



HM Government

Progress Update on the UK Anti-Corruption Plan

May 2016

Delivery of the commitments in the UK Anti-Corruption Plan

The UK Anti-Corruption Plan was published in December 2014, to bring together for the first time all of the UK's anti-corruption efforts under one cross-departmental plan.

Corruption harms societies, undermines economic development and threatens democracy. This plan has brought coherence to our efforts to tackle corruption, ensuring we are joined up and collaborative.

The Plan highlights the Government's priorities to: build a better picture of how corruption is affecting our society and economy; strengthen our legal and operational tools and activity; enhance our law enforcement response; deny use of our financial system for those who are trying to abuse it; and step up our efforts internationally.

We have committed to providing this public update to ensure the principle of transparency is applied to all anti-corruption efforts. The Plan is regularly reviewed and scrutinised by the Inter-Ministerial Group on Anti-Corruption, chaired by the Government Anti-Corruption Champion and the Home Office Minister responsible for organised crime. Ministers and heads of the operational agencies in this group both oversee delivery of the plan and continue to set the direction for the Government's domestic and international anti-corruption activity, to ensure that it remains focused, relevant, evolves with the threat and is effective in tackling corruption in its different forms.

Overall progress on delivery

Across government, good progress has been made on implementing the 66 actions in the Plan, with 62 actions having been delivered or on track to be delivered. Implementation of the first national Anti-Corruption Plan has already seen the UK deliver a number of commitments strengthening how we tackle corruption, for example: by introducing a new criminal offence of police corruption; establishing a new International Corruption Unit in the National Crime Agency, to enhance the law enforcement response; and abolishing bearer shares, to make it harder for criminals to launder the proceeds of corruption.

Work is ongoing in government departments with a range of partners to deliver against the remaining actions in the Plan to improve our response to combat corruption both here in the UK and around the world. A new strategy and action plan will be completed by November 2016.

Progress against the Actions

Reporting Period December 2014 – May 2016

| No. | Action | Timescale | Status |
|---|---|--|-----------------|
| Understanding and Raising Awareness of the Risks from Corruption | | | |
| 1 | National Crime Agency to produce regular reporting on the use of bribery and corruption by organised crime | From December 2014 | Complete |
| 2 | National Crime Agency to produce regular alerts on bribery and corruption threats | From December 2014 | Complete |
| 3 | National Crime Agency to establish a national multi-agency intelligence team focussing on serious domestic and international bribery and corruption | April 2015 | Complete |
| 4 | Cabinet Office to work with government departments, civil society organisations and academics to identify data held by the Government which could be published to improve transparency and reduce opportunities for corruption | June 2015 | Complete |
| 5 | Home Office to improve how corruption is recorded in national crime reporting | May 2015 | Behind schedule |
| 6 | Home Office and law enforcement agencies to develop a model for a single reporting mechanism for allegations of corruption | July 2015 | Complete |
| 7 | Home Office to implement a communications plan for improving public awareness of how to report corruption | October 2015 | Behind schedule |
| 8 | Home Office and BIS to consider what more can be done to incentivise and support whistleblowers in cases of bribery and corruption | October 2015 | Complete |
| 9 | BIS to evaluate the implementation of whistleblowing provisions introduced through the Enterprise and Regulatory Reform Act 2013 | This is a five year plan and will conclude in 2018 | On track |
| Tackling Corruption Risks in the UK | | | |
| 10 | Home Office to establish a new offence of 'police corruption' | April 2015 | Complete |
| 11 | Home Office to consult on measures to strengthen the protection for police whistleblowers | December 2014 | Complete |
| 12 | HMIC to publish its inspection into Police Integrity and Corruption | March 2015 | Complete |
| 13 | NOMS to consider the extension of its corruption prevention programme to cover the increasing number of non-directly employed staff delivering custodial services | March 2015 | Complete |
| 14 | New Criminal Procedure Rules to come into effect to allow all Crown Courts to ballot jurors by number, rather than by name where the judge believes this is necessary. This should better protect jurors against the risk of "nobbling" | October 2014 | Complete |

| No. | Action | Timescale | Status |
|-----|---|---|-----------------|
| 15 | Border Force to review its existing anti-corruption capability and identify a package of new measures to enhance its anti-corruption activity | By December 2014 – to be developed throughout 2015 | Complete |
| 16 | National Crime Agency to lead, coordinate and support new operational activity targeting corruption risks at the border | From December 2014 | Complete |
| 17 | Home Office to work with experts in this field to publish a corruption risk assessment template for government departments and agencies aligned with the Cabinet Office fraud risk assessments | May 2015 | Behind schedule |
| 18 | Home Office to promote guidance on managing the threat from corrupt ‘insiders’ to organisations vulnerable to being targeted by organised crime | July 2015 | Complete |
| 19 | Cabinet Office to work with DCLG to promote the counter-corruption and fraud training package to all parts of the public sector | From December 2014 | Complete |
| 20 | House of Commons to approve the proposed amendments to the Guide to the Rules relating to the conduct of Members | March 2015 | Complete |
| 21 | HM Government to secure passage of the Recall of MPs Bill | March 2015 | Complete |
| 22 | Cabinet Office to lead implementation of the new modernised European Public Procurement Directives. Planned transposition of the public procurement directive (i); and the “utilities” and “concessions” Directive (ii) | (i) First Quarter 2015 (ii) Thereafter | Complete |
| 23 | Cabinet Office to consider what further steps are required to make information available on suppliers excluded from public contracts, including the feasibility, potential advantages, and disadvantages of a register of excluded suppliers | August 2015 | Complete |
| 24 | CIPFA to develop a new counter-fraud Centre of Excellence, working with DCLG | December 2015 | Complete |
| 25 | DCLG to fund the development of a new Counter Fraud Strategy for local government – delivered by the local authority network of counter fraud experts (Fighting Fraud Locally), including CIPFA | March 2015 | Complete |
| 26 | Home Office to undertake a number of pilots to better understand the threat that organised crime poses to public procured services in local authorities and take action in partnership, in response to any identified corruption. Home Office and DCLG to work together to ensure good practice from the pilots is shared amongst local authorities and replicated nationally | From October 2014 | On track |
| 27 | MoD to respond to Transparency International recommendations | March 2015 | Complete |

| No. | Action | Timescale | Status |
|---|---|------------------------------------|-----------------|
| 28 | MoD to implement training on the Bribery Act for MoD personnel | From August 2014 | Complete |
| 29 | MoD to implement the package of anti-corruption activities | February 2015 | Complete |
| 30 | DCMS to set out the measures the UK is taking to combat corruption in sport including consideration of ongoing international initiatives | March 2015 | Complete |
| 31 | Gambling Commission and DCMS to implement the Sports Betting Integrity Action Plan | From December 2014 | Complete |
| 32 | Gambling Commission's improved reporting mechanism for sports corruption to contribute to Home Office's proposed single reporting mechanism | December 2014 | Complete |
| 33 | Home Office to introduce a new criminal offence for a person to operate as a private investigator without an SIA issued licence | Subject to Parliamentary timetable | Behind schedule |
| 34 | HM Treasury to commence provisions of the Financial Services (Banking Reform) Act 2013. Prudential Regulation Authority and Financial Conduct Authority to develop rules to put detailed requirements in place | From December 2014 | On track |
| 35 | Fair and Effective Markets Review to report | June 2015 | Complete |
| 36 | The Ministry of Justice will examine the case for a new offence of a corporate failure to prevent economic crime and the rules on establishing corporate criminal liability more widely | June 2015 | Complete |
| The UK Law Enforcement Response to Corruption | | | |
| 37 | A new central bribery and corruption unit will be created within the NCA by bringing together resources from the NCA and the DfID-funded units | April 2015 | Complete |
| 38 | The NCA, working with other agencies, will implement a programme to improve the recruitment and retention of specialists to support corruption investigations | April 2015 | Complete |
| 39 | Cabinet Office to take forward a review of the enforcement response to bribery and corruption more broadly, reporting to the Inter-Ministerial Group on Anti-Corruption | June 2015 | Complete |
| 40 | New guidelines on sentencing in cases of fraud, bribery and money laundering to take effect | From October 2014 | Complete |
| Recovering Stolen Assets and Tackling Illicit Financial Flows Linked to Corruption | | | |
| 41 | DfID to develop proposals for establishing an international rapid reaction team to deploy to countries where regime change has taken place, in order to provide expert assistance in mutual legal assistance and asset recovery | June 2015 | Complete |
| 42 | HM Treasury and Home Office to complete the National Risk Assessment on Money Laundering and Terrorist Financing | Early 2015 | Complete |

| No. | Action | Timescale | Status |
|-----|---|---|----------|
| 43 | HM Treasury and Home Office to produce an Anti-Money Laundering Action Plan to address issues highlighted by the National Risk Assessment on Money Laundering and Terrorist Financing | Following publication of the National Risk Assessment | Complete |
| 44 | HM Treasury to work with AML supervisors to assess their sectors' vulnerability to corrupt PEPs and encourage a risk-based approach to supervision and compliance by firms. HM Treasury to report on progress including through the Annual Report on Anti-Money Laundering Supervision and the National Risk Assessment | From December 2014 | Complete |
| 45 | Home Office to review the Suspicious Activity Reporting regime and to work with the reporting sectors to improve reporting to the National Crime Agency | July 2015 | Complete |
| 46 | Home Office to seek to amend the Proceeds of Crime Act 2002 to enable the use of investigative powers after a confiscation order has been made to facilitate the tracing and recovery of hidden assets | March 2015 | Complete |
| 47 | Home Office to seek to amend the Proceeds of Crime Act 2002, changing the legal test for a restraint order from one of 'reasonable grounds' to one of 'suspicion' in both domestic and international cases | March 2015 | Complete |
| 48 | NCA to increase its liaison with the financial sector to support businesses in reducing their exposure to money laundering and increase the capability of law enforcement to target money launderers | March 2015 | Complete |
| 49 | Home Office to consider further strengthening the financial investigation powers available to law enforcement | June 2015 | Complete |
| 50 | BIS to implement a central register of UK company beneficial ownership information as soon as practicable after the necessary primary and secondary legislation is in place | Subject to Parliamentary timetable | On track |
| 51 | BIS to implement legislation to abolish bearer shares in the Small Business, Enterprise and Employment Bill | Subject to Parliamentary timetable | Complete |
| 52 | The Home Office will work with regulators and professional bodies to deliver targeted communications campaigns aimed at deterring professionals' involvement in serious and organised crime (whether wittingly or unwittingly) and encouraging the adoption of preventative behaviours | From October 2014 | Complete |
| 53 | The NCA will work with regulators and professional bodies to drive the small number of corrupt legal and financial professionals out of the system and provide effective support to the overwhelming majority who want to operate safely within the law | From December 2014 | Complete |
| 54 | Home Office to introduce a new offence of participating in the activities of an organised crime group | March 2015 | Complete |

| No. | Action | Timescale | Status |
|---|---|--------------------------------------|-------------------------------|
| Leading the Fight against International Corruption | | | |
| 55 | DfID and FCO to continue to fund innovative projects on anti-corruption and transparency | During FY2014/2015 | Complete |
| 56 | DfID to review their country-specific anti-corruption strategies to take account of new and emerging threats to UK aid and opportunities for supporting national efforts to reduce corruption in partner countries | December 2015 | Complete |
| 57 | DfID to respond to the recommendations made by ICAI in its report on DfID's approach to anti-corruption | December 2014 | Complete |
| 58 | FCO and DfID will develop a toolkit of interventions to catalyse better HMG coordination to tackle international corruption cases and raise standards | March 2015 | Complete |
| 59 | Cabinet Office to coordinate the UK's international engagement on corruption so that the UK has a coherent approach and clear priorities for raising global anti-corruption standards, particularly through the G7, G20, OECD, GRECO, FATF and United Nations Working Groups on corruption and related issues | From December 2014 | On track |
| 60 | Cabinet Office to coordinate the UK Government's responsibility for peer reviews, including those conducted by the OECD Working Group on Bribery, GRECO and UNCAC, with all relevant government departments supporting the Cabinet Office in responding to the recommendations made in evaluations | From December 2014 | On track |
| 61 | MoJ and FCO to facilitate workshops focused on sharing the UK's experience of drafting and developing the UK Bribery Act in support of other countries as they seek to develop their own anti-bribery legislation | During early 2015 | On track |
| 62 | FCO (i) to update the guidance and information provided to UK Diplomatic Missions overseas; and (ii) to consider how to enhance the training available to FCO staff overseas on dealing with bribery and corruption | (i) December 2014 (ii) March 2015 | (i) Complete (ii) Complete |
| 63 | FCO to work closely with those Overseas Territories with a financial services industry so that they can formally seek extension of the relevant Conventions | By late 2016 | On track |
| 64 | The UK to produce its first EITI report | April 2016 | Complete |
| Implementing the Anti-Corruption Plan | | | |
| 65 | Cabinet Office to establish a new cross-departmental unit on international corruption, providing support to the Government Anti-Corruption Champion | From December 2014 | Complete |
| 66 | Cabinet Office to arrange a regular forum for civil society and business leaders to engage with the Government on corruption and bribery issues | January 2015 | Complete |

Progress against the actions

Understanding and Raising Awareness of the Risks from Corruption

Action 1: National Crime Agency to produce regular reporting on the use of bribery and corruption by organised crime

(from December 2014)

Complete

The NCA, as part of its standard operating procedures for tactical and strategic intelligence analysis, produces regular reporting on this crime type to law enforcement partners on a quarterly basis. In January 2016, it published a detailed report for law enforcement on the use of corruption by serious and organised criminals.

Action 2: National Crime Agency to produce regular alerts on bribery and corruption threats

(from December 2014)

Complete

Following on from the report on the use of corruption by serious and organised criminals, the NCA will shortly be issuing industry alerts to the financial and legal sectors to raise the awareness of risks from corruption. An alert was issued in September 2015 by the NCA on bribery risks faced by local government. In collaboration with the Chartered Institute of Public Finance and Accountancy (CIPFA), this alert was disseminated to UK authorities via the National Anti-Fraud Network. It was published to encourage the reporting of corrupt activities and to reinforce awareness among local authority managers of potential council vulnerabilities under section 7 of The Bribery Act 2010.

Action 3: National Crime Agency to establish a national multi-agency intelligence team focussing on serious domestic and international bribery and corruption

(by April 2015)

Complete

The NCA has established, within its national intelligence hub, a multi-agency intelligence team which focusses on serious domestic and international bribery and corruption.

Action 4: Cabinet Office to work with government departments, civil society organisations and academics to identify data held by the Government which could be published to improve transparency and reduce opportunities for corruption

(by June 2015)

Complete

The Cabinet Office has worked with civil society organisations and others to identify datasets that could be published. This includes the Land Registry publishing which property titles in England and Wales are owned by foreign companies. These have been discussed by the Inter-Ministerial Group on Anti-Corruption.

Action 5: Home Office to improve how corruption is recorded in national crime reporting

(by May 2015)

Behind schedule

The Home Office is consulting with law enforcement partners to improve reporting of criminal activity related to corruption. We need to improve the transparency of reporting and we are exploring how we can use the existing crime recording process to provide an indicator of recorded corruption activity, grouping those offences most closely related to corruption from the annual submission of Home Office crimes recorded by police forces.

The above approach requires a complete set of record level crime data being available from police forces and for all law enforcement stakeholders to agree on the group of offences to be used as an indicator of corruption. Previously forces were only required to submit aggregate data. The Home Office data hub is in the final stages of implementation to provide a complete set of record level data. The majority of the 43 forces (37) will have completed migration to the new system by the end of May. The remaining few forces will do so over the next few months.

Corrupt activity covers a range of offences and can be investigated by a wider range of law enforcement agencies than just the police. We will also explore how we can draw together reports received by those agencies in addition to the police.

Once we have reached agreement on the most appropriate methodology of reporting, implementation will commence from April 2018 to align with an annual crime reporting cycle.

Action 6: Home Office and law enforcement agencies to develop a model for a single reporting mechanism for allegations of corruption (by July 2015)

Complete

In order to make the reporting of bribery and corruption simpler and more widely known the Home Office has developed a single reporting line model that uses a combination of the skills and experience of Crimestoppers and the City of London Police. This preferred model draws on the extensive call handling experience of Crimestoppers and the intelligence development, analysis and dissemination expertise within the City of London Police National Fraud Intelligence Bureau (NFIB).

Our next steps would include securing funding and set up of a project team; conducting a feasibility study; and designing and delivering a full implementation programme in conjunction with a communications campaign to implement the proposed model in 2017/18 at the latest.

Action 7: Home Office to implement a communications plan for improving public awareness of how to report corruption (by October 2015)

Behind schedule

To be aligned with delivery of a single reporting mechanism for allegations of corruption (see action 6).

Action 8: Home Office and BIS to consider what more can be done to incentivise and support whistleblowers in cases of bribery and corruption

(by October 2015)

Complete

Scoping work has been undertaken to assess the use of financial incentives to support whistleblowers in cases of bribery and corruption. We have reviewed findings from numerous reports on the overall whistleblowing framework including: the BIS Government Response on the [Whistleblowing Framework Call for Evidence](#); the Public Concern at Work: [Report on the effectiveness of existing arrangements for workplace whistleblowing in the UK](#); and the [Financial Conduct Authority/Prudential Regulation Authority research and conclusions](#) into the impact of financial incentives on encouraging whistleblowing in the US. The lack of evidence on the successes of financial incentivisation schemes in other countries suggests that providing financial incentives is unlikely to encourage whistleblowers to come forward in cases of bribery and corruption.

Although we do not propose to introduce financial incentives for cases of bribery and corruption, we are exploring how to enhance the support provided to those who report bribery and corruption in specific sectors. For example, we are developing a Serious and Organised Crime Audit Framework, which will include a whistleblowing section, to help Local Authorities to review existing arrangements and identify where changes and improvements can be made to whistleblowing support. Additionally, we have highlighted whistleblowing in the 'Flag it up' awareness campaign on money laundering to deter solicitors and accountants from engaging in money laundering. The campaign is being delivered in partnership with the Home Office, National Crime Agency, the Accountancy Affinity Group, the Law Society and the Solicitors Regulation Authority.

We will also look at using the forthcoming requirement for Prescribed Persons to report, annually, about the protected disclosures they receive to further promote the benefits of whistleblowing.

Action 9: BIS to evaluate the implementation of whistleblowing provisions introduced through the Enterprise and Regulatory Reform Act 2013

(this is a five year plan and will conclude in 2018)

On track

This action is on track as this is a long term commitment - provisions came into force in Summer 2014.

Tackling Corruption Risks in the UK

Action 10: Home Office to establish a new offence of ‘police corruption’

(by April 2015)

Complete

The new offence of police corruption came into force on 13 April 2015. This offence, carrying a maximum penalty of 14 years imprisonment, makes it a specific offence for a police officer (including a special constable and an NCA officer with police powers) to exercise their powers and privileges in a way which is corrupt or otherwise improper.

Action 11: Home Office to consult on measures to strengthen the protection for police whistleblowers

(by December 2014)

Complete

Following a Government consultation, ([Changes to the Police Disciplinary System](#), which ended in January 2015), the Government made changes to the Police (Conduct) Regulations 2012 to make it clear that police whistleblowers are protected from unfair disciplinary action and reprisals against them will not be tolerated. This ensures that the principles set out in the Public Interest Disclosure Act 1998 are incorporated in the police disciplinary process.

In its response to the consultation document, [Improving Police Integrity](#), the Government announced its intention to introduce a number of measures to strengthen protections for police whistleblowers to give them the confidence to report their concerns. In February 2016, the Government introduced a number of provisions relating to whistleblowing as part of the Policing and Crime Bill. The measures include providing the IPCC with the power to conduct an investigation into a concern raised by a whistleblower, without the need for a referral from the police force. In addition, the provisions in the Bill provide for the protection of a whistleblower’s identity.

In March 2016, the College of Policing published national whistleblowing guidance, entitled [Reporting Concerns](#). The guidance sets out the support that should be provided to whistleblowers and how cases should be handled by police forces.

Action 12: HMIC to publish its inspection into Police Integrity and Corruption

(by March 2015)

Complete

Integrity matters: An inspection of arrangements to ensure integrity and to provide the capability to tackle corruption in policing was published on 30 January 2015. The report is available on the [HMIC website](#).

Action 13: NOMS to consider the extension of its corruption prevention programme to cover the increasing number of non-directly employed staff delivering custodial services

(by March 2015)

Complete

In addition to the extensive work underway to combat corruption in prisons, NOMS has committed to deliver a programme of work to assess the nature, appearance and location of the corruption threat from staff in probation along with all non-directly employed staff (NDE) working in prisons or delivering probation services in Community Rehabilitation Companies (CRCs). The work will include: methods of reporting concerns and suspicions, awareness training, and cultural change. Work will also make sure that there are effective relationships with law enforcement agencies and other partners to facilitate timely sharing of information.

The NOMS Corruption Prevention Strategy has been extended to cover the National Probation Service (NPS). A new interim Probation Instruction (PI) has recently been published. The PI has been produced to make sure that NPS staff are fully aware of the NOMS corruption categories, of the current reporting mechanisms available to them and of the correct processes to follow. The NOMS Corruption Prevention Unit has been working alongside NPS colleagues on live corruption cases to secure successful outcomes – either disciplinary or criminal.

Work is underway to extend this strategy to CRCs and further consider the mechanisms and procedures for providing NOMS with assurance that robust and transparent systems are in place within CRCs to identify, investigate and manage corruption allegations.

A new post has been created and filled to lead and coordinate the development and extension of the existing NOMS Corruption Prevention Strategy and operational practices to cover all NPS staff. We will also be seeking to recruit a further manager to lead on work to cover the CRCs which will enable NOMS to further develop and fulfil NOMS' commitment.

Action 14: New Criminal Procedure Rules to come into effect to allow all Crown Courts to ballot jurors by number, rather than by name where the judge believes this is necessary. This should better protect jurors against the risk of “nobbling”

(from October 2014)

Complete

The recommended change has already been made, through the Criminal Procedure Rules 2014 which came into effect on 6 October 2014. Criminal Procedure Rule 38.6 provides that – ‘(4) The court must select the jury by drawing at random each juror’s name from among those so summoned and—

- (a) announcing each name so drawn; or
- (b) announcing an identifying number assigned by the court officer to that person, where the court is satisfied that that is necessary.’

Action 15: Border Force to review its existing anti-corruption capability and identify a package of new measures to enhance its anti-corruption activity

(by December 2014 – to be developed throughout 2015)

Complete

Border Force has reviewed existing practices, considering the anti-corruption activities carried out by others on its behalf and identifying additional activities that could further enhance its anti-corruption capability. Border Force has also considered best practice in other UK and international law enforcement agencies and has developed a proposed suite of integrity initiatives which they are working to progress. These include:

- Working with Home Office Corporate Security to:
 - produce a Home Office Anti-Corruption Strategy and Action Plan to address corruption risks
 - produce a Home Office Communications Plan, aimed at raising awareness and increasing reporting
 - develop training material to further raise awareness amongst both managers and staff
- Working with key partners to:
 - ensure lessons are learned from cases of corruption
- The strengthening of HR policies which, amongst other things, will ensure actual or perceived conflicts of interest are reported by all Border Force employees and are effectively risk assessed.

All of the above will contribute to building and strengthening an integrity culture and will help prevent corruption and protect Border Force.

Action 16: National Crime Agency to lead, coordinate and support new operational activity targeting corruption risks at the border
(from December 2014)

Complete

The NCA is leading, coordinating and supporting activity at the border and chairs a multi-agency sub threat group with the specific purpose of countering corruption at the border. Tackling corruption at the border is included in the NCA - Border Policing Command - Strategic Action Plan. This includes: coordinating intelligence and operational activity through co-location with Border Force, Special Branch and other partner intelligence teams at the border; offering support to investigation partners where NCA specialist capability is required; working closely with public and private sector partners to reduce the vulnerabilities in border security that criminals currently exploit; and raising awareness in the border and transport sector to reduce the risk of them knowingly or unknowingly facilitating organised crime.

Action 17: Home Office to work with experts in this field to publish a corruption risk assessment template for government departments and agencies aligned with the Cabinet Office fraud risk assessments
(by May 2015)

Behind schedule

Following consultation with experts, a template has been designed around the following key considerations: senior leadership commitment; risk identification and prioritisation; corruption control mechanisms; and awareness raising.

Home Office is meeting with Cabinet Office colleagues in May 2016 to ensure that the draft template is aligned with the fraud risk assessment work and will then consult closely with a broad range of stakeholders and government departments during the summer to produce a corruption risk assessment template which will be published on the Gov.uk website for government departments and agencies to use by December 2016.

Action 18: Home Office to promote guidance on managing the threat from corrupt 'insiders', to organisations vulnerable to being targeted by organised crime
(by July 2015)

Complete

Home Office has written to a range of industry bodies, including local authorities and professionals such as solicitors, accountants and banking organisations, to encourage the use of the extensive practical guidance produced by the Centre for the Protection of the

National Infrastructure (CPNI) on managing the threat from corrupt 'insiders'. Further activity will continue as opportunities for promoting such guidance arise.

Action 19: Cabinet Office to work with DCLG to promote the counter-corruption and fraud training package to all parts of the public sector

(ongoing from December 2014)

Complete

Fraud awareness training has been relaunched on the Civil Service Learning website. It provides general fraud awareness and is available to all public sector staff who use Civil Service Training. Departmental fraud champions have been informed of the availability of this training and will provide direction on how this can be best used within their departments.

Action 20: House of Commons to approve the proposed amendments to the Guide to the Rules relating to the conduct of Members

(by March 2015)

Complete

The House of Commons approved the revised Guide to the Rules relating to the conduct of Members on 17 March 2015. Two changes were made to the text of the Guide:

- Paragraph 2 of the previous version of the Guide: 'The Code applies to a Member's conduct which relates in any way to their membership of the House. The Code does not seek to regulate the conduct of Members in their purely private and personal lives or in the conduct of their wider public lives unless such conduct significantly damages the reputation and integrity of the House of Commons as a whole or of its Members generally.' This was replaced with the following paragraph: 'The Code applies to Members in all aspects of their public life. It does not seek to regulate what Members do in their purely private and personal lives'.
- Paragraph 17 of the previous version of the Guide was deleted: 'The Commissioner may not investigate a specific matter under paragraph 16 which relates only to the conduct of a Member in their private and personal lives.'

The revised guide can be found on the [UK Parliament website](#).

Action 21: HM Government to secure passage of the Recall of MPs Bill

(by March 2015)

Complete

Following agreement by both Houses on the text of the Bill, it received Royal Assent on 26 March 2015. The Bill is now an Act of Parliament.

The Bill provides for a recall petition to be triggered if a Member is sentenced to a prison term or is suspended from the House for at least 21 sitting days. If either occurs, the Speaker will give notice to a petition officer, who in turn would give notice to parliamentary electors in the constituency.

A petition would then be open for signing for eight weeks. If at the end of that period at least 10 per cent of eligible electors had signed the petition, the seat would be declared vacant and a by-election would follow. The Member who was recalled could stand in the by-election.

The Bill also introduces rules on the conduct of the recall petition, including campaign spending limits for those supporting and opposing recalling the Member.

Action 22: Cabinet Office to lead implementation of the new modernised European Public Procurement Directives. Planned transposition of the public procurement directive (i); and the “utilities” and “concessions” Directive (ii)

((i) in first Quarter 2015 (ii) Thereafter)

Complete

The Government prioritised the public sector directive for earliest possible implementation, to realise soonest the significant economic benefits (approximately £4bn) from the simplified rules regime in the sector where most public procurement activity takes place. The UK transposed this directive through the Public Contracts Regulations 2015, which came into effect on 26 February 2015, in just 10 months of the 24 allowed by the EU. The Utilities and Concessions Directives have been transposed in accordance with the 2-year EU deadline. The Utilities Contracts Regulations 2016 and the Concession Contracts Regulations 2016 came into force on 18 April 2016.

Action 23: Cabinet Office to consider what further steps are required to make information available on suppliers excluded from public contracts, including the feasibility, potential advantages, and disadvantages of a register of excluded suppliers

(by August 2015)

Complete

Crown Commercial Service (CCS) has supported the implementation of the new rules contained within the Public Contracts Regulations 2015 on supplier exclusions with a face-to-face training programme to over 4,000 procurers, free of charge, and an e-learning package. CCS also published in the Spring of 2015 new guidance on the supplier selection process (which includes detail on mandatory exclusion).

CCS worked closely with European partners to influence the content of a new European Single Procurement Document (ESPD), which will make more transparent the details of suppliers' convictions etc when they apply for public contracts.

It has been determined that use of a register of excluded suppliers is inconsistent with the provisions of The Public Contracts Regulations 2015 (PCRs) which govern UK public sector procurement.

The offences constituting grounds for mandatory exclusion from the procurement process are set out in the PCRs. We will work to ensure final convictions for such offences are available to contracting authorities, to inform decisions about bidder exclusion.

Action 24: CIPFA to develop a new counter-fraud Centre of Excellence, working with DCLG

(by December 2015)

Complete

The CIPFA Counter Fraud Centre (CCFC) was set up in July 2014 and provides tools and services to the public sector and in particular to local authorities to tackle fraud and corruption.

Action 25: DCLG to fund the development of a new Counter Fraud Strategy for local government – delivered by the local authority network of counter fraud experts (Fighting Fraud Locally), including CIPFA

(by March 2015)

Complete

The local government counter fraud and corruption strategy was published on 23 March 2016. It sets out the suggested approach local authorities should take and the main areas of focus over the next three years in order to tackle fraud and corruption. It is primarily aimed at elected members, chief executives, finance directors and those charged with governance in local authorities and contains major recommendations for local authorities and other stakeholders. The strategy can be downloaded from the [GOV.UK website](#).

Action 26: Home Office to undertake a number of pilots to better understand the threat that organised crime poses to public procured services in local authorities; and take action in partnership, in response to any identified corruption. Home Office and DCLG to work together to ensure good practice from the pilots is shared amongst local authorities and replicated nationally

(from October 2014)

On track

In October 2014 the Home Office started a series of pilots in seven areas bringing together the information and powers of local authorities and their police counterparts to understand the organised crime threat to public sector procurement. The pilots compared local authority procurement data against law enforcement organised crime (OC) information in order to identify whether there were organised crime links to local authority suppliers. A small number of links were found that highlighted supplier sectors more likely to be vulnerable to OC. Where links have been found, the local authority and police have been successfully working jointly to ensure the links between OC and local authority suppliers are disrupted.

Areas have responded positively to the pilots, introducing broader measures to reduce their vulnerability in the future, for example: by reviewing and strengthening procurement procedures; working more closely with police; making better use of data to check procurement contracts where there is greater vulnerability; and bolstering the disruption focus of local serious and organised crime multi-agency partnerships.

The Home Office, supported by DCLG, will produce and circulate to local authorities and police forces a summary of the pilot work in spring 2016. It will include lessons learned and good practice to reduce vulnerability for local authorities and police force areas to use nationally.

Action 27: MoD to respond to Transparency International recommendations

(by March 2015)

Complete

Transparency International (TI) produces the Government Defence Anti-Corruption Index, in which they measure the perception of corruption in every Defence establishment in the world. The UK MOD provided evidence of the activities that the UK undertakes to prevent and detect corruption in the UK MOD.

The 2015 index was published on 13 November 2015 and the UK MOD have been placed in category A, that being the least corrupt category. The UK is the only G20 nation to achieve this and one of only two in the world (the other being New Zealand). The response to TI takes into account all of the recommendations suggested by TI as well various other MOD initiatives.

Action 28: MoD to implement training on the Bribery Act for MoD personnel

(ongoing from August 2014)

Complete

Bribery Act Training is now embedded in the MoD fraud awareness and training communications plan. This is a continuous process where face-to-face training is delivered to high corruption risk areas such as procurement.

Action 29: MoD to implement the package of anti-corruption activities

(by February 2015)

Complete

Corruption risk assessment is being delivered across the MoD. It is essential that a full entity level risk assessment is undertaken to fully understand the risks that the MoD faces. The risk assessment included all potential criminality issues as well as control weaknesses. Following the entity level risk assessment, a number of 'deep dives' were and are being carried out to further understand the risk and control environment within certain high risk areas of the MoD. The entity level risk assessment includes interviews, workshops, use of audit reports and investigations data, as well as intelligence. Where risks in the control environment have been identified, action plans have been or are being agreed to mitigate those risks and improve the control environment.

The risk assessment is used to target the MoD's analytical and training and awareness resource. The use of a risk based approach ensures that value for money is achieved through the targeted use of resources in the identified high risk areas.

The MoD has a risk-based communications and analytics plans.

In addition, the MoD have set up 77 Brigade to assist in dealing with operational bribery and corruption. The Defence Academy is working with Transparency International to build integrity in other military establishments.

The MoD works with the US, Australian, Canadian and New Zealand military to share best practice, intelligence and strategy to mitigate the risk of fraud and corruption.

Action 30: DCMS to set out the measures the UK is taking to combat corruption in sport including consideration of ongoing international initiatives

(March 2015)

Complete

DCMS has set out the measures the UK is taking to combat corruption in sport including consideration of ongoing international initiatives in the 'integrity of sport' section of the Government's new Sport Strategy, [Sporting Future: A New Strategy for an Active Nation](#).

Action 31: Gambling Commission and DCMS to implement the Sports Betting Integrity Action Plan

(ongoing from December 2014)

Complete

[The Sports and Sports Betting Integrity Action Plan](#) was published in September 2015.

The Plan outlines Britain's approach to addressing the risks associated with match-fixing and preserving sports betting integrity and recognises that, based on our experiences to date, the threat of match-fixing in Britain is currently low. However, we cannot be complacent; these threats present continual and significant challenges for which we must be prepared. The Plan sets out the framework of collaboration and cooperation agreed by the betting industry, sports governing bodies, law enforcement, sport and betting trade associations, the Gambling Commission and Government to protect Britain's national and international reputation for being a safe place to enjoy sport and sports betting. The Sports Betting Integrity Forum (SBIF) is sharing the learning from this multi-stakeholder approach with other jurisdictions that are developing their own betting integrity strategies. The SBIF is responsible for implementation of the Action Plan and will publish regular progress reports, incorporating new objectives as appropriate to counter emerging threats.

Action 32: Gambling Commission's improved reporting mechanism for sports corruption to contribute to Home Office's proposed single reporting mechanism

(December 2014)

Complete

The Gambling Commission's secure confidential reporting line (phone line and email) has been in place for a number of years through which suspicious activity can be directly sent to its Sports Betting Intelligence Unit. To build and improve on this, the Commission joined forces with Crimestoppers in 2014, when an agreement was reached to pass any reports from the public received by Crimestoppers about sports betting related criminality to the Commission's Sports Betting Intelligence Unit at the same time as they are reported to the police. This arrangement was reaffirmed in 2015. The Commission has contributed to the development of the Home Office's proposed single reporting mechanism by sharing good practice, knowledge and lessons learned from their own reporting line experiences.

Action 33: Home Office to introduce a new criminal offence for a person to operate as a private investigator without an SIA issued licence

(subject to Parliamentary timetable)

Behind schedule

The Government is committed to ensuring the integrity of the private security industry, including private investigators.

In July 2015 the Government announced the first triennial review of the Security Industry Authority (SIA), part of the Government's commitment to ensuring that public bodies continue to have regular independent challenge.

This is a comprehensive review of the work of the SIA as a whole and it was considered appropriate that the proposed private investigator reform be included as part of the review. That review may make further recommendations for legislative change, including in relation to private investigators, which the Government will then consider.

Action 34: HM Treasury to commence provisions of the Financial Services (Banking Reform) Act 2013. Prudential Regulation Authority and Financial Conduct Authority to develop rules to put detailed requirements in place

(from December 2014)

On track

The Senior Managers and Certification Regime came into operation for banks, building societies, credit unions and certain systemically important investment firms on 7 March 2016. The Government has included provisions in the Bank of England and Financial Services Bill, which will receive Royal Assent in May 2016, to extend the Senior Managers and Certification Regime to cover all authorised financial services firms. The provisional timetable is for the regime to come into operation for these additional firms in 2018.

Action 35: Fair and Effective Markets Review to report in June 2015

Complete

The Fair and Effective Markets Review reported in June 2015. The report is available on the [Bank of England website](#).

Among its recommendations was the extension of the Senior Managers and Certification Regime to financial services firms active in fixed income, commodity and currency markets. This is being taken forward as part of the wider work mentioned in Action 34.

Action 36: The Ministry of Justice will examine the case for a new offence of a corporate failure to prevent economic crime and the rules on establishing corporate criminal liability more widely (by June 2015)

Complete

Work is being taken forward in this area by HMRC through public consultation. Following a consultation that closed in October 2015 the current consultation, [Tackling tax evasion: legislation and guidance for a new corporate offence of failure to prevent the criminal facilitation of tax evasion](#), closing on 10 July 2016, proposes a legislative scheme for a failure to prevent offence modelled on the Bribery Act and draft guidance.

A wider examination was completed in June 2015. Ministers decided to pause this work because at that time there had been no prosecutions under the Bribery Act 2010 section 7 failure to prevent offence, which was the intended model, and while evidence was considered of areas of conduct that would be proportionately and effectively captured by new criminal offences (beyond tax evasion). Since then, there have been successful prosecutions under section 7 of the Bribery Act 2010 for 'failure to prevent' bribery. In light of this, the Prime Minister has announced that the Government is to consult this summer on extending the 'failure to prevent model' to other economic crime offences. The Government's intention is to explore whether this model should be extended as a complement to existing legal and regulatory frameworks. The Government wants to hear views of civil society, members of the public, law enforcement agencies, and businesses on the law enforcement and corporate good governance benefits of these proposals and on any potential business impacts and risks. The consultation will be published in the summer.

The UK Law Enforcement Response to Corruption

Action 37: A new central bribery and corruption unit will be created within the NCA by bringing together resources from the NCA and the DfID-funded units

(by April 2015)

Complete

In June 2015, the International Corruption Unit (ICU) was established within the NCA. The ICU investigates:

- Bribery of foreign public officials by individuals or companies from the UK;
- Money laundering by corrupt foreign officials and their associates.

The ICU will also:

- Trace and recover the proceeds of international corruption;
- Support foreign law enforcement agencies with international anti-corruption investigations;
- Engage with government and business to reduce the UK's exposure to the proceeds of corruption;
- Work with business to support increased compliance with the Bribery Act 2010.

The ICU draws on the specialist support available to it within the NCA, and works closely with other UK law enforcement agencies and overseas partners.

In line with the UK Anti-Corruption Plan, the ICU replaces the MPS Proceeds of Corruption Unit and the City of London Police Overseas Anti-Corruption Unit.

Action 38: The NCA, working with other agencies, will implement a programme to improve the recruitment and retention of specialists to support corruption investigations

(by April 2015)

Complete

Seconded officers, from a number of agencies, have joined the International Corruption Unit (ICU) and the national multi-agency intelligence team established within the NCA, bringing their expertise and specialisms to both the new units. This includes: financial investigation; data analysis; and intelligence development. In addition, a recruitment drive is underway to directly employ staff with the necessary specialist skills to support corruption investigations. Work is also underway to create a specific career path for these specialists.

Action 39: Cabinet Office to take forward a review of the enforcement response to bribery and corruption more broadly, reporting to the Inter-Ministerial Group on Anti-Corruption (by June 2015)

Complete

The Cabinet Office-led review of the enforcement response to bribery and corruption has concluded and its recommendations are being considered by Ministers.

Action 40: New guidelines on sentencing in cases of fraud, bribery and money laundering to take effect (from October 2014)

Complete

From 1 October 2014, courts in England and Wales must follow the Sentencing Council's Fraud, Bribery and Money Laundering definitive guideline. The guideline covers the great variety of offences, such as tax evasion, identity fraud and insurance fraud. For the first time, money laundering and bribery will also be covered by the guideline. The guideline applies to the sentencing of individuals and organisations.

Recovering Stolen Assets and Tackling Illicit Financial Flows Linked to Corruption

Action 41: DfID to develop proposals for establishing an international rapid reaction team to deploy to countries where regime change has taken place, in order to provide expert assistance in mutual legal assistance and asset recovery (by June 2015)

Complete

The International *Rapid Reaction Team for Asset Recovery* proposal has been developed and is being considered for inclusion in the law enforcement outcomes of the International Anti-Corruption Summit in May 2016.

Action 42: HM Treasury and Home Office to complete the National Risk Assessment on Money Laundering and Terrorist Financing
(early 2015)

Complete

On 15 October 2015 the Government published the UK's first [National Risk Assessment \(NRA\) of money laundering and terrorist financing](#). It identifies and assesses the UK's money laundering and terrorist financing risks, drawing on data from UK law enforcement and intelligence agencies, anti-money laundering supervisors, government departments, industry bodies and private sector firms.

The NRA provides an improved understanding of the threat from money laundering and terrorist financing which will assist the Government, law enforcement agencies, supervisors and the private sector in targeting their resources at the areas of highest risk.

The NRA has found that while the UK's response to money laundering and terrorist financing risks is well developed, more could be done to strengthen the UK's anti-money laundering and counter-terrorist financing regime, including in the following areas:

- The understanding of certain types of money laundering, and particularly in relation to 'high-end' money laundering, where the proceeds are often held in bank accounts, real estate or other investments, rather than cash;
- The consistency of the UK's supervisory regime, and specifically the understanding and application of a risk-based approach to supervision;
- The priority given to combatting money laundering by law enforcement agencies and the effectiveness of their response.

Action 43: HM Treasury and Home Office to produce an Anti-Money Laundering Action Plan to address issues highlighted by the National Risk Assessment on Money Laundering and Terrorist Financing

(following publication of the National Risk Assessment)

Complete

The Action Plan was published on 21 April 2016 and represents the most significant change to our anti-money laundering and terrorist finance regime in over a decade.

The Action Plan has three priorities:

- Establish an enhanced law enforcement response, creating aggressive new legal powers and building new capabilities in our law enforcement agencies to enable the relentless disruption of criminals and terrorists
- Reform the supervisory regime to ensure that those few companies who facilitate or enable money laundering are brought to task

- Increase our international reach to tackle money laundering and terrorist financing threats by working with international groups, such as the G20 and Financial Action Task Force, to take action overseas.

Underpinning these priorities and central to the success of the Action Plan will be a new public-private partnership based on joint-working and sharing of information.

These changes will deliver the Government’s strategic aim to make the UK a more hostile place for those seeking to move, hide or use the proceeds of crime. It will result in greater disruption of money laundering and terrorist finance activities, the prosecution of those responsible and the recovery of proceeds of crime.

The Action Plan can be found on [GOV.UK website](#).

Action 44: HM Treasury to work with AML supervisors to assess their sectors’ vulnerability to corrupt PEPs and encourage a risk-based approach to supervision and compliance by firms. HM Treasury to report on progress including through the Annual Report on Anti-Money Laundering Supervision and the National Risk Assessment

(ongoing from December 2014)

Complete

HM Treasury engages on an ongoing basis with anti-money laundering (AML) supervisors through the Anti-Money Laundering Supervisors’ Forum, and has developed a voluntary reporting process for supervisors which is now in its fifth year. The Annual Supervision Report plays a key role in encouraging good practice and improving the transparency and accountability of supervision and enforcement in the UK. HM Treasury published the 2013-2014 Annual Supervision Report in March 2015 and preparations are now underway to produce the 2014-2015 Annual Supervision Report.

HM Treasury and the Home Office have worked closely together to draw up the UK’s first comprehensive National Risk Assessment (NRA) of money laundering and terrorist financing, which was published on 15 October. The NRA, which is the first of its kind in the UK, draws on data from UK law enforcement and intelligence agencies, AML supervisory agencies, government departments, industry bodies, and private sector firms. The NRA is the next step in ensuring that our AML and counter-financing of terrorism (CFT) regime is robust, proportionate and responsive to emerging threats. The NRA found that while the UK’s response to money laundering and terrorist financing risks is well developed, more could be done to strengthen the UK’s AML and CFT regime.

The Treasury and Home Office AML/CFT Action Plan addresses these issues and aims to ensure that the UK continues to lead the global fight against illicit financial flows. The Action Plan has set out how the Government will make AML supervision more effective, by further embedding a risk-based approach to supervision.

Action 45: Home Office to review the Suspicious Activity Reporting regime and to work with the reporting sectors to improve reporting to the National Crime Agency

(by July 2015)

Complete

The Home Office reviewed the Suspicious Activity Reports (SARs) regime through gathering the views of stakeholders via a Call for Information, which ran between February and March 2015. The stakeholder responses identified a number of areas in which they had concerns about the current SARs regime. To develop proposals for improving the regime, the Home Office, in partnership with the Royal United Services Institute, ran a number of workshops in October 2015 to gather further detail on stakeholders' needs.

The Home Office continues to work with stakeholders from across the reporting sector, regulators and law enforcement agencies on the detail of potential changes. Proposals for improving the SARs regime form part of the comprehensive Anti-Money Laundering Action Plan (Action 43).

Action 46: Home Office to seek to amend the Proceeds of Crime Act 2002 to enable the use of investigative powers after a confiscation order has been made to facilitate the tracing and recovery of hidden assets

(by March 2015)

Complete

The Serious Crime Act 2015 received Royal Assent on 3 March 2015. It amends the Proceeds of Crime Act 2002 to enable the use of financial investigation powers after a confiscation order has been made. This will enable the powers to be used to trace and recover hidden assets. These provisions were commenced on 1 March 2016.

Action 47: Home Office to seek to amend the Proceeds of Crime Act 2002, changing the legal test for a restraint order from one of 'reasonable grounds' to one of 'suspicion' in both domestic and international cases
(by March 2015)

Complete

The Serious Crime Act 2015 amended the legal test for restraint in the Proceeds of Crime Act 2002 from one of 'reasonable grounds' to one of 'suspicion'. The provisions were commenced on 1 June 2015 for domestic cases and on 30 November 2015 for international cases.

Action 48: NCA to increase its liaison with the financial sector to support businesses in reducing their exposure to money laundering and increase the capability of law enforcement to target money launderers
(by March 2015)

Complete

In February 2015 the Joint Money Laundering Intelligence Taskforce (JMLIT) was established as an NCA initiative, created in partnership with the financial sector to tackle high-end money laundering. Established as a one-year pilot, it has been developed with partners in government, the British Bankers Association, law enforcement and over 20 major national and international banks under the leadership of the 'Financial Sector Forum'.

The Taskforce will analyse information and expertise in the public and private sectors to better understand the true scale of money laundering and the methods used by criminals to exploit the UK's financial system. It will then agree actions that stop it.

The Taskforce is expected to deliver a wide range of benefits, including: a more informed prioritisation of risk by the banks; an improved collective understanding of new and emerging money laundering threats; targeted intervention activity by law enforcement; and greater opportunities to learn from partners' approaches.

Action 49: Home Office to consider further strengthening the financial investigation powers available to law enforcement
(by June 2015)

Complete

The Home Office has considered detailed proposals for changes to the Proceeds of Crime Act's financial investigation powers from operational partners and is working with them to develop a final set of measures to present to Ministers before a suitable legislative vehicle is identified.

Action 50: BIS to implement a central register of UK company beneficial ownership information as soon as practicable after the necessary primary and secondary legislation is in place
(subject to Parliamentary timetable)

On track

The Small Business, Enterprise and Employment Act received Royal Assent on 26 March 2015 and included provisions to introduce a new register of people with significant control (PSC register). The requirements for companies to collate and hold their PSC register came into force on 6 April 2016. Companies will be required to provide this information to a central register held at Companies House from June 2016.

Action 51: BIS to implement legislation to abolish bearer shares in the Small Business, Enterprise and Employment Bill
(subject to Parliamentary timetable)

Complete

The Small Business, Enterprise and Employment Act also included measures to abolish bearer shares. These measures automatically commenced on 26 May 2015, banning companies from issuing new bearer shares and commencing a 9 month timetable for existing bearer shareholders to surrender or convert their shares. This process will be completed by 26 February 2016. If a company still has bearer shares in existence at this date, they must apply to the court for them to be cancelled and pay the nominal value of the shares into the court. The holder of the shares can then apply to the court to receive the nominal value if they can show exceptional reasons why they could not be converted during the 9 month period.

Action 52: The Home Office will work with regulators and professional bodies to deliver targeted communications campaigns aimed at deterring professionals' involvement in serious and organised crime (whether wittingly or unwittingly) and encouraging the adoption of preventative behaviours

(from October 2014)

Complete

The Home Office, in partnership with the Solicitors Regulation Authority, Law Society and National Crime Agency has delivered targeted communications to approximately 130,000 members of the legal sector from October 2014 to February 2015. It resulted in a 20% increase in suspicious activity reporting from the legal sector.

The Home Office launched phase two of the campaign, working with the Accountancy Affinity Group to extend its reach to the accountancy as well as the legal sector. Phase two commenced in November 2015 running until March 2016 with the aim to measurably increase:

- Awareness of the money laundering threat;
- Understanding of the role professions can play in disrupting money laundering;
- Increase the adoption of preventative behaviours, which mitigate risk.

Action 53: The NCA will work with regulators and professional bodies to drive the small number of corrupt legal and financial professionals out of the system and provide effective support to the overwhelming majority who want to operate safely within the law

(from December 2014)

Complete

The NCA is working closely with regulators and professional bodies to ensure that the small number of corrupt legal and financial professionals, who enable criminal activity, are subject to disruption, including criminal justice investigations, regulatory action and civil recovery remedies. The NCA are currently investigating a number of allegedly corrupt legal and financial professionals with a view to securing criminal justice outcomes.

Action 54: Home Office to introduce a new offence of participating in the activities of an organised crime group (by March 2015)

Complete

The Serious Crime Act received Royal Assent on 3 March 2015 and a new offence of participating in the activities of an organised crime group came into force on 3 May 2015.

Leading the Fight against International Corruption

Action 55: DfID and FCO to continue to fund innovative projects on anti-corruption and transparency (during FY2014/2015)

Complete

In 2014, more than 40 projects focusing on anti-corruption and transparency were run using FCO Programme Funds, such as working with the authorities in Sao Paulo State (Brazil) to implement the State Transparency Programme, the development of a High Level Reporting Mechanism in Panama, and anti-bribery legislation capacity building in the Overseas Territories.

In 2015/16 the FCO is on track to continue to fund innovative projects. So far, funds worth around £4m have been committed, covering around 50 projects. Anti-Corruption and transparency projects will continue to be funded over the next 5 years from the Cross-Whitehall Prosperity Fund.

Action 56: DfID to review their country-specific anti-corruption strategies to take account of new and emerging threats to UK aid and opportunities for supporting national efforts to reduce corruption in partner countries (by December 2015)

Complete

DfID has completed a review of its anti-corruption country strategies and has updated them to reflect how tackling corruption is fundamental to poverty reduction overseas and to strengthening our national security in the UK.

Action 57: DfID to respond to the recommendations made by ICAI in its report on DfID's approach to anti-corruption
(by December 2014)

Complete

The DFID response was published in December 2014. The response is available on the [GOV.UK website](#).

Action 58: FCO and DfID will develop a toolkit of interventions to catalyse better HMG coordination to tackle international corruption cases and raise standards
(by March 2015)

Complete

A toolkit for HMG staff overseas was delivered in July 2015. The aim of the toolkit is to help government officials posted abroad to tackle corruption more effectively by providing useful information on how to counter corruption quickly and efficiently. For example, it puts in one place information about: UK Anti-Corruption policy and the UK Anti-Corruption Plan; anti-bribery and anti-money laundering legislation; links to external websites; speeches and statements on anti-corruption; and information about project work.

Action 59: Cabinet Office to coordinate the UK's international engagement on corruption so that the UK has a coherent approach and clear priorities for raising global anti-corruption standards, particularly through the G7, G20, OECD, GRECO, FATF and United Nations Working Groups on corruption and related issues
(ongoing from December 2014)

On track

The Cabinet Office has taken over responsibility for the UK's international engagement on corruption with the G7, G20 and OECD. The Cabinet Office also has responsibility along with FCO and DFID for UNCAC. Responsibility for GRECO will be transferred from the Ministry of Justice in 2016.

Action 60: Cabinet Office to coordinate the UK Government's responsibility for peer reviews, including those conducted by the OECD Working Group on Bribery, GRECO and UNCAC, with all relevant government departments supporting the Cabinet Office in responding to the recommendations made in evaluations

(ongoing from December 2014)

On track

The Cabinet Office has taken over responsibility for peer reviews in the OECD, and is working closely with FCO on UNCAC.

Action 61: MoJ and FCO to facilitate workshops focused on sharing the UK's experience of drafting and developing the UK Bribery Act in support of other countries as they seek to develop their own anti-bribery legislation

(during early 2015)

On track

Workshops with the Governments of Bermuda and Turks and Caicos Islands (TCI) were held in January 2015 and with Panama the following August. Pursuant to the workshop, officials are assisting both TCI and Panama in the preparation of draft bribery legislation using the Bribery Act model. Plans are underway for further projects in 2016. In addition, the Ministry of Justice has, in collaboration with the FCO, provided expert assistance in support of legislative proposals in Brazil, Peru and Mexico.

Action 62: FCO (i) to update the guidance and information provided to UK Diplomatic Missions overseas; and (ii) to consider how to enhance the training available to FCO staff overseas on dealing with bribery and corruption

((i) by December 2014 (ii) by March 2015)

**(i) Complete
(ii) Complete**

Specific guidance about the UK Bribery Act and obligations of staff to report allegations of corruption was issued in September 2014. Training is being delivered as part of the FCO's broader training programme. Training for staff is captured by the Economic and Prosperity Faculty of the 'Diplomatic Academy' offer. The Diplomatic Academy was launched on 1 April 2015. Further details can be found on the [GOV.UK website](#).

Action 63: FCO to work closely with those Overseas Territories with a financial services industry so that they can formally seek extension of the relevant Conventions

(by late 2016)

On track

The first UK Bribery Act Workshops with the Governments of Bermuda and Turks and Caicos Islands took place in January 2015. Over 70 delegates attended, including representatives from Anguilla, the Cayman Islands and Montserrat. Further details are available via the [GOV.UK website](#).

Action 64: The UK to produce its first EITI report

(by April 2016)

Complete

The first [UK EITI Report](#) was published on 15 April 2016.

The report includes an independent reconciliation of company payments against government receipts for extractive activities within the UK. In addition, information about the industry in the UK is published to help provide context to the data.

Implementing the Anti-Corruption Plan

Action 65: Cabinet Office to establish a new cross-departmental unit on international corruption, providing support to the Government Anti-Corruption Champion

(from December 2014)

Complete

The Joint Anti-Corruption Unit was established in early 2015, following publication of the UK Anti-Corruption Plan.

Action 66: Cabinet Office to arrange a regular forum for civil society and business leaders to engage with the Government on corruption and bribery issues

(by January 2015)

Complete

An initial meeting took place in January 2015 and a sector specific meeting was held on corruption in sport in February 2016. Since then we have been having regular and intensive discussions with both business and civil society as part of the preparation for the Prime Minister's Anti-Corruption Summit.

