p>See Review 1 for details</p>

Priority Area 1: Reduce the insider threat in high risk domestic sectors

1.3	<p>Increase transparency and improve accountability in policing.</p> <p>a. implementing the provisions of Part 2 of the Policing and Crime Act 2017 during the next 18 months, notably to overhaul the police complaints and discipline systems</p> <p>b. extending disciplinary proceedings to former police officers in serious misconduct cases and creating a new police barred list, including publication of details of officers who have been barred from policing to be delivered by end of 2017</p> <p>c. publishing a national register on police Chief Officers' pay and rewards, gifts, hospitality and second interests to increase transparency and improve disclosure of additional interests</p>	Home Office		<p>Implementation of (a) required secondary legislation and was delayed due to pressures on securing Parliamentary time¹⁵</p> <p>(b) and (c) delivered in Year 1</p>
1.4	<p>Publish by the end of 2017 new professional guidance and Codes of Practice on Vetting requirements for individuals serving in policing (College of Policing).</p>	Home Office		<p>Completed. Code of Practice on Vetting and accompanying Authorised Professional Practice (APP) completed in Year 1. First review of the APP published in <u>May 2019</u></p>
1.5	<p>Strengthen protections for police whistle-blowers by implementing reforms included in the Policing and Crime Act 2017 and amending regulations in 2019.</p>	Home Office		<p>Implementation delayed due to same constraints of Commitment 1.3 above</p>
1.6	<p>Implement the national strategy for preventing and addressing abuse of position by police personnel for sexual gain (National Police Chief's Council), and new College of Policing guidance on maintaining professional boundaries across all police forces throughout 2017/18.</p>	Home Office		<p>National strategy implemented in Year 1. Spotlight report published in September 2019</p>
1.7	<p>Reform the Independent Police Complaints Commission, which will be known from 2018 as the Independent Office for Police Conduct (IOPC) through:</p> <p>a. reformed corporate governance and a single line of accountability for investigations, enabling the organisation to deliver more investigations into serious allegations</p> <p>b. strengthened powers as part of the package delivered through the Policing and Crime Act to overhaul the police complaints and discipline systems</p>	Home Office		<p>(a) completed in Year 1</p> <p>Implementation of (b) delayed due to same constraints of Commitment 1.3 above¹⁵</p>
1.8	<p>Undertake increased joint working between the Ministry of Defence, national law enforcement and police partners to further enhance coordination of intelligence-led operations against high priority corruption targets, in order to increase deterrence, disruption and detection.</p>	Ministry of Defence		<p>Implemented. See Review 1 above</p>

¹⁵ Completed in 2020 and now "green" for Year 3

Priority Area 1: Reduce the insider threat in high risk domestic sectors

1.9	<p>Deliver a programme of work to address the vulnerability posed by corrupt employees in the defence sector to inform future policy and put in place appropriate measures to mitigate the threat.</p> <p>a. ensuring staff are aware of the risks posed by corrupt insiders</p> <p>b. sharing best practice and improving the security culture amongst staff</p> <p>c. working with major stakeholders within the Ministry of Defence to improve the effectiveness of stock control and accounting systems used to manage sensitive items that are attractive to criminals and terrorist organisations</p> <p>d. making better use of technology to track sensitive items</p> <p>e. establishing a new team, responsible to the Permanent Secretary, to independently assure the processes for the through-life management and control of sensitive defence items</p>	Ministry of Defence		Programme of work being implemented. See Review 1
Goal 2 – Increased awareness of the insider threat across sectors				
1.10	<p>Provide good practice advice on personnel security and tackling the insider threat to organisations that comprise the critical national infrastructure. We will prioritise organisations based on the careful analysis of national security threats and will work closely with a range of partners including the relevant lead government departments, the Centre for the Protection of National Infrastructure (CPNI), and the National Cyber Security Centre.</p>	Centre for Protection of National Infrastructure		Ongoing commitment. Being delivered by CPNI. See Review 1 above
1.11	<p>Consider the findings of the Law Commission Review of the Misconduct in Public Office offence, when published, and set out a government response to the recommendations for reform of common law offence.</p>	Home Office		Review to be published in 2020

Priority Area 2: Strengthen the integrity of the UK as an international centre

Goal 1 – greater transparency over who owns and controls companies and other legal entities

2.1	<p>Ensure law enforcement can use the information contained in the new People with Significant Control (PSC) register and trusts-with-tax-consequences register effectively. We will strengthen channels for regular dialogue and feedback between law enforcement agencies and Companies House, the holders of the PSC register.</p>	Business, Energy and Industrial Strategy		Cross-government dialogue network with Companies House established by Year 1 and currently operational. Law enforcement agencies have access to trusts-with-tax consequences register via open channels with HMRC
2.2	<p>Publish a draft bill in this session of parliament for the establishment of a public register of beneficial ownership of overseas legal entities. It will require them to provide this information when they own or purchase property in the UK or are participating in central government contracts. It will identify, in a public and easily accessible way, the owners and controllers of overseas legal entities that own property in the UK, increasing transparency and trust in the UK property market and supporting law enforcement in their investigations.</p>	Business, Energy and Industrial Strategy; Cabinet Office		<p>Bill was published in draft in Year 1 and pre-legislative scrutiny occurred in 2019</p> <p>See Review 2 for details</p>

Priority Area 2: Strengthen the integrity of the UK as an international centre

2.3	Encourage others to establish similar beneficial ownership registers, and work with the UK's Overseas Territories and Crown Dependencies as they implement their commitments under the 2016 arrangements.	Joint Anti-Corruption Unit, Foreign and Commonwealth Office, Ministry of Justice		Ongoing commitment See Focus on the Global Beneficial Ownership Campaign for details
2.4	Carry out a statutory review of the implementation of the 2016 bilateral company beneficial ownership arrangements with our Overseas Territories and Crown Dependencies for the period ending December 2018. This will assess whether the new arrangements have been effective – in particular whether they have resulted in improved law enforcement outcomes – and to consider if these need to be strengthened further.	Joint Anti-Corruption Unit, Foreign and Commonwealth Office, Ministry of Justice		Statutory review published in <u>July 2019</u> See Review 2 for details
2.5	Continue to work with the OECD Global Forum, and the Financial Action Task Force on the implementation of international standards and the availability of beneficial ownership information in the domestic and cross border context.	Home Office, HM Treasury		Ongoing commitment. Being delivered through the global international beneficial ownership campaign

Goal 2 – stronger law enforcement, prosecutorial and criminal justice action

2.6	Establish a new Minister for Economic Crime in the Home Office.	Home Office		Completed. Brandon Lewis MP appointed Minister of State in July 2019 with the economic crime portfolio ¹⁶
2.7	Introduce a new Ministerial Economic Crime Strategic Board, chaired by the Home Secretary, to oversee strategic priorities, overall performance and align funding and capability development on economic crime.	Home Office		Board established and has held meetings chaired by the Home Secretary and Chancellor of the Exchequer in 2019
2.8	Establish a National Economic Crime Centre, based in the National Crime Agency, with staff from across government and the private sector to: improve the intelligence picture on economic crime; task and coordinate the overall law enforcement response; and increase the UK's ability to investigate high-end economic crime.	Home Office		National Economic Crime Centre launched in Year 1 See Review 2 for details
2.9	Implement all key elements of the Criminal Finances Act, including Unexplained Wealth Orders, by the end of April 2018 (subject to parliamentary time).	Home Office		The Criminal Finances Act came into effect in 2018 for all parts of the UK except Northern Ireland (as these related to devolved matters which await legislative consent in Northern Ireland)

¹⁶ James Brokenshire MP appointed February 2020

Priority Area 2: Strengthen the integrity of the UK as an international centre

2.10	Work with partners to strengthen cooperation with international partners on recovering criminal assets, building on the first meeting of the Global Forum for Asset Recovery in December 2017.	Home Office		Ongoing commitment delivered through ongoing involvement with the UN Office on Drugs and Crime and the Africa-Europe Dialogue on Asset Recovery <u>Asset Recovery Action Plan</u> published in 2019 See Review 2 for details
2.11	Work with partners to ensure the newly established International Anti-Corruption Co-ordination Centre becomes a valued and effective resource for law enforcement agencies investigating allegations of grand corruption.	National Crime Agency		Ongoing commitment See Focus on the Global Anti-Corruption Programme for details
2.12	Strengthen our ability to investigate tax evasion and other economic crime, using the multi-agency Joint Financial Analysis Centre to gather data, develop intelligence and conduct analysis.	National Crime Agency		Ongoing commitment now being delivered through NECC See Review 2 for details
2.13	Amend Schedule 3 of the Crime and Courts Act to add the SFO to the list of organisations the Director General of the NCA can directly task to investigate a case of economic crime.	Home Office		Due to restrictions on Parliamentary time due to EU Exit, this order ¹⁷ has been postponed
2.14	Consider the findings of the Call For Evidence that in January 2017 proposed extending corporate criminal liability beyond bribery and tax evasion to wider economic crimes. If appropriate we will consult on how new offences might be introduced.	Ministry of Justice		The findings of the Call for Evidence, which proposed a number of options including extending the 'failure to prevent' offence beyond bribery and tax evasion to wider economic crimes, have been analysed. Ongoing commitment to publish response and way ahead
2.15	Continue to support the Office of Financial Sanctions Implementation (OFSI) in imposing monetary penalties for financial sanctions breaches, following the publication of guidance on how they will be used.	HM Treasury		OFSI announced its first ever penalties for breaches of financial sanctions in 2019
2.16	Increase industry and general public awareness of financial sanctions to prevent breaches; including awareness of industry's reporting obligations to OFSI.	HM Treasury		<u>Guidance on post Brexit financial sanctions</u> published in February 2019 See Review 2 for details

¹⁷ This order will add the SFO to the list of organisations that the Director of the NCA can directly task to "perform a specific task"

Priority Area 2: Strengthen the integrity of the UK as an international centre

2.17	Continue to assess the effectiveness of financial sanctions to prevent breaches, including awareness of industry's reporting obligations to OFSI.	HM Treasury		Ongoing commitment. OFSI conducts and annual review of financial sanctions breaches and analyses trends See Review 2 for details
2.18	Strengthen law enforcement capacity and capability by implementing an innovative counter bribery and corruption training programme from December 2017. The City of London Police Economic Crime Academy is already providing a new programme to develop investigators' skills in law enforcement agencies in the UK and overseas.	City of London Police		Delivered through the City of London Police Crime Academy See Review 2 for details

Goal 3 – further enhanced anti-money laundering and counter-terrorist financing capability

2.19	Work with supervisors to fully embed the new Money Laundering Regulations that were introduced in June 2017, which give effect to the revised FATF standards and transpose the 4th EU Money Laundering Directive. These regulations require firms to apply enhanced due diligence to all politically exposed persons (PEPs) on a risk-sensitive basis, and are complemented by guidance published by the Financial Conduct Authority (FCA) in July 2017 which clarifies the risk based approach that firms should take in their treatment of PEPs.	HM Treasury		Completed in Year 1
2.20	Create a new Office for Professional Body Anti-Money Laundering Supervision (OPBAS), hosted by the Financial Conduct Authority (FCA), to help and ensure that professional body AML supervisors implement their supervisory obligations to a consistently high standard, and work across the regime to share best practice and facilitate the flow of information with law enforcement. OPBAS will be fully operational by the beginning of 2018.	Financial Conduct Authority		Completed in Year 1 See Review 2 for details

Goal 4 – stronger public-private partnerships, to share information and improve targeting of those who pose greatest risk

2.21	Increase the analytical capability of the Joint Money Laundering Intelligence Taskforce, and continue to expand its membership to include more banks and other financial services firms.	National Crime Agency		Ongoing commitment. Being delivered through JMLIT See Review 2 for details
2.22	Continue to strengthen our response to international illicit financial flows and money laundering, working with other jurisdictions to encourage them to establish or enhance public-private information sharing partnerships, and to share best practice. We will also work together to improve information sharing between national public-private partnerships, including through the UK's membership of the FATF.	Home Office		Ongoing commitment. Being delivered through the international illicit finance campaign

Priority Area 2: Strengthen the integrity of the UK as an international centre

2.23	Build upon the success of the Joint Fraud Taskforce to tackle volume fraud. This includes improving the law enforcement response to fraud at the local, regional and national levels, including better utilisation of industry data to tackle the most prevalent fraudsters.	Home Office		Ongoing commitment. Being delivered through JFT See Review 2 for details
2.24	Reform the Suspicious Activity Reports regime, upgrading capabilities (including IT) and making the necessary legislative, operational and technical changes.	Home Office		Ongoing commitment. Work in progress to devise a three to five-year programme 2019 activity includes approval of business case, recruitment of programme resources, commencement of IT transformation project and building the SARS blueprint
2.25	Deliver prevention campaigns to professionals in the regulated sector to raise awareness of money laundering risks and the actions to mitigate them in 2017-18, in the context of our risk-based and proportionate regulatory regime. We will report on the reach of these campaigns and their impact, for example self-reported behavioural shifts in response.	Home Office		Being delivered through the <i>Flag it Up</i> campaign and the Economic Crime Plan See Review 2 for details

Priority Area 3: Promote integrity across the public and private sector

Goal 1 – Greater public sector resilience against the threat of corruption

3.1	In the next two years, establish a Counter-Fraud and Corruption Profession across the Civil Service, based on professional standards and competencies that include bribery and corruption.	Cabinet Office		Profession launched in Year 1. Profession currently has 4305 and is being opened up to local government
3.2	Assign a senior lead in every central government department for bribery and corruption, who is a trained and qualified member of the Civil Service Counter Fraud Profession.	Cabinet Office		Standards, guidance and outline training programme for the leads developed
3.3	Include in the government's Counter Fraud Functional Standards counter corruption standards that all departments will follow.	Cabinet Office		Completed in Year 1. See Review 3 for details on progress
3.4	Publish details of the amount of fraud and corruption detected every year in central government and, alongside this, the details of which departments are following the Counter Fraud and Corruption Functional Standards.	Cabinet Office		Annual commitment. 2019 Report published
3.5	Encourage councils to take part in new joint investigative working arrangements between the Department for Work and Pensions and local authority investigators on benefit fraud and related local government frauds.	Ministry of Housing, Communities and Local Government		Complete See Review 3 for details

Priority Area 3: Promote integrity across the public and private sector

3.6	Introduce a number of pilot schemes at local government elections in 2018 (working with key partner organisations, including the Electoral Commission and the Association of Electoral Administrators), to test the impact of asking voters to present certain forms of photographic and non-photographic identification. This was a recommendation in Sir Eric Pickles 2016 review into electoral fraud.	Cabinet Office		Completed in Year 1
Goal 2 – A more open government that is trusted by citizens, with robust protections for whistle-blowers				
3.7	Implement a revised Freedom of Information Act Code of Practice in Spring 2018 (an Open Government Partnership UK National Action Plan commitment).	Cabinet Office		Completed in Year 1
3.8	Actively engage with the 2017 Council of Europe Group of States against Corruption (GRECO) evaluation of the UK. We are the first country to undergo a GRECO evaluation on prevention of corruption in the highest levels of government and law enforcement agencies. We will use the findings to compare the UK's propriety and ethics standards against other countries and assess the mechanisms in UK law enforcement agencies to prevent internal corruption. The UK Government will publish GRECO's recommendations and details of the actions we take in response.	Ministry of Justice		UK update published. Update due to be discussed and assessed at a future GRECO plenary
3.9	Review in 2017-18 the effectiveness of BEIS' Whistleblowing Guidance for Employers and Code of Practice. This aims to ensure that more employers follow good practice when responding to disclosures relating to whistleblowing.	Business, Energy and Industrial Strategy		Review completed in May 2018 but the response rate from business was insufficient to reach conclusions. This review will now be included in the wider review in Commitment 3.10
3.10	Review in 2018/19 the recent changes to the whistleblowing framework, as introduced by the Enterprise and Regulatory Reform Act 2013.	Business, Energy and Industrial Strategy		Review delayed (see Priority 3 for details) Timing and scope of Review to be considered in 2020.
3.11	Implement legislation to provide protection to whistle-blowers making job applications in the health sector and in children's social care at the earliest opportunity.	Department for Health, Department for Education		Completed for health sector in Year 1 Provisions for the children's social care sector being scoped out
Goal 3 – Strengthened UK private sector of integrity				
3.12	Investigate weaknesses in our business frameworks if they arise, and take action where necessary. For example, in March 2017 the government completed a call for evidence on the use of limited partnerships, in response to concerns that they may be vulnerable to misuse. The government is actively considering options and will announce next steps soon.	Business, Energy and Industrial Strategy		Response to consultation on the reform of limited partnership law published in December 2018 Legislation will be introduced when Parliamentary time allows

Priority Area 3: Promote integrity across the public and private sector

3.13	As the Financial Reporting Council updates its Guidance on the Strategic Report (incorporating changes arising from the UK implementation of the EU Directive on Non-financial reporting), include guidance for disclosures on anti-corruption and bribery.	Business, Energy and Industrial Strategy		Completed in Year 1
3.14	Publish the results of the government's review of the Security Industry Authority (SIA), to examine whether the SIA continues to meet the recognised principles of good corporate governance. The possible regulation of private investigators was included in the scope of the review.	Home Office		Review published in Year 1 See Review 3 for details
Goal 4 – Greater integrity in domestic and international sport				
3.15	Implement the provisions in the cross-government Sport Strategy, Sporting Future, to protect the integrity of sport.	Department of Digital, Culture, Media and Sport		Ongoing commitment. Provisions are being implemented by DCMS including securing funding for the UK Anti-Doping
3.16	Undertake a tailored review of UK Anti-Doping to assess how it is placed to respond to future anti-doping challenges, and will report in 2018.	Department of Digital, Culture, Media and Sport		Review published in Year 1
3.17	Sign the Council of Europe Convention on the Manipulation of Sports Competitions in 2018.	Department of Digital, Culture, Media and Sport		Convention signed in Year 1
3.18	Continue to support the International Partnership Against Corruption in Sport, and host a meeting in 2018.	Department of Digital, Culture, Media and Sport		IPACS meeting hosted in Year 1 See Review 3 for details

Priority Area 4: Reduce corruption in public procurement and grants

Goal 1 – greater procurement transparency, enabling better identification and mitigation of corruption risks, market distortion and anti-competitive behaviour

4.1	Undertake a review of procurement risks in local government by the end of 2018. This will be led by the Secretary of State for the Department of Communities and Local Government in collaboration with the Prime Minister's Anti-Corruption Champion.	Ministry of Housing, Communities and Local Government		Report due to be published in early 2020 See Review 4 for details
4.2	Take steps to ensure publication of contract award notices as required by the Public Contracts Regulations 2015. This will include the Crown Commercial Service formally reminding contracting authorities of their obligation to publish these in Contracts Finder and the Official Journal of the European Union by January 2018.	Crown Commercial Service		Completed in Year 1
4.3	Work with international partners, through the Contracting 5 to establish a joint working group and implement a detailed work plan.	Cabinet Office		Ongoing commitment Colombian presidency in 2019 focused on competition, SME participation and development of anti-corruption tools

Priority Area 4: Reduce corruption in public procurement and grants

4.4	Explore ways to deliver a more collaborative approach in the Ministry of Defence's supply chain, with the aim of entrenching a strong anti-corruption culture. This will include hosting a conference with key suppliers in 2017 to identify opportunities for closer anti-corruption working.	Ministry of Defence		Ongoing commitment. Conference held in December 2017
4.5	Use UK Government Digital expertise to support the digital transformation of government procurement services in four countries. These countries will draw on the UK's experience in establishing the Digital Market Place (an online platform that all public sector organisations can use to find and buy cloud-based services).	Cabinet Office		Ongoing commitment. See Review 4 for details and Focus on the Global Anti-Corruption Programme
Goal 2 – strengthened awareness and capability within contracting authorities.				
4.6	Identify organisations and businesses under contract or receiving grants in open data releases using reusable unique identifiers, by default. We will do this by starting to use common data labels (termed unique identifiers). These already exist for many types of entity (for example, company number or charity number) and increasing their use will enable users of open data to identify entities within and across data sets.	Cabinet Office		Ongoing commitment. Activity in 2019 includes exploration of unique identifiers on government grants data, publication of grants data to open data standards and rolling out of data visualisation dashboard
4.7	Help procurers detect and deter illegal bid rigging by increasing the uptake of the Competition and Market Authority's (CMA) online training and guidance materials.	Competitions and Market Authority		Ongoing commitment <u>Online training and materials available and promoted through 2019 outreach campaign, presentations and guidance</u>
4.8	Promote use of the CMA's new tool that analyses bid data for signs of suspicious activity, measuring the level of uptake.	Competitions and Market Authority		Ongoing commitment. In-depth analysis of the tool was submitted in January 2019, detailing several issues to be addressed
4.9	Encourage procurers to investigate and report possible cartels, measuring the number of leads received by CMA.	Competitions and Market Authority		Ongoing commitment. To follow resolution of issues relating to the CMA tool
4.10	Undertake data analytics activity using Random Sampling exercises in some areas of government's commercial activities to actively look for the risk of fraud.	Cabinet Office		Fraud Measurement and Assurance across three strands were undertaken and completed in 2019. This is being developed as a rolling activity across government
4.11	Encourage local authorities to make better use of the National Fraud Initiative data matching service and associated data matching tools, which enable the identification of potential fraud and corruption.	Ministry of Housing, Communities and Local Government; Cabinet Office		Ongoing commitment See Review 4 for details
4.12	The Ministry of Defence will explore the use of anti-corruption data analytics to provide assessments across the whole life of the procurement cycle, utilising data-sharing approaches such as the National Fraud Initiative.	Ministry of Defence		Ongoing commitment See Review 4 for details

Priority Area 4: Reduce corruption in public procurement and grants

Goal 3 – greater confidence in efficient and legitimate contract management

4.13	Trial the Crown Commercial Service, a new conviction check to complement existing provisions in the Public Contracts Regulations 2015 requiring proof that bidders don't have relevant convictions. This will inform executive decisions, and will start in December 2017.	Cabinet Office		Trial completed Year 1 See Review 4 for details
4.14	Produce specific guidance to assist procurers to identify and tackle corruption. By February 2018 we will produce and disseminate guidance to government procurers on applying exclusions in the procurement process, managing conflicts of interest and whistleblowing. We will then work to embed this.	Cabinet Office		Procurement Policy Note and guidance published in February 2019 See Review 4 for details
4.15	Oversee the effectiveness of the new NHS Counter Fraud Authority (established in November 2017).	Department of Health and Social Care		Business plan finalised, framework for local specialists to be published in spring 2020 See Review 4 for details
4.16	Use the Crown Commercial Service's 'Mystery Shopper' function to investigate cases of poor practice with the relevant contracting authority, and make specific recommendations for future action to help drive better behaviours and improve public sector purchasing.	Cabinet Office		Function rebranded to "Public Procurement Review Service" in November 2018 Since the service was introduced over 1730 cases have been received. In 2019 100% of our recommendations were accepted by contracting authorities. Live procurements were adjusted or advice was taken on improving future procurements. This helped suppliers reclaim over £7.3 million from over 328 late payment cases reported to the service No bribery or corruption cases have been received to date. If received, they will be signposted to the relevant authorities

Priority Area 5: Improve the business environment globally

Goal 1 – Reduced impact of corruption on trade and investment internationally

5.1	Support other countries, bilaterally and at multilateral fora, to actively implement international Anti-corruption standards, especially the OECD Anti-Bribery Convention. We will offer support where appropriate to those countries wishing to accede to the convention (including technical assistance and capacity building support).	Joint Anti-Corruption Unit; Foreign and Commonwealth Office		Ongoing commitment <i>See Focus on Multilateral fora</i> for details
5.2	Support policy and principles being promoted by the G20 and the G7 that tackle corruption while eliminating market access barriers.	Joint Anti-Corruption Unit		Ongoing commitment <i>See Focus on Multilateral fora</i> for details
5.3	Consider, as the UK develops its position as an independent trading nation, how transparency and anti-corruption can best be supported through our bilateral and regional trade dialogues and trading agreements.	Department of International Trade		Ongoing commitment. Approach to anti-corruption provisions in FTAs being actively considered, including in consultation with civil society Response on public consultation on possible future FTAs with the US, New Zealand and Australia published
5.4	Work in up to 35 countries to support ‘ease of doing business’ and trade facilitation reforms. This includes capacity building and technical assistance aimed at developing robust legislation and transparency standards, promotion of e-procurement platforms, reducing corruption at ports and border points. This will be delivered through UK government programmes, including through the Prosperity Fund, which makes £1.3 billion available over the next 5 years to promote economic growth in developing countries.	Foreign and Commonwealth Office/ Department for International Development		Ongoing commitment <i>See Focus on Global Anti-Corruption Programme</i> for details

Goal 2 – Enhanced international development finance and export finance practices

5.5	Review CDC’s tax policy annually to make sure that it keeps pace with evolving global standards and remains at the forefront of DFI practice. Under its existing tax policy, CDC will only invest in developing countries through jurisdictions that are committed to the implementation of the international standard for automatic exchange of information in tax matters (AEOI), as well as those that have been rated at least “largely compliant” under the Global Forum’s assessment of jurisdictions’ compliance with the international standard on exchange of information on request (EOIR). The latter will now include, in its next round of jurisdictions’ assessments, a requirement to maintain and exchange beneficial ownership information. CDC’s tax policy includes a commitment to follow the Global Forum standard as it evolves.	Department for International Development		Ongoing commitment. Tax policy review took place in June 2018
-----	--	--	--	---

Priority Area 5: Improve the business environment globally

5.6	Publish more investment information and encourage other Development Finance Institutions to do the same (CDC).	Department for International Development		Investment data base launched in Year 1 See Review 5 for details
5.7	Ensure that investments are underpinned by world-class due diligence and business integrity practice through a strengthened and expanded CDC internal Business Integrity Unit.	Department for International Development		Business integrity unit strengthened and expanded. See Review 5 for details
5.8	Continue to work with like-minded countries at the OECD Export Credit Group to promote higher standards of anti-bribery due diligence by OECD export credit agencies as part of a review expected to conclude in 2017 (UKEF).	UK Export Finance		New Recommendation launched in March 2019 by OECD See Review 5 for details
5.9	Establish a dedicated anti-bribery and corruption due diligence team within UKEF to further strengthen existing capability, and review present policies and procedures to identify any further areas for improvement.	UK Export Finance		Recommendations from the UKEF Financial Crime Compliance Project being implemented See Review 5 for details

Goal 3 – Increased investment with integrity by UK companies in challenging overseas markets

5.10	Ensure that DIT communications, relevant campaigns and other economic diplomacy initiatives highlight the commercial and reputational advantage of trading with integrity.	Department of International Trade		Ongoing commitment. DIT has continued to run extensive international trade promotion and inward investment campaigns which reinforce perceptions of the UK as a stable secure market with a reputation for integrity
5.11	Strengthen the support that is available to companies, building on the services and guidance already offered through government digital platforms. We will work with industry and trade associations to develop initiatives tailored to the needs of UK exporters, including small and medium enterprises and investors.	Department of International Trade; Department for International Development		Being delivered through the Business Integrity Initiative See Review 5 for details
5.12	Produce digital content for the GREAT. GOV.UK digital platform to ensure information on trading with integrity is available and tailored to exporters' needs.	Department of International Trade		Completed in Year 1
5.13	As part of the ongoing Foreign and Commonwealth Office economic diplomacy and law enforcement efforts, provide training and resources that improve the awareness and understanding of corruption amongst UK embassy staff. This will include up-to-date guidance on how to report offences under the UK Bribery Act to law enforcement and guidance on how to promote standards of trade integrity.	Foreign and Commonwealth Office		Being delivered by the FCO via its Diplomatic Academy and online material

Priority Area 5: Improve the business environment globally

Goal 4 – Strengthened business-led collective action to reduce corruption

5.14	Contribute to increased inward investment by supporting business-led initiatives aimed at strengthening anticorruption good practice/approaches, including initiatives that build on the Professional Services Leaders Statement in Support of the London Anti-Corruption Summit, such as those promoted by the Professionals against Corruption.	Joint Anti-Corruption Unit		Being delivered through the Focus on Business See Review 5 for details
5.15	Support collective action, including promoting business-to-business initiatives, action to strengthen supply chains, or to increase transparency, including sponsoring relevant 'Business 20' initiatives at the G20 Anti-Corruption Working Group.	Joint Anti-Corruption Unit		Being delivered through the Focus on Business See Review 5 for details
5.16	Work with industry bodies to facilitate the dissemination of the guidance for SMEs as highlighted in the OECD UK Phase 4 Review. This will also address the recommendations offered by the OECD in that review regarding sufficient dissemination of guidance on compliance procedures.	Department of International Trade		Being delivered through the Business Integrity Initiative See Review 5 for details
5.17	Work with UK business to identify and address specific corruption risks in target markets and sectors, including with reference to the priorities identified in the UK Industrial Strategy.	Joint Anti-Corruption Unit; Department for International Development		Being delivered through the Focus on Business and Business Integrity Initiative See Review 5 for details
5.18	Encourage other countries to establish reporting mechanisms for high value tender processes, building on the experience of Colombia, Ukraine and Panama.	Cabinet Office		Ongoing commitment, being delivered through the Government Digital Service (GDS) Global Digital Marketplace Programme See <i>Focus on the Global Anti-Corruption Programme</i> for details

Priority Area 6: Work with other countries to combat corruption

Goal 1 – enhanced international transparency, especially in beneficial ownership; extractives, public finance and contracting

6.1	Enhance global standards of extractives transparency, including project-level reporting. We will continue to champion the EITI domestically, and will support developing countries to comply with the EITI Standard, including its requirement to include beneficial ownership disclosure by 2020. Building on our early compliance with EU Accounting Directive requirements for mandatory extractives reporting in 2018 we will complete a post-implementation review of the 2014 Reports on Payments to Governments Regulations.	Department for Business, Energy and Industrial Strategy; Department for International Development		Ongoing commitment. Post implementation review completed in Year 1 See Review 6 for details
6.2	Work with like-minded partners to strengthen transparency in the sale by producer governments of oil, gas and minerals by the end of 2018 (an Open Government Partnership UK National Action Plan commitment).	Department for International Development		Ongoing commitment See Review 6 for details

Priority Area 6: Work with other countries to combat corruption

6.3	Support 15 developing countries to make a measurable improvement in their level of fiscal transparency, accountability and citizen participation by 2020 (as measured by the Open Budget Survey scores).	Department for International Development		Ongoing commitment which will be measured against the Open Budget Survey due in spring 2020
6.4	Complete pilots in Ghana and Pakistan to introduce the Common Reporting Standard (CRS), the international standard for the automatic exchange of financial account information, and continue to support capacity building in developing countries through a dedicated unit in HMRC, through the Global Forum, and through the Global Forum's Africa Initiative.	Department for International Development		Ongoing commitment. Completed for Pakistan in Year 1 See Review 6 for details on progress in Ghana
6.5	Support 16 countries to implement more open contracting in public procurement by 2020. We will encourage more countries to commit to openness across the contracting cycle, from planning to tender, award, contract and implementation.	Department for International Development		Ongoing commitment. See Review 6 for details
6.6	Support countries to implement their commitments on company beneficial ownership transparency – such as by establishing national beneficial ownership registers or by subscribing to the Open Ownership Register (a global register which the UK has already supported) in the period up to 2020.	Department for International Development		Ongoing commitment. Entries in the Open Ownership register increased to 5.9m See <i>Focus on the Global Beneficial Ownership Campaign</i> for further details
6.7	Assist and encourage countries to implement a requirement for beneficial ownership disclosure in their public procurement, so that they have working systems in place by 2020.	Joint Anti-Corruption Unit		Options for implementation being considered. Working systems unlikely to be in place by 2020

Goal 2 – reduced levels of corruption in partner countries

6.8	Pilot a strengthened 'whole of UK Government' strategic approach to anti-corruption in selected countries by December 2018.	Home Office; Joint Anti-Corruption Unit		As reported in Year 1, now being delivered through the International Illicit Finances Campaign See Review 6 for details
6.9	Develop new practitioner partnerships on institution integrity, sharing the best of the UK's professional expertise and strong institutions with developing countries.	Department for International Development		Ongoing commitment being delivered through the DFID Partnerships for Development programme Liaison officers in post in Kenya, Nigeria and Tanzania
6.10	Publish our new principles governing compensation to overseas victims of corruption and other economic crime by December 2017, and apply these principles to all relevant cases. We will support countries to deliver their commitment to develop their own principles and continue to raise awareness internationally with the aim of achieving a consensus that overseas victims should benefit from the positive outcomes of bribery and corruption cases.	Serious Fraud Office/ Department for International Development/ Home Office		Principles published in Year 1

Priority Area 6: Work with other countries to combat corruption

6.11	Provide funding to support the design and initial operations of a Centre of FIU Excellence and Leadership under the Egmont Group, the global representative body of Financial Intelligence Units. The centre, to be operational by March 2018, will improve the ability of member countries to identify and address possible corruption and money laundering. This will help reduce the damage caused by losses of illicitly acquired funds from developing countries.	Department for International Development		The Centre was opened in Year 1 See Review 6 for details
6.12	Support the initiative being led by UN Office on Drugs and Crime, Switzerland, and Ethiopia to agree international guidelines for the return of stolen assets.	Department for International Development		Ongoing commitment. See Review 6 for details

Goal 3 – Enhanced action to reduce corruption in fragile and conflicted affected states

6.13	Establish in the UK a Building Integrity Centre of Excellence to the NATO recognised standard by the end of March 2019 to help strengthen the understanding of how corruption and organised crime fuel instability and conflict through analysis and research that contributes to our work in priority countries. We will reflect this in future training and education programmes.	Ministry of Defence		Centre of Excellence being developed but implementation delay until 2020
6.14	Promote greater defence sector transparency through domestic reform in up to four countries, as well as internationally, through support to Transparency International's Defence and Security programme.	Department for International Development		Ongoing commitment delivered through support of Transparency International Defence & Security programme See Review 6 for details
6.15	Promote stronger capabilities to combat corruption in the defence and security sectors in five partner countries or regions by 2019 and support the development of regional Building Integrity centres of excellence in Jordan, Ukraine and Western Balkans.	Ministry of Defence		Completion date postponed to 2020 due to funding and manpower constraints Programme of work ongoing in Afghanistan, Colombia, Ukraine and Occupied Palestine Territories but additional programmes also delivered in the Caribbean and Central Asia

How we will deliver the vision

Improving our understanding of corruption

7.1	Provide a clearer picture of domestic corruption in specific areas by working with experts to expand and improve the evidence base on corruption and its impacts.	Joint Anti-Corruption Unit		Ongoing commitment <i>See Delivering our vision for details</i>
7.2	Review the corruption threat in relation to serious and organised crime as part of the annual NCA National Strategic Assessment of Serious and Organised Crime.	National Crime Agency, Home Office		Ongoing commitment delivered through regular collaboration from key stakeholders including development of the economic crime survey
7.3	Improve how corruption is reported in national crime recording.	Home Office		Ongoing commitment. Data published four times by date of publication of this Report
7.4	Launch a new initiative to provide a reporting mechanism for allegations of bribery and corruption.	Home Office		Digital Policing Portfolio devising mechanics for reporting mechanism to be housed on its website. Delivery expected in 2020
7.5	Improve the quality and breadth of relevant anti-corruption related open data releases by government – this may include drawing on international open data projects such as the Open Data Charter Anti-Corruption Open Up Guide.	Department of Digital, Culture, Media and Sport		Ongoing commitment. Being delivered through the our 4th National Action Plan
7.6	Work with four countries to implement a new ‘Mobilising data for anti-corruption’ programme – which will strengthen collaboration between law enforcement, private sector, civil society and media to improve the quality and use of data in corruption cases.	Department for International Development		Six-month inception phase launched in August 2019 for Kenya, Ghana, Kenya and, potentially, Tanzania Phase will include introductory meetings, reports, due diligence on partnerships, drafting manuals and settling budgets
7.7	Strengthen UK reporting on UN Sustainable Development Goal targets 16.4 and 16.5 (which include commitments to reduce illegal financial flows and to reduce corruption and bribery).	Home Office, Cabinet Office		First voluntary report submitted in June 2019
7.8	Partner with the World Bank to help other countries measure and report their anti-corruption efforts for the UN Sustainable Development Goals.	Department for International Development		Ongoing commitment <i>See Delivering our vision for details</i>
7.9	Support further IMF research into the costs and effective ways of tackling corruption, by providing three years of funding from April 2017.	Department for International Development		Research programme completed, governance and corruption work mainstreamed in IMF which is now rolling out assessments through its own resources
7.10	Commission new research under the DFID Anti-Corruption Evidence Programme, including work to explore the impact of beneficial ownership measures, new forms of commodity based money laundering, and trade and procurement.	Department for International Development		15 new research grants awarded under the Programme

How we will deliver the vision

7.11	Support action research in four countries on how behavioural sciences approaches can be used to identify and stop corruption in supply chains and in public service.	Foreign and Commonwealth Office		<p>Being delivered through the Prosperity Fund Global Anti-Corruption Programme</p> <p>Exploratory work under way on behavioural sciences in target countries undertaking digital procurement reform</p>
Working Together				
8.1	Engage in regular, problem-focused policy dialogue with relevant stakeholders, using both formal and informal means.	Joint Anti-Corruption Unit		Ongoing commitment. Activity for 2019 includes engagement with civil society, national and international stakeholders and through engagement through the PM's Anti-Corruption Champion
8.2	Implement the commitments to strengthened public-private partnership and information sharing in anti-money laundering (set out in Section 3.2).	Home Office		<p>Being delivered in relation to SARs and JMLIT</p> <p>See Review 2</p>
8.3	Honour our Open Government Partnership commitments through close collaboration with civil society and the private sector.	Department for Digital, Culture, Media and Sport		<p>Being delivered through the implementation of the 4th Open Government National Action Plan</p> <p>See <i>Delivering our vision</i> for details</p>
8.4	Strengthen outreach to companies to strengthen integrity in business (as set out in section 3.5).	Home Office; Department of International Trade; Department for International Development		<p>Being delivered through the Business Integrity Initiative</p> <p>See Review 5</p>
8.5	Support civil society in developing countries to champion anti-corruption and accountability issues and to participate in relevant international fora, such as United Nations.	Joint Anti-Corruption Unit; Foreign and Commonwealth Office; Department for International Development		<p>Ongoing commitment. Being delivered through civil society engagement and representation at international fora</p> <p>See also <i>Focus on Global Anti-Corruption Programme</i></p>

How we will deliver the vision

8.6	Engage with leading researchers, businesses and civil society to strengthen the linkages between evidence and policy (as set out in section 4.1).	Joint Anti-Corruption Unit		Ongoing commitment <i>See Delivering our vision</i> for details
8.7	Review options to develop and promote innovative approaches to combatting corruption and consider how to support this going forward.	Joint Anti-Corruption Unit		Ongoing commitment. Being delivered through initiatives such as the exploring the use of powers under the Sanctions and Money Laundering Act 2018 to target perpetrators of corruption
Promoting International Standards and Partnerships				
9.1	Actively engage in 2017/18 with the formal reviews of the UK under the UN Convention Against Corruption, the Council of Europe, and the Financial Action Task Force.	Joint Anti-Corruption Unit; Ministry of Justice		Completed in Year 1
9.2	Work with successive G20 Anti-Corruption Working Group co-Chairs and G7 Presidencies to support G7 and G20 anti-corruption work streams, including on public and private sector integrity, beneficial ownership, multilateral initiatives and capacity building.	Joint Anti-Corruption Unit		Ongoing commitment <i>See Focus on multilateral fora</i> for details
9.3	Work through the G20 to encourage participation in the International Partnership Against Corruption in Sport.	Joint Anti-Corruption Unit; Department of Digital, Culture, Media and Sport		Ongoing commitment <i>See Review 3</i>
9.4	Increase the number of anti-corruption commitments in Open Government Partnership national action plans working through the OGP's Anti-Corruption Working Group.	Department for Culture, Media and Sport/ Department for International Development		Ongoing commitment. Being delivered through the our 4th National Action Plan
9.5	Consider the findings of the OECD Phase 4 evaluation on the UK's implementation of the OECD Anti-Bribery Convention.	Home Office		Mid-term update to <u>OECD on Phase 4 Evaluation</u> published in March 2019 Further update due in March 2021
9.6	Promote the implementation of the UNCAC by supporting the UN Action Plans agreed at the successful UK funded regional meetings in East Africa and South East Asia.	Foreign and Commonwealth Office		Ongoing commitment <i>See Focus on Global Anti-Corruption Programme</i> for details

How we will deliver the vision

9.7	Work with the World Bank to support at least one-third of International Development Association countries to operationalise commitments made as part of their Open Government Partnership agenda – including providing technical assistance and capacity building to enable open contracting and/or beneficial ownership disclosures, where appropriate.	Department for International Development		Grants awarded to nine civil society organisations in their respective countries to facilitate and enhance country efforts to co-create Action Plans and broaden OGP engagement
9.8	Support the International Monetary Fund to complete a comprehensive review of its governance guidance for staff by end 2017, and to issue updated guidance by mid-2018.	HM Treasury		Completed in Year 1
9.9	Work through the UN, Commonwealth, G20, and others to highlight the links between corruption and the Illegal Wildlife Trade as a global concern.	Home Office/ Department for International Development		UNODC through DFID funding helping 6 countries identify potential cases and mentoring 4 of them in subsequent financial investigations for corruption and other economic crimes linked to wildlife and forest crime cases
9.10	Support the Commonwealth Secretariat to promote anti-corruption amongst its membership including at the 2018 Commonwealth Summit meeting in London.	Joint Anti-Corruption Unit		Ongoing commitment <i>See Delivering our vision for details</i>
9.11	Strengthen the capacity of the OECD to support members and developing countries to meet international standards on anti-corruption.	Foreign and Commonwealth Office		Ongoing commitment <i>See Focus on Global Anti-Corruption Programme for details</i>
Monitoring and Reporting on Progress				
10.1	Publish progress updates on the GOV.UK website.	Joint Anti-Corruption Unit		This update is available on the GOV.UK website
10.2	Provide an annual written update to parliament on progress made under the UK Anti-Corruption Strategy, thereby giving it the opportunity to scrutinise our anti-corruption work.	Joint Anti-Corruption Unit		This Update completed this Commitment



HM Government