



HM Government

# **UNITED KINGDOM ANTI-CORRUPTION STRATEGY 2017-2022 YEAR 3 UPDATE – 2020**





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# Introduction

In December 2017, we launched the first [UK Anti-Corruption Strategy 2017-2022](#) to provide a framework to guide government anti-corruption policies and actions. The Strategy aims to support national security, prosperity and trust in institutions.

This is the third 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. We published the [second year](#) in June 2020 which showed that we continued to make significant progress in implementing our Commitments in spite of challenges.

This Update solely provides details of activity undertaken in 2020 to implement the Strategy. It provides detailed descriptions of activity across the Priority areas of the Strategy throughout 2020 and focuses on a number of key areas: our multilateral work, our Prosperity Fund anti-corruption programme and our beneficial ownership campaign. Activity undertaken in 2021 will be provided in the Year 4 Update due in 2022 which will also address some of the challenges faced beyond the Strategy in this period.

# Strategic overview

2020 was a very difficult year globally, with unprecedented challenges for the UK in managing the global COVID-19 pandemic. This required a whole-government response to the pandemic focused on public health. This inevitably had an effect on anti-corruption matters both domestically and internationally. Despite the COVID-19 challenges, government has continued to drive implementation of its commitments in the Strategy. This Update contains a summary of the impact on the pandemic on implementation of the Strategy.

Beyond the pandemic there were a number of domestic and global events that affected the anti-corruption outlook:

- the UK leaving the European Union provided opportunities to review relevant regulations (most notably on procurement), and to support our businesses to enter new markets as we became an independent trading nation (see below)
- reductions to UK official development assistance (ODA) as a result of the COVID-19 related contraction of UK Gross National Income (GNI)
- the investigation of misconduct in public office and bribery with a significant connection to Liverpool City Council which led to the arrests of a number of individuals including the former Mayor of the city
- the incoming Biden Administration in the United States started to signal a renewed focus and commitment to tackling corruption by the US

Overall, we have made significant progress across a number of the Strategy Commitments. Activity in 2020 is set out in Annex B with further details in the Review of 2020. Highlights include:

- securing the public commitment with all Crown Dependencies and inhabited Overseas Territories to implement publicly accessible registers of company beneficial ownership information. This will help strengthen the international effort to counter illicit finance
- extending the remit of the National Fraud Initiative and helping local authorities to undertake bank account and active company checks
- reforming the police complaints and disciplinary systems to make them more transparent, independent and proportionate
- securing endorsement from G20 ministers of a G20 Call to Action for countries to combat corruption in the COVID-19 response and recovery
- publishing a review of procurement risks in local government that improves understanding and strengthens our response
- publishing the Green Paper on procurement reform with specific proposals to further strengthen transparency and integrity across government

# How are we doing?

Year 3 marked the half-way period of the Strategy and provides an opportunity to review overall progress against implementation:

Completed	On-going commitment or on-track commitment	Progressing with a risk that deadlines may be missed and/or some risk to delivery	Off track with deadlines expected to be missed and/or serious risk to delivery	Total
52	68	7	7	134

As we have moved into the latter half of the Strategy period, we will start to consider which of the remaining Commitments to prioritise and where we need to refocus efforts onto the significant challenges and trends that have emerged since the Strategy was introduced. We have evaluated which of the Commitments are no longer achievable or are no longer considered to be effective in achieving their overall goals, reprioritising focus and resources on those areas which will help achieve the overall objectives of the Strategy.

This Update provides more details and will highlight achievements which have gone beyond the original Strategy Commitments as well as an explanation for those few Commitments we have deprioritised.

## Impact of COVID-19

The COVID-19 pandemic had an unprecedented effect on a global scale that affected every part of government policy. As the pandemic continued into 2021, the full long-term effect on this on overall Strategy Commitments remains unclear, however, in the short term this Update identifies certain areas where planned activity was disrupted by the pandemic.

The emergency also stress-tested and shone a particular spotlight on the UK’s defences against corruption, in particular around public procurement and public sector integrity.

## Public procurement

Public bodies needed to procure contracts with extreme urgency to secure the vital supplies required to protect frontline NHS workers and the public. Procurement rules allow public bodies to procure at speed at times of extreme emergency, which we did where necessary, as did many other countries in their responses. However, even in times of extreme urgency it is still important to maintain the public’s trust and confidence in how we manage taxpayer’s money and so the [National Audit Office conducted a report into the government’s procurement during the pandemic](#) as part of a wider programme of work into the government’s response to the pandemic.

The NAO Report highlighted that the Cabinet Office issued information and guidance on public procurement regulations and responding to the pandemic. The [OECD commended](#) the guidance issued by the Cabinet Office as contributing in helping make sure that fair, transparent and equitable mechanisms continue to govern contractual relationships.

However, the NAO Report also found that the use of direct awards to procure goods, services and works may increase the chance of some procurement risks materialising if not correctly mitigated. It concluded that in some cases there was not always a clear audit trail to support key procurement decisions or how risks such as perceived or actual conflicts of interest have been identified or managed and that many contracts were not published in a timely manner. The pandemic experiences will provide a number of opportunities for lessons learned and we have committed to look carefully at the NAO recommendations.

The government's [Green Paper](#) on transforming public procurement, published on 15 December, also includes proposals to balance the need to procure quickly in times where measures are needed to protect life, with the need for appropriate safeguards and transparency. These proposals are designed to provide greater certainty for public bodies in these circumstances. The proposal is that there will be a requirement to publish a transparency notice whenever a decision is made to award a contract under this procedure. This would require public bodies to demonstrate clearly their justification for not undertaking a full competitive procurement procedure, in addition to publishing a contract award notice, which we plan to retain from the existing regulations. Development of these proposals is ongoing and government will continue to engage with stakeholders to provide updates.

We accept there are lessons to be learned in responding to this unprecedented global pandemic. In September 2020 the Cabinet Office commissioned a report to consider the government's communications procurement processes and the way in which some contracts were awarded during the early stages of the response to the pandemic, in order to learn lessons and improve our processes for the future.

## The Boardman Reviews

Between September 2020 and July 2021, Nigel Boardman was asked by the Cabinet Office to undertake three independent reviews into government procurement activity during the COVID-19 pandemic.

**Boardman 1:** Published on 8 December 2020, centred around two broad themes: the Cabinet Office's procurement processes and the way in which the government manages conflicts of interest. It produced 28 Recommendations for improvement which we accepted and are implementing in full. Additional guidance on procurement in an emergency and conflicts of interest has already been published.

**Boardman 2:** Published on 7 May 2021, covered similar themes to the first review, but expanded to cover five key parts of the government's response to the pandemic. This included: PPE, ventilators, vaccines, test and trace, and food parcels for the clinically extremely vulnerable. The review included 28 Recommendations for improvements to procurement processes across government.

**Boardman 3:** Published on 22 July 2021, the review considered the development and use of supply chain finance (and associated schemes) in government. Mr Boardman's recommendations were published in [September](#). Government is considering these and will set out a substantive government policy statement to Parliament in due course.

Commentary on the Boardman reports will be published in the Year 4 Update as action on the report outcomes were undertaken in 2021.

# Public sector integrity

The pandemic and issues that have emerged in 2021 have also stress tested the government's rules and approach to public sector integrity in a fast-moving environment where swift decisions and new structures have been necessary to respond to a crisis. While this progress report focuses on progress in calendar year 2020, given the importance of these issues it is also useful to briefly summarise the Government's approach and response in the current year (2021). These issues will be given fuller consideration in the Year 4 Update. Progress has, however, already been made in the current reporting period in several areas of public integrity policy.

Given the challenges of the last year, government has worked to maintain a full framework to ensure that public money is spent efficiently and that those who serve government as stewards of these public resources act in accordance with the highest ethical standards and in the public interest. There are checks and balances in place throughout a public office holder's time in office which ensure the high standards of propriety expected are understood and upheld. Transparency data and the public policy making process help to provide sufficient assurances that policy making is undertaken in the public interest.

Key to maintaining public confidence is being transparent on who is seeking to influence those holding senior roles in government and where their engagement is directed. Our system also upholds a range of integrity standards, including the [Seven Principles of Public Life](#), the [Ministerial Code](#), the [Code of Conduct for Special Advisers](#), the [Civil Service Code](#) and [Business Appointment Rules](#), which ensure that public servants put public service first. The [Governance Code on Public Appointments](#) sets out the principles and process for public appointments made by ministers which are regulated by the independent [Commissioner for Public Appointments](#). The government's [Code of Conduct for Board Members of Public Bodies](#) sets out, clearly and openly, the standards expected of office holders appointed by ministers.

Maintaining trust in our institutions means that the public should be in no doubt that the government takes its commitment to high ethical standards very seriously and we are already taking action in this regard:

- working with the [Advisory Committee on Business Appointments \(ACOBA\)](#) to improve the operation and efficacy of the Business Appointment Rules. We will consider and implement improvements to the scope and clarity of the rules, including the enforcement of the Rules, with an update to the rules later this year. We are also working closely with departments to improve the consistency and proportionality of the implementation of the rules, including improving training on and communication of the rules
- undertaking post-legislative scrutiny of Part 1 of the [Transparency of Lobbying, Non-Party Campaigning and Trade Union Administration Act 2014](#), to review the scope and effectiveness of the legislation in increasing transparency of consultant lobbying through the creation of the Register of Consultant Lobbyists



- reviewing and revising the **terms of reference for the Independent Adviser on Ministers' Interests**. This includes considering recommendations from the Committee on Standards in Public Life's review of the Independent Adviser role. The Adviser will now have the explicit authority to advise the Prime Minister on the initiation of investigations, and the updated terms of reference includes a commitment that the Adviser's conclusions will be published in a timely manner. The Adviser will also provide confidential recommendations to the Prime Minister about the appropriate sanction in the circumstances where it is determined that a Minister has failed to adhere to the standards set out in the Ministerial Code
- implementing a new policy in relation to the management of Special Advisers' interests, strengthening central oversight of potential risks. The Model Contract for Special Advisers now includes a cross-government policy for declaration of interests, including making a declaration mandatory. Departments will publish Special Advisers' relevant interests judged necessary by the Permanent Secretary in the departmental report

In addition to these measures, the government is openly engaging with multiple external review processes:

- the independent **Committee on Standards in Public Life Standards Matter 2** landscape review of the institutions, processes and structures in place to support high standards of conduct in public life
- the Boardman **review** into the development and use of supply chain finance (and associated schemes) in government. Mr Boardman's findings were published in July 2021, while his recommendations and wider suggestions were published in September. Government is considering these and will set out a substantive government policy statement to Parliament in due course
- the peer evaluation process of the **Council of Europe Group of States against Corruption (GRECO)**, in which the UK was the first country to undergo the 5th evaluation round on prevention of corruption in the highest levels of government
- membership of the Organisation for Economic Co-Operation and Development (OECD) Working Party of Senior Public Integrity Officials

The dialogue which such processes generate internally is an important part of our ongoing policy development, and we will continue to consider relevant findings and recommendations and take further action to strengthen our systems where appropriate.

## Leaving the European Union

The UK leaving the European Union in January 2020 provided new opportunities to address corruption and, in some ways, changed the nature of the threat.

On becoming an independent trading nation, we encourage our businesses to look to new markets and export to areas beyond their traditional customer base. This is being supported by the negotiation of new trading arrangements with partner countries which provide an opportunity to raise global standards and consider how to ensure that our businesses can compete fairly in new markets not tainted by bribery and corruption.

Leaving the European Union also allows us to develop autonomous legal regimes which provide new opportunities to address corruption. This includes the opportunity to develop a new international corruption sanctions regime (to be reported in the Year 4 Update) and a new procurement framework which is addressed by the Green Paper (see Priority 4 of the 2020 Review).

The full impact of leaving the UK on the fight against corruption will take many years to realise and will be further examined in future Updates.

## Measuring the impact of the Strategy

In the Year 2 Update we introduced a new section looking at how the UK's standing on corruption has changed throughout the Strategy period. While necessarily imperfect, these indicators give a broad indication of how the UK is performing on anti-corruption indices. As we observed last year, this is not an easy task. Corruption is a broad topic, covering multiple areas and factors where measuring against statistics is challenging.

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, and the UK continued to perform well against comparable western countries.

The analysis for Year 3 is set out in full in Annex A.

# Review of 2020

## Review 1: Reduce the insider threat in high-risk domestic sectors

The main focus of 2020 was to assess and understand the impact that the UK's departure from the European Union and the pandemic might have on the nature of the insider threat, especially at the border. On Strategy Commitments there was significant progress in policing, while much groundwork for future progress was made for prisons, probation and defence.

As large numbers of workers at ports and airports lost jobs or were furloughed because of COVID-19, there is an increased risk that financial and other pressures may make these workers more vulnerable to exploitation by organised criminal gangs or terrorist organisations. The Home Office, with the Department for Transport and operational partners, oversaw measures to address this risk, including delivery of a new data sharing capability in the aviation sector, to improve checks on those with privileged access at UK airports, and a suite of communications packages and guidance for the aviation, maritime and international rail sectors on how to manage workers returning to work following COVID-19.

In February 2020, we implemented the provisions of Part 2 of the Policing and Crime Act 2017 (Commitment 1.3(a)) to overhaul the police complaints and disciplinary systems, to make them more transparent, independent and proportionate (the 'February 2020 Reforms'). The reforms were significant and included:

- introduction of a structured process to deal with lower-level conduct and performance (the 'Reflective Practice Review Process'), focussing on learning and improvement and moving away from blame and punishment
- an increase to the threshold for misconduct, meaning that only serious breaches of the Standards of Professional Behaviour are subject to investigation or disciplinary proceedings
- simplification of the complaints system, with a greater emphasis on handling complaints in a reasonable and proportionate matter, together with a wider definition of what constitutes a complaint, ensuring that complaints can be made about organisational as well as individual failings
- increased powers to the Independent Office for Police Conduct (IOPC), including the 'power of initiative', ensuring that it can investigate matters without needing referral from forces
- provisions to improve timeliness of complaints and internal misconduct allegations, including an obligation on forces and the IOPC to set out rationale in writing where cases take longer than 12 months
- measures to improve transparency of the system, including routine disclosure of terms of reference and investigation reports to officers

These February 2020 Reforms have in effect strengthened arrangements for whistleblowers helping to underpin Commitment 1.5. Part of these reforms include new powers for the IOPC, including the power of initiative to investigate matters without having to wait for a police force or other appropriate authority to refer a matter to it. However, given the wider February 2020 Reforms, we need to assess whether the remaining whistleblowing provisions from the 2017 Act are still relevant and, therefore, certain provisions from the Act remain unimplemented.

The February 2020 Reforms also gave the IOPC new powers to reopen closed investigations where compelling new evidence comes to light and to present cases that it has investigated at police disciplinary hearings. Processes have been reformed to streamline decision-making, improve timeliness and to create greater independence in the modes of investigation. There are also new requirements on the IOPC to investigate all conduct matters involving chief officers (Commitment 1.7(b)).

The reforms introduced since the start of the Strategy period have had an immediate impact on speed of investigations, with over 90% of IOPC cases since 2018 being concluded within 12 months of being opened and we hope to see further improvements as the effect of the changes are felt.

In December, the [Law Commission](#) published its report on [Misconduct in Public Office](#) (Commitment 1.11). This report recommends that two new statutory offences should replace the current common law offence of misconduct in public office, with an offence of corruption in public office and an offence of breach of duty of public office. We are considering this report and its recommendations carefully and will aim to issue the government's response, together with confirmation of any next steps, within the timeframes outlined in the Joint Protocol between the Law Commission and the government.

## Review 2: The UK as an international finance centre

We recognise that the UK as a leading international finance centre is vulnerable to corruption and illicit finance, and throughout 2020 we have continued work to manage this risk. Much of our work in this area is centred around delivery of the [Economic Crime Plan in 2019](#).<sup>1</sup> In May 2021 we published [updated progress](#) on the strong progress that took place against the Economic Crime Plan in 2020.

We have made progress in promoting beneficial ownership registers with our Overseas Territories (OTs) and Crown Dependencies (CDs) (Commitment 2.3 and 2.4). All CDs and inhabited OTs have committed to publicly accessible registers of company beneficial ownership information, and the three OTs that had not previously made public announcements did so in 2020. In December, we published the draft [Order in Council](#) that we were required to prepare under the [Sanctions and Anti-Money Laundering Act 2018](#). This sets out the minimum requirements of what the government deems to be compliant publicly accessible registers in the OTs. We commissioned [Open Ownership](#) to provide the OTs with individualised assistance to support their implementation of registers and funded the development of Anguilla's beneficial ownership register. All three CDs and the six OTs with financial centres who are part of the Exchange of Notes arrangements and our law enforcement agencies continue to report that the arrangements are a useful tool in progressing complex criminal investigations.

The [draft bill](#) on establishing the public register of beneficial ownership of overseas legal entities that own UK property, has been published (Commitment 2.2) and we will legislate when parliamentary time allows. In December 2020 we launched a consultation on proposed changes to public procurement in the [Green Paper on Transforming Public Procurement](#). The Green Paper is discussed in more detail in the review of Priority 4.

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<sup>1</sup> In April 2021 we released a [Statement of Progress](#) on the Economic Crime Plan which will be reported on in more detail in the Year 4 Update.

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With regard to the implementation of international standards (Commitment 2.5) we are co-leading the FATF assessment on **Recommendation 24** on transparency and beneficial ownership of legal persons. We provide voluntary contributions to cover, amongst other things, FATF staff costs, secretariat and preparation for mutual evaluation reports (and provided assessors for the reports of St Lucia, the UAE and the Republic of Korea). We have also supported anti-money laundering and counter terrorism financing systems through the **Caribbean FATF (CFATF)** for developing countries in the Caribbean and the **Eastern and Southern Africa Anti-Money Laundering Group (ESAAMLG)** which supports Eastern and Southern African systems. All funds are in line with **Official Development Assistance** policy. We also support countries' implementation of AML and CFT standards through our Technical Assistance Unit.

In Years 1 and 2, the **National Economic Crime Centre (NECC)** and the National Data Exploitation Capability (NDEC) were established, housed in the **National Crime Agency (NCA)**. These new capabilities represent a significant investment by the government to deliver a step change in tackling serious and organised economic crime. The NECC is a multi-agency centre to bring together law enforcement agencies, government departments, regulatory bodies and the private sector with the goal of driving down serious and organised economic crime. The National Data Exploitation Capability (NDEC) is a multidisciplinary team including data scientists, intelligence officers and analysts working to enhance the capabilities of the NCA and wider UK law enforcement. By partnering with other agencies, combining new data sources and using advanced data science, NDEC exploits data to detect and disrupt serious and organised crime (SOC). As well as automating data matching/searching for Law Enforcement, NDEC is positioned to enhance existing capabilities and where needed will develop bespoke solutions to combat the evolving SOC threat. NDEC looks to bring the power of data science, big data and strong data analytical skills to the everyday work undertaken by investigators and intelligence officers.

As a result of the recent establishment of the NECC and NDEC, our ability to investigate money laundering and other economic crime by gathering data, developing intelligence and conducting analysis (Commitment 2.12) has been significantly enhanced. The functions of the Joint Financial Analysis Centre (JFAC), including the analysis of large data sets and the co-ordination of the response, have been taken on by the NDEC and the NECC respectively. The NDEC and NECC are now embedded as part of the UK's response to the threat to the UK from serious and organised economic crime.

In 2020, two of the four investigations where unexplained wealth orders (UWOs) were previously obtained were completed. During the year we saw the UK's first successful recovery of the proceeds of crime following an UWO (introduced under the **Criminal Finances Act 2017**) (Commitment 2.9). The NCA secured an UWO in relation to eight properties belonging to a Leeds businessman with links to serious and organised crime. As a result of analysing information provided by the respondent, the NCA was able to recover assets worth nearly £10 million. This milestone case was the first UWO obtained solely on an individual's alleged involvement in serious organised crime.

Another important tool introduced by the Criminal Finances Act was Account Freezing Orders (AFOs). In 2020 Law Enforcement (LE) obtained a total of 1,154 Account Freezing Orders with a value of £136.5 million, as well as 109 Listed Asset Orders with an estimated value of £3.2 million.

We published our [response](#) to the Call for Evidence on Corporate Criminal Liability for Economic Crime in November 2020 (Commitment 2.14). This is a complex area of the law which attracts diverse and often strongly opposing views. The responses submitted to the public Call for Evidence proved inconclusive with no new evidence submitted or a convincing majority on a preferred way ahead.

We were therefore not persuaded that sufficient evidence had been provided to support immediate legislative changes and have [commissioned the Law Commission](#) to undertake an in-depth review of the current law and, if appropriate, provide options for reform and next steps. The work is underway and the Commission estimates that this review will take between 12-15 months to complete.

This, together with an evaluation of our recent measures to strengthen our response to economic crime such as through the Criminal Finances Act 2017, will inform any future decision on reform to our legal regime for corporate liability.

We continue to make good progress on the Suspicious Activity Reports (SARs) Reform Programme (Commitment 2.24). This Programme has delivered a number of improvements, including:

- creating an interface through which to test the new process for large organisations to report SARs
- securing additional staff in the UK Financial Intelligence Unit (UKFIU) and Regional Organised Crime Units, and increased feedback and engagement between the UKFIU and reporters of SARs
- improving the efficiency of Defence Against Money Laundering reporting
- introducing [guidance](#) on how to complete a SAR
- a Benefits Realisation Model which shows how the changes being made through the programme will have a real world impact

## **Review 3: Promote integrity across the public and private sector**

As many of the Commitments in Priority 3 of the Strategy had been completed in Years 1 and 2, this year has seen modest progress on the remaining Commitments. Ten of the 18 Commitments have been completed and we have continued to build on their progress, especially with the Counter Fraud Profession. There has, however, been more limited progress on reviewing our whistleblowing framework and reform of the limited partnership law.

Over the last year membership of the Counter Fraud Profession continued to grow, with around 7,000 members who have now joined from 33 organisations in the Investigations, Intelligence and Fraud Risk Assessment disciplines (Commitment 3.1). This includes the first members from Police (City of London Police and the Eastern Region Special Operations Unit). Further professional standards have been developed, with Fraud Measurement and Assurance standards agreed and new Data and Analytics standards being piloted and a new platform enabling cross-organisational collaboration has been developed. The first cohort of apprentices have commenced their Counter Fraud Investigator Apprenticeships, developed in partnership with HMRC.

In Commitments 3.9 and 3.10 we committed to review the effectiveness of the Whistleblowing Guidance for Employers and Code of Practice and the changes introduced by the Enterprise and Regulator Reform Act 2013.

On Commitment 3.9, this guidance and code of practice was published by BEIS in 2015 and aims to ensure that employers are aware of their responsibilities in relation to whistleblowing and follow good practice when responding to disclosures. As we reported in Year 1, we held the intended review of the effectiveness of the Whistleblowing Guidance and Code of Practice, but this was inconclusive due to a limited response rate from employers.

On Commitment 3.10, preparations for a review of the wider whistleblowing landscape has begun, but pace has been slower due to resources being prioritised for the pandemic response. Ahead of deciding on the precise scope of the review, we would also want to consider wider sources of evidence and good practice regarding whistleblowing which have been generated in the period since we made these Commitments.

In November 2020 the Steering Committee of IPACS met and agreed governance guidelines (Commitment 3.18). In accordance with the Guidelines, the Chair, Vice-Chair and members of the Bureau were elected, with the UK confirmed as a Bureau member. The Committee was updated on the ongoing work of the four task groups which includes the development of a vulnerability assessment tool, guidelines for the reallocation process of sports events, good practice examples on conflicts of interest for sport organisations and a stocktake of existing anti-bribery legislation.

## **Review 4: Reduce corruption in public procurement and grants**

Public procurement is susceptible to corruption due to the large sums of money involved and the large volume of contracts. Leaving the European Union presents a unique opportunity to reform public procurement beyond the existing Commitments in the Anti-Corruption Strategy. The Green Paper '[Transforming Public Procurement](#)', published in December 2020, included a range of proposals which support the aims of the Anti-Corruption Strategy.

To prevent procurement corruption, the reforms to the procurement regime will be based on transparency, competition and objective criteria in decision-making. Specific proposals to improve transparency throughout the commercial lifecycle – from planning through to procurement, contract award, performance and completion – include:

- extending the scope of publication requirements to include planning and performance, in addition to the current requirements to publish contract opportunities and contract awards
- requiring all contracting authorities to implement the Open Contracting Data Standard
- establishing a single digital platform for supplier registration that ensures businesses only have to submit their data once to qualify for any public sector procurement
- mandating the publication of a transparency notice whenever a decision is made to award a contract where a full procurement procedure is not used

In addition, we propose using the exclusion rules to tackle unacceptable behaviour in public procurement and exploring the introduction of a centrally managed debarment list. Having a centralised debarment list could have a significant impact on the management of unsuitable suppliers by bringing consistency and a strategic view to the way exclusions are managed.<sup>2</sup>

In June 2020 MHCLG **published a review** into the risks of fraud and corruption in local government procurement (Commitment 4.1). Councils collectively spend £55 billion a year on procurement, spending which is vulnerable to abuse by criminals, fraudsters and the corrupt. The Review set out practical examples, case studies and a risk tool – drawn from local authorities’ own experiences – showcasing how councils can strengthen their processes and implement prevention measures

The remit of the **National Fraud Initiative** was extended so that we can choose to match data from grants and payments from local authorities (Commitment 4.11). In addition, we launched new products working with partners to allow local authorities to undertake bank account and active company checks. To encourage local authorities to make better use of the NFI services, we published newsletters and held workshops and virtual visits and delivered a pilot on business support grants which has led to the roll out of a mandatory data match targeting business support grant fraud. In July we issued the **National Fraud Initiative Report** which identified almost £2 billion of fraudulent benefits claims and overpayments.

The NHS Counter Fraud Authority (NHSCFA) has assessed that, in the context of a 2019 to 2020 NHS budget in England of almost £140 billion, fraud, bribery and corruption against the NHS costs the public purse an estimated £1.21 billion. In 2019/20, it successfully delivered against its first financial target of £127 million and refreshed its **counter fraud strategy** for 2020-23 (Commitment 4.15) to meet the challenge. The new strategy has a vision to provide a system-wide approach to tackling fraud which protects taxpayer’s money for better patient care commitments to a £400 million fraud detected, prevented and recovered target. A Statutory Instrument (via an Order in Council) was introduced in Parliament in 2020 which will allow the NHSCFA to be investigated, by the Parliamentary and Health Service Ombudsman, where a complaint about them has been made.<sup>3</sup>

The CMA’s tool to analyse bidding data has been withdrawn for the time being while it is reviewed and updated (Commitment 4.8). This was due to the issues with the tool mentioned in the Year 2 Update being insurmountable at this stage. However, despite delays caused by prioritising work on the CMA’s COVID Taskforce, we have restarted analytical work to test and develop new approaches to data-driven cartel detection. We are working with competition authorities across Europe and through our Multilateral Mutual Assistance and Cooperation (MMAC) framework which includes the US, Canada, Australia and New Zealand.

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2 There were over 600 responses to the Green Paper, from a range of organisations including those concerned with transparency and corruption. More details will be provided in the Year 4 Update

3 This Order in Council came into force on 1 February 2021 and will be reported on more fully in the Year 4 Update.



## Review 5: Improve the business environment globally

We are committed to raising global standards in an international rules-based system to help create a level playing field for our businesses to compete globally and to ensure that other trading nations do not seek a competitive advantage by having less effective anti-corruption legislative and regulatory frameworks or not effectively enforcing their laws. This is especially important as we look to grow the economy after the pandemic challenges and as our businesses look to access new markets now that we have left the European Union. This will require a strong multilateral effort as well as exploring how we can use our new trading agreements to raise international standards.

The [OECD Anti-Bribery Convention](#) remains a critical part of this. We have been active members in the [OECD Working Group on Bribery](#) in the negotiations to revise the 2009 Recommendation to the Convention aiming to help use the process to boost implementation of the Convention. We have also been engaging with Saudi Arabia on its 'becoming a participant member' of the Working Group in December 2020, which triggered a two-year process where it will work towards full accession to the Convention. We were also co-lead examiners of the United States in its Phase 4 [monitoring report](#) (Commitment 5.1).

The UK supported the first ever G20 Anti-Corruption Ministerial meeting in October 2020 where the UK was represented by the Minister of State for Security James Brokenshire MP. The Ministerial Communique contains the G20's strongest ever language on issues such as criminalisation of foreign bribery (Commitment 5.2). The UK pushed successfully for a COVID-19 Call to Action which acknowledges that the speed and scale of economic support provided by governments in response to the pandemic may increase the risk of corruption and contains a strong set of commitments to ensure transparency and integrity in COVID-19 response programmes. We also supported the delivery of COVID-19 good practices and high-level principles on integrity through technologies, national strategies and integrity in privatisation and public-private partnerships.

The Prosperity Fund Global Anti-Corruption Programme (GACP) worked in 2020 with its delivery partner UN Office of Drugs and Crime (UNODC) to provide technical assistance and capacity building in southeast Asia, Africa and Latin America. They worked to incentivise countries in these regions to undertake results-focused activities to fast track the implementation of UNCAC in support of the Agenda 2030 and Sustainable Development Goal 16 (SDG 16) (Commitment 5.4). The activities strengthened the capacity of anti-corruption practitioners, civil society, the private sector and other stakeholders to prevent and combat corruption. This included a series of webinars and workshops focusing on anti-corruption in public procurement, in-country capacity building and development of new frameworks on whistleblower protection which continue to be delivered across the regional platforms.

The UK has also supported the International Anti-Corruption Coordination Centre (IACCC). The IACCC, brings together specialist law enforcement officers from multiple agencies around the world to tackle allegations of grand corruption. Over their last reporting year (August 2019 – July 2020), the IACCC froze £65 million of assets, served a criminal summons on a financial institution that resulted in a \$3.9 billion settlement, and contributed to efforts to prosecute a former head of state.

The Government Digital Service (GDS) Global Digital Marketplace Programme continued to deliver projects across five countries (Colombia, Malaysia, Mexico, South Africa and Indonesia) as well as a number of non-country specific activities. For example, in 2020 GDS worked on two main projects in Indonesia focusing on e-procurement reform (Commitment 5.18) which included:

- simplifying procurement documents to make the tender process more accessible for buyers and suppliers
- working with **Open Ownership** to show where beneficial ownership data can be collected from existing government sources and how it might be used in public procurement systems to ensure that public money does not find its way to corrupt company owners

Following the pandemic, programmes were encouraged to pivot delivery to respond as directly as possible to the crisis. The GACP worked with its partners to design the Transforming Procurement Systems project. Three country pilots supported the short-term emergency response through procurement reform, digital transformation and beneficial ownership transparency leading to longer term stabilisation and recovery. In Mexico for example, the project capitalised on the considerable shift in political will arising from the COVID-19 risks increasing the ambition of reforms under the UNCAC project: use of transparent systems, improved detection and reporting of corruption in emergency and health sector procurement, and strengthened policies, laws and regulations that are more ambitious than before the pandemic. This **case study** highlights the wider work of the GDS in 2020, in support of the UK Anti-Corruption Strategy.

We will report on the impact of the announcement to cut overseas development assistance to 0.5% of gross national income in the Year 4 Report.

**CDC**, the UK's development finance institution, now publishes **impact dashboards** for new investment commitments (Commitment 5.6) as part of its commitment to the new **Operating Principles for Impact Measurement**. The Principles bring greater discipline and transparency to the impact investing market, requiring annual disclosure statements and independent verification of signatories' impact management systems and processes. The signatories to the principles are a diverse group of impact investors, comprised of asset managers, asset owners, Multilateral Development Banks and Development Finance Institutions.

We **published our approach to the principles** in July 2020 and they were **independently assessed** and judged CDC to have 'advanced' alignment with the majority of the Principles.

To ensure CDC's own investments are underpinned by world-class due diligence and business integrity practice (Commitment 5.7), in 2020 CDC approved a new risk appetite and guardrails in respect of bribery and corruption and other integrity risks. It appointed a new Head of Business Integrity growing the team to 17 and worked to embed its risk appetite and risk assessment methodology in its internal processes and controls. It also developed a revised risk rating tool to ensure consistency of approach and analysis of integrity risks.

Over the course of 2020, the Business Integrity Initiative (BII) has piloted 14 interventions to improve business integrity support provided by HMG, both in the UK – via the Business Integrity Hub – and in three pilot countries (Kenya, Pakistan and Mexico) (Commitments 5.11). The BII has directly supported more than 250 businesses with products and services highly rated by users in terms of quality and relevance to businesses.

## Review 6: Work with other countries to combat corruption

We have continued to contribute to funding the Open Budget Initiative led by the **International Budget Partnership (IBP)** (Commitment 6.3). In recognition of the additional risks related to the extensive emergency COVID-19 spending, IBP conducted a one-off 'COVID-19 expenditure' review covering 120 countries and focusing on the degree of budget transparency during the pandemic. The **report findings**, build on the IBPs biennial 'Open Budget Survey' which covers 117 countries and is recognised globally as the primary gauge of fiscal transparency.

We have also funded the Open Contracting Partnership (OCP) which continued to make good progress in supporting countries to implement more open contracting in public procurement, even in the face of the COVID-19 pandemic. The OCDS Helpdesk (OCP's technical support service) continued to respond to requests from countries around the world, supporting 63 different countries to implement more open contracting in 2020, far surpassing the 16 countries we committed to in Commitment 6.5.

Achievements from the UK support to beneficial ownership registers and transparency through Open Ownership (OO), Commitment 6.6 include:

- entries in the register increased to more than six million companies and 12 million entries
- OO was engaged in 35 countries, including 14 British Overseas Territories to increase company transparency and focusing on implementing high quality data standards
- Commitment 6.14. We supported Transparency International UK's Defence and Security Programme whose research project, the Government Defence Anti-Corruption Index (GDI), completed 37 country assessments by the end of 2020. These assessments review the quality of institutional controls to manage the risk of corruption in defence and security institutions to ensure governments are better able to identify and mitigate corruption risks.

## How we deliver the vision

We are expanding and improving the evidence base on corruption (Commitments 7.1 and 8.6) by commissioning a number of reports, including a business survey on economic crime and a number of deep dives looking at the impact of corruption in certain sectors and locations. This is all part of a new internal evidence strategy which is designed to frame our evidence-based learning which support future policy development.

We are continuing to be active members and participants in our multilateral institutions (Commitments 8.5, 9.1, 9.2 and 9.5) and have retained our **rating** by Transparency International as one of only four (out of 44) 'active enforcers' of the OECD Anti-Bribery Convention. In November we published the **Country Review Report** on our implementation of the relevant elements of the United Nations Convention Against Corruption (UNCAC) which highlights the good progress made so far and makes recommendations for further improvement which we are acting on. The UK government has also extended ratification of UNCAC to the Cayman Islands who joined the Crown Dependencies, Bermuda and the British Virgin Islands in being covered by the Convention.

Due to challenges of the global pandemic and the necessary reduction in 2020 UK Official Development Assistance in line with UK GNI, we have had to discontinue our 'Mobilising data for anti-corruption' programme (Commitment 7.6). We will actively pursue other means of strengthening collaboration between law enforcement, the private sector, civil society and the media to improve the quality and use of data to identify and investigate potential corruption cases.

## 2021 Outlook

The focus in 2021 is on implementing the remaining Commitments and continuing to manage the impact of the pandemic including those areas stress tested by the response to the global emergency. We are also mitigating the impact of the reduction in ODA spending on the Commitments and overall approach to combatting corruption.

2021 also provides significant opportunities for progress in the multilateral institutions, with the UK holding the G7 Presidency and the UN General Assembly Special Session on Corruption. The UK has also reported back on progress made since the most recent peer reviews in the OECD Working Group on Bribery and the Group of States Against Corruption (GRECO).

The UK is using its G7 Presidency to harness collective action by like-minded open societies in support of democratic values. This includes tackling the threats to democracy posed by corruption and illicit finance. The [Integrated Review](#) Security, Defence, Development and Foreign Policy commits to using our Presidency to drive action on corporate transparency and asset recovery.

We are carefully considering Mr Boardman's recommendations, along with a number of other relevant reports, and will set out a substantive government policy statement to Parliament in due course.

Details of all 2021 activity will be contained in the Year 4 Update due in early 2022.



# **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 and dealt with internally by organisations without recourse to engage with the criminal justice system. Corruption is also multi-faceted, and data is often not directly collected, rather proxy measures for dimensions of corruption are collected and used instead.

In the [Year 2 Update](#) of the Anti-Corruption Strategy 2017-2022, we introduced a new section comparing the UK's position in various external indicators of corruption. These indicators were selected in collaboration with the independent [U4 Anti-Corruption Helpdesk](#) and other partners and were chosen to indicate the strategic direction and progress of the UK in reducing corruption. In addition, we have selectively included trends and country comparison using charts to demonstrate change over time comparing the top five global economies for selected indicators. This helps to provide a global perspective.

## How is the UK doing?

The UK continues to measure up well against our G7 partners in many areas, particularly regarding trends seen in open data, perceived prevalence of corruption in our systems and trust in institutions. Analysis of the indicators demonstrated that the UK's standing has remained relatively steady over the first two years of the Strategy, continuing from the stable trends seen before the Strategy was implemented. This year's analysis (year 3) reveals that the trend is stable again. In the global context where tackling corruption is facing unprecedented challenges, holding steady is not a disaster, but is at the lower end of the UK's ambition to be a global leader in tackling corruption. While it is also recognised that the full effects of the global pandemic on the UK's standings will not be reflected in the data for a number of years, holding steady may indicate that the fundamentals of our structures and systems are strong and able to withstand many of the current challenges. The ambition outlined in the Forward Look in this Update is designed to build upon these fundamentals.

## Is the Strategy working?

This analysis is not an attempt to establish direct causality between delivery of the Strategy and results of these indices. There is no one indicator which directly measures the impact of the Strategy and many of these indicators measure factors which are not the direct focus of the Strategy. Where Strategy work would be directly relevant to influence the indicators, in some instances this might be some time before this is known.

Note: throughout the document, particularly in the trend column of the tables, the change from this year to last can look drastic. It is important to note that this is not necessarily reflective of a large change in the corruption indicator. For example, when smaller samples are used, very small changes can equate to large percentage differences (which get displayed in the trend column). These should be considered with caution, and the narrative should be read which includes an appropriate interpretation of each source.

To conclude, while we feel this exercise is worthwhile 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, we urge caution in forming too many overall conclusions on the impact of the Strategy.

## Indicators of corruption

The corruption indicators have been divided into five baskets reflecting five different themes of measurement:

- Regulation and transparency that reduces corruption.
- The corruption threat to UK national security.
- An increase in prosperity at home and abroad.
- Public confidence in the UK's domestic and international institutions.
- Expert opinion of corruption.

These 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.
- 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.

In addition, to provide a global perspective, we have selectively included trends and country comparison using charts to demonstrate change over time comparing the other G7 nations for selected indicators. These figures include those published for 2020 only.

This document is published annually, and the sources included are reevaluated at each iteration. All existing sources have been updated where possible, and any new sources introduced in this year's publication have been highlighted with a footnote.



# Basket 1: Measuring regulation and transparency that reduces corruption

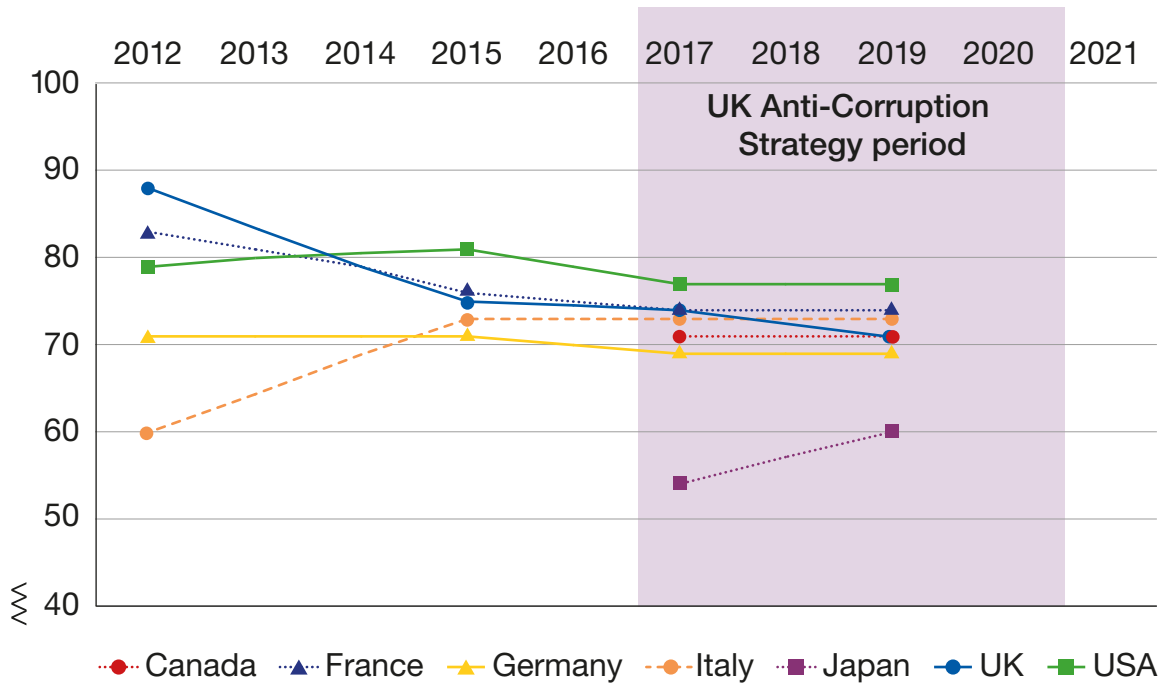
Transparency, open data and budget accessibility and stakeholder engagement in the policymaking process are important safeguards known to reduce the risk of corruption. These indicators provide some insight into the strength of regulation and willingness to be open with data and budgets within the UK.

The indicators within this basket have not been updated to reflect 2020 data, since they are not released annually. They have been retained in this iteration for ease of comparison with the next release, which is expected to be updated, and to inform the latest available statistics.

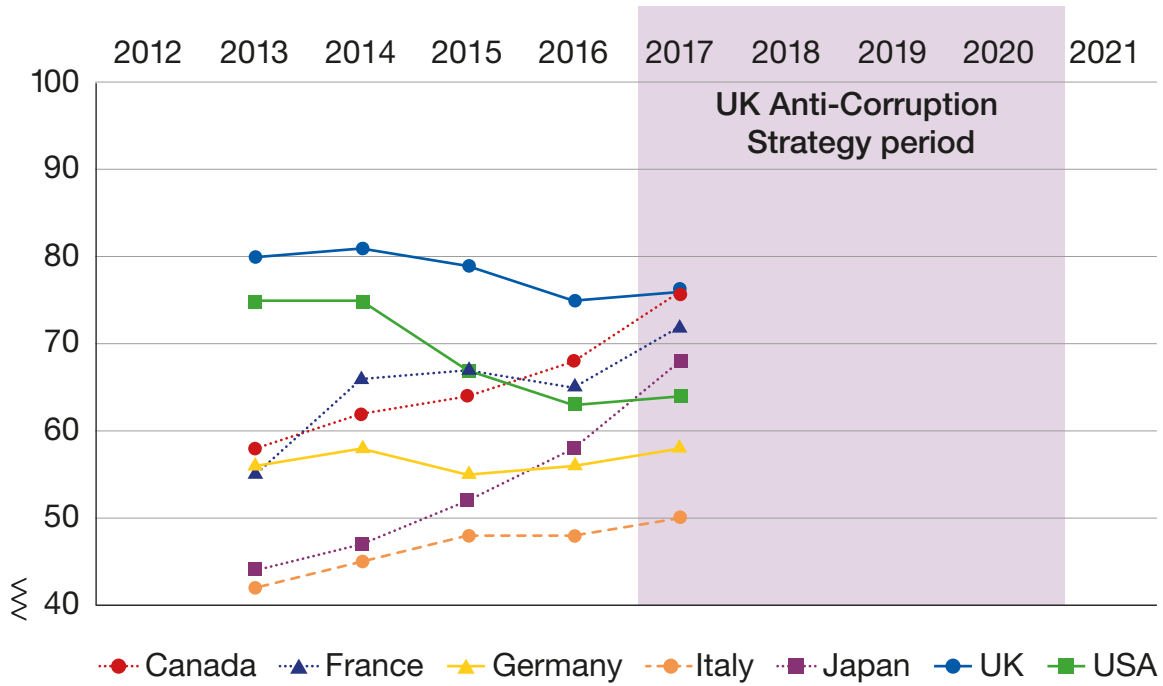
Indicator	Previous score	Current score	Ranking	Trend
Indicators of Regulatory Policy and Governance (IRPG) (aggregate composite indicator on stakeholder engagement)	2.96 (2014)	3.06 (2017)	N/A	+3%
Open Budget Survey (OBS)	74 (2017)	70 (2019)	=19/117	-5%
Open Data Barometer (ODB)	75 (2016)	76 (2017)	2/30	+1%

The indicators in this basket have not reported new data since the Year 2 Update.

## Open Budget Survey



## Open Data Barometer



# Basket 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 feel personally obliged to report corruption?” (Q7)	91% (2013)	83% (2017)	N/A	-8 %
Global Competitiveness Index (GCI) “In your country, to what extent does organised crime impose costs on businesses?” <sup>4 5</sup>	5.4 (2018)	4.7 (2019)	70/141	-13%
Rule of Law Index (RLI) “absence of corruption”	0.83 (2019)	0.82 (2020)	10/128	-1%
Rule of Law Index Component 2.3: “Government officials in the police and the military do not use public office for private gain.”	0.86 (2019)	0.85 (2020)	22/128	-1%
Rule of Law Index Component 8.5: “Criminal system is free of corruption.”	0.87 (2019)	0.86 (2020)	12/128	-1%
Number of corruption related offence reports to the police (ONS) (Table F8)	99 (Jan to Dec 2019)	117 (Jan to Dec 2020)	N/A	+18%

4 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.

5 There is a 2020 GCI report, however it is a special edition related to COVID-19 and doesn't include this statistic. Therefore, it is not included in this update.

Indicator	Previous score	Current score	Rank	Trend
Number of 'Fraud by abuse of position' offences recorded by Action Fraud (ONS) (Table A5) <sup>6</sup>	2,810 (Jan to Dec 2019)	2,885 (Jan to Dec 2020)	N/A	+3%
FATF Mutual Evaluation 2018 (Assessments of 11 immediate outcomes)	Highly effective: 4  Substantially effective: 4  Moderately effective: 3	N/A		

The first three indicators in this basket have not reported new data since Year 2.

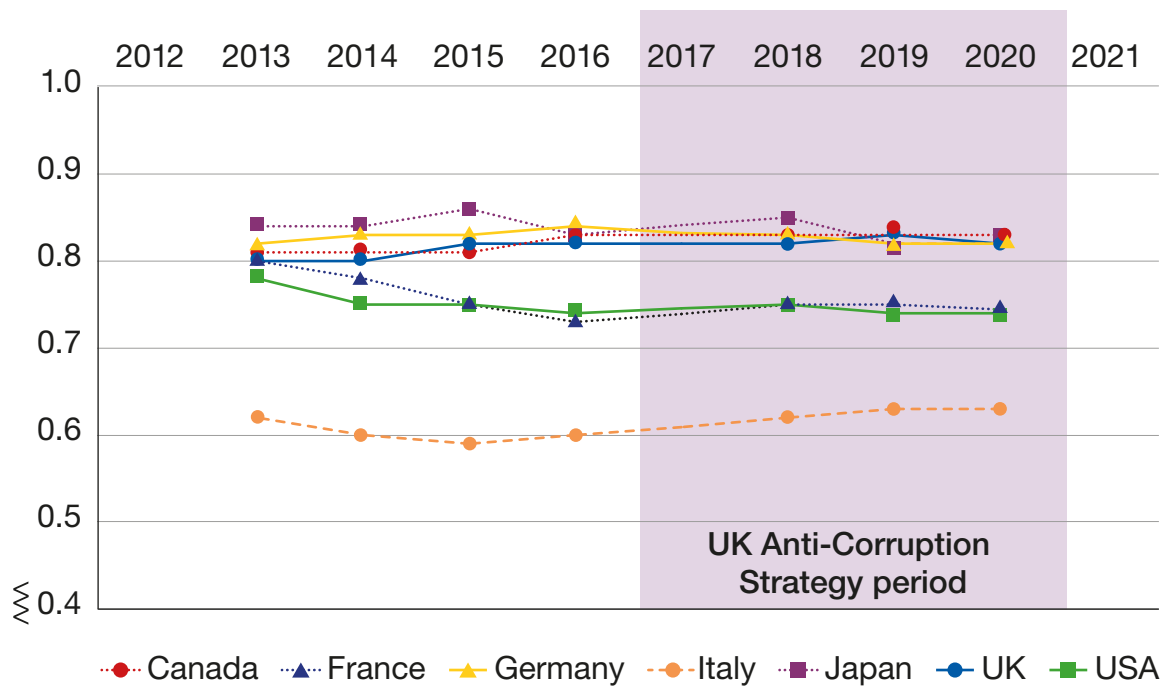
The RLI, an expert assessment combined with citizen opinion survey, indicates a very marginal decline regarding absence of corruption from 2019 to 2020. However, these changes are very small and when considering a longer temporal frame, there has been stability in since 2015. Therefore, perceived corruption within the government and criminal system has not changed.

The ONS source measures corruption offences recorded by the police under the Bribery Act (2010). This shows a slight increase (18%) from the previous year. While it is possible this variation maybe reflective of more corruption and bribery, this cannot be concluded. Other drivers might include an increase in public confidence to report, rather than a tangible increase in corruption crime, for example.

In the same year, the ONS report that 'Fraud by abuse of position' offences reported to Action Fraud increased by 3%. This offence is defined as when a person occupies a position in which he is expected to safeguard, or not to act against, the financial interests of another person, dishonestly abuses that position and intends, by means of the abuse of that position to make a gain for himself or another or to cause loss to another or to expose another to risk of loss. However, these statistics measure only the offences recorded, rather than those investigated and confirmed to be corruption incidences, and so caution is required.

6 New source, included as a corruption indicator for the first time in the 2020 publication.

## Rule of Law Index – ‘Absence of Corruption’



# Basket 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
Doing Business assessment (DBA) – protecting minority investors	75 (2019)	84 (2020)	7	+9
Global Corruption Barometer (GCB) “How many of the following business executives do you think are involved in corruption?” (Q 2I)	49% (2013)	21% (2017)	N/A	-28%
Global Fraud Survey (GFS) – “Do bribery/corrupt practices happen widely in business in your country?” (% yes)	28% (2017)	34% (2018)	N/A	+6%
Global Economic Crime and Fraud Survey (GECFS) – Percentage of UK respondents that report having experienced bribery and corruption in the last two years (% yes)	23% (2018)	25% (2020)	N/A	+2%
Exporting Corruption Report (ECR)	Active Enforcement (2020)	N/A		

The second and third indicators in this basket have not reported new data since Year 2.

The DBA aims to measure measures the strength of minority shareholder protections against misuse of corporate assets by directors for their personal gain as well as shareholder rights, governance safeguards and corporate transparency requirements that reduce the risk of abuse. The assessment indicates the UK has improved since the last assessment and has an overall global ranking of 7th, meeting more measures of quality. The UK scored particularly high on disclosure (10/10) and transparency (6/7), and shareholder rights (6/6), indicating more honesty about minority shareholders' rights in related-party transactions and in corporate governance.

The GECFS suggests an increase in businesspeople who report having experienced corruption in the UK over the last two years. However, between 2016 and 2018, this increase was 17%; while still increasing, corruption is much more stable from 2018-2020.

# Basket 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?” (Q4)	10% ‘effective to very effective’ (2013)	34% ‘fairly well to very well’ (2017)	N/A	+24%
Edelman Trust Barometer (ETB) “How much do you trust government to do what is right?”	36 (2020)	45 (2021)	N/A	+25%
Gallup World Poll “Do you have confidence in the national government?”	0.39 (2019)	0.31 (2020)	134/167	-20.5%
Gallup World Poll “Public Trust in Politicians”	0.64 (2019)	0.64 (2020)	17/167	0%
Gallup World Poll “Use of public office for private gain”	0.85 (2019)	0.85 (2020)	11/167	0%

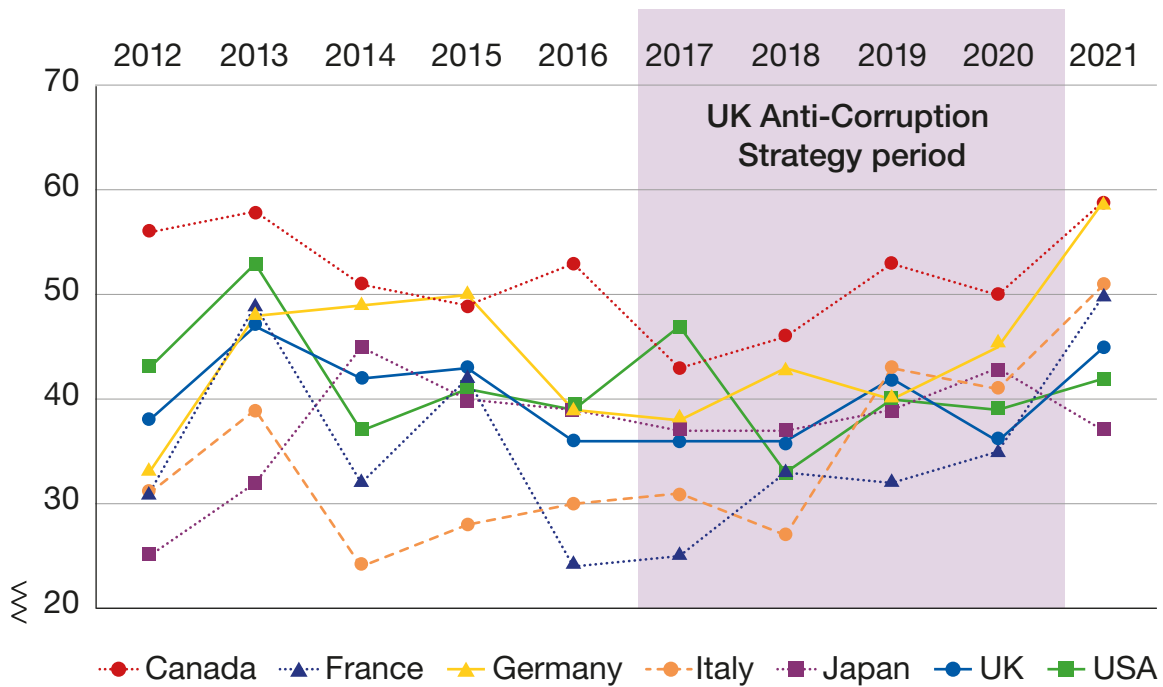
The first indicator in this Basket have not reported new data since Year 2.



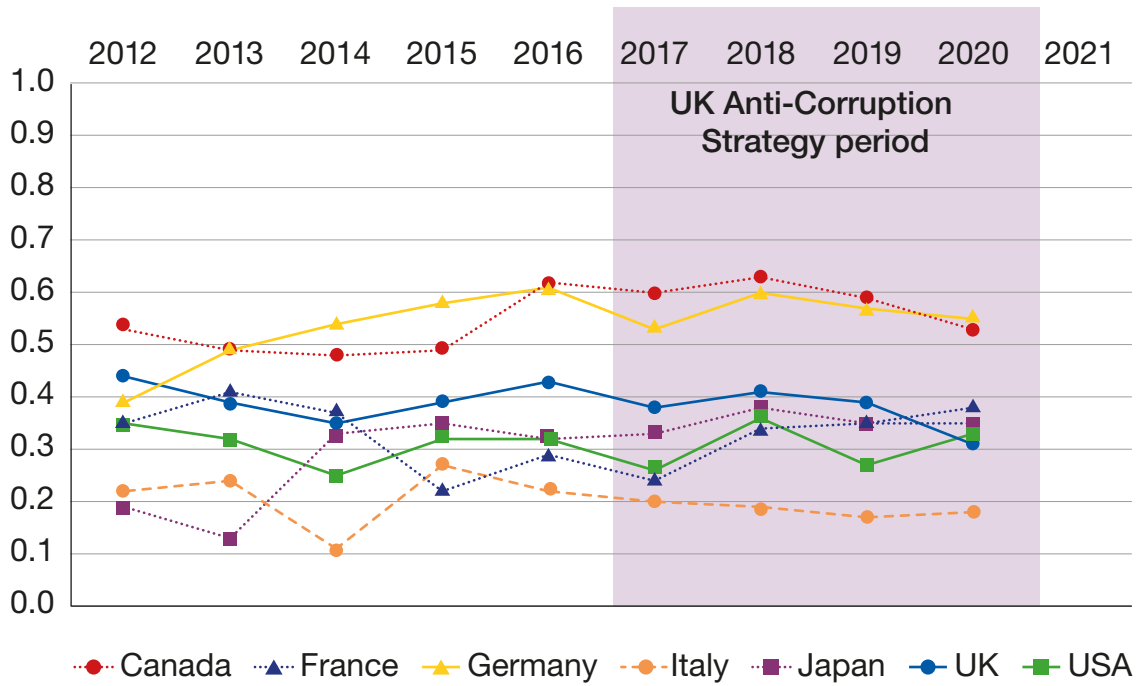
The Edelman Trust Barometer (ETB) and the Gallup World Poll (GWP) are useful indicators regularly produced to provide a measurement of public opinion. In 2021, public trust in government increased fairly substantially. This is in contrast to the 2019-20 data which demonstrated a decrease in trust. In a similar vein, 2020 data from GWP shows that confidence in government is also decreased from the previous year.

There are some indicators (GWP) which have remained stable from last year, notably trust in politicians and the use of public office for private gain.

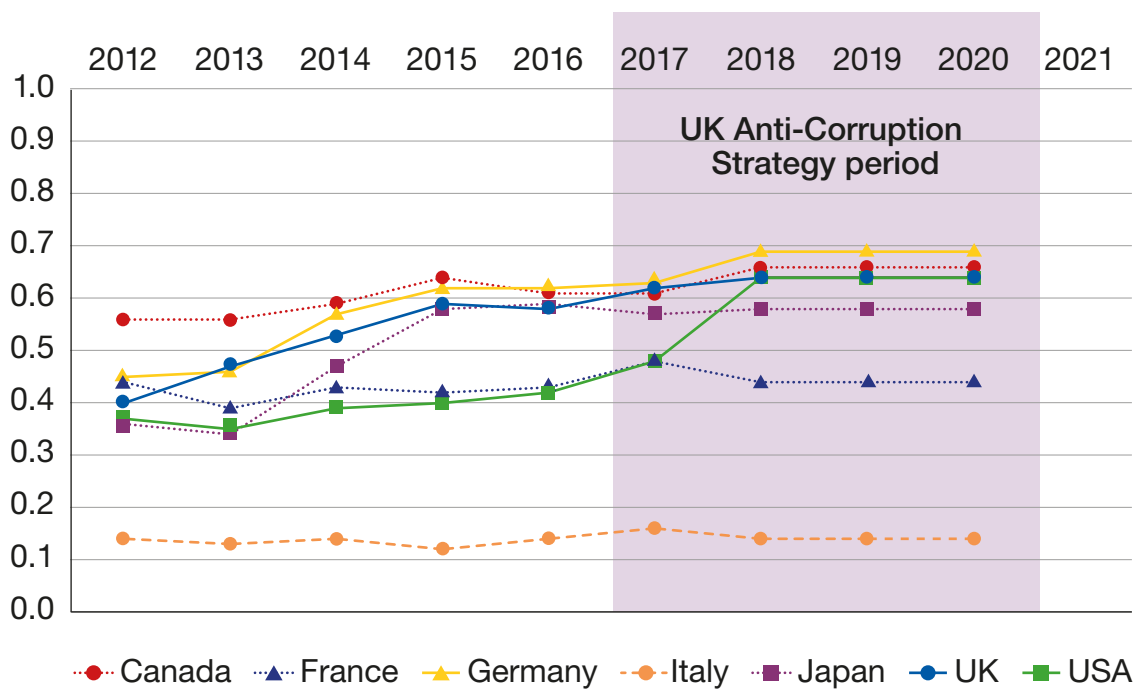
### Edelman Trust Barometer: Trust in Government (%)



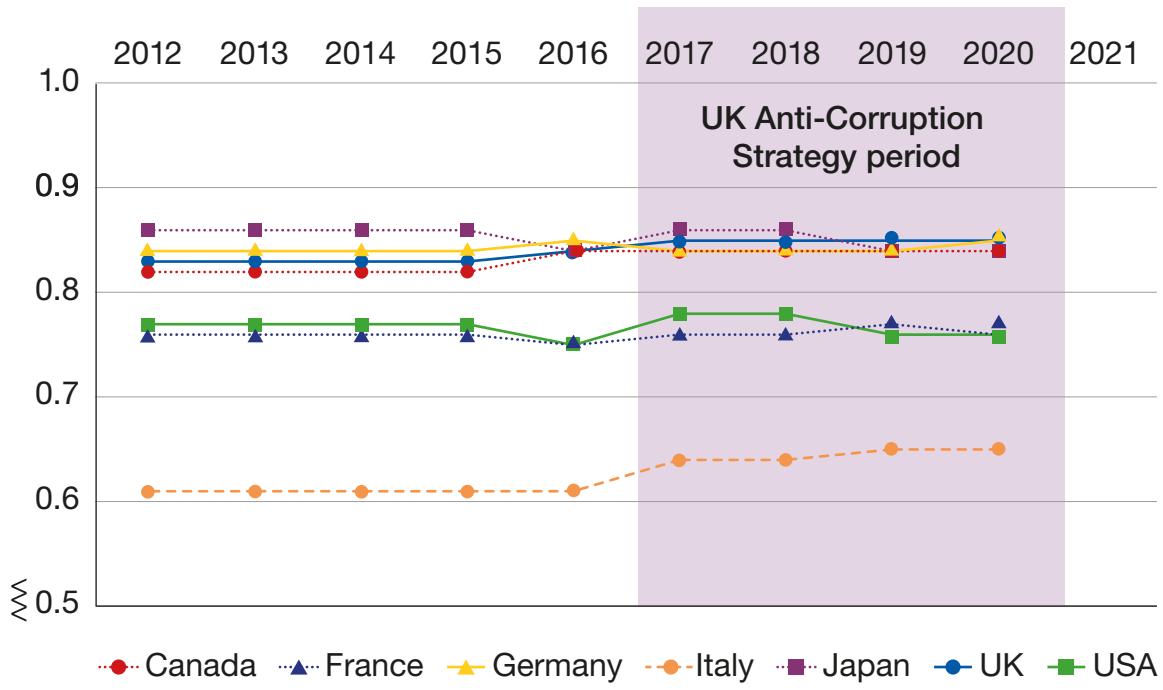
Gallup World Poll: “Do you have confidence in the national government?”



Gallup World Poll: “Public Trust in Politicians”



Gallup World Poll: "Use of public office for private gain"



# Basket 5: 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.

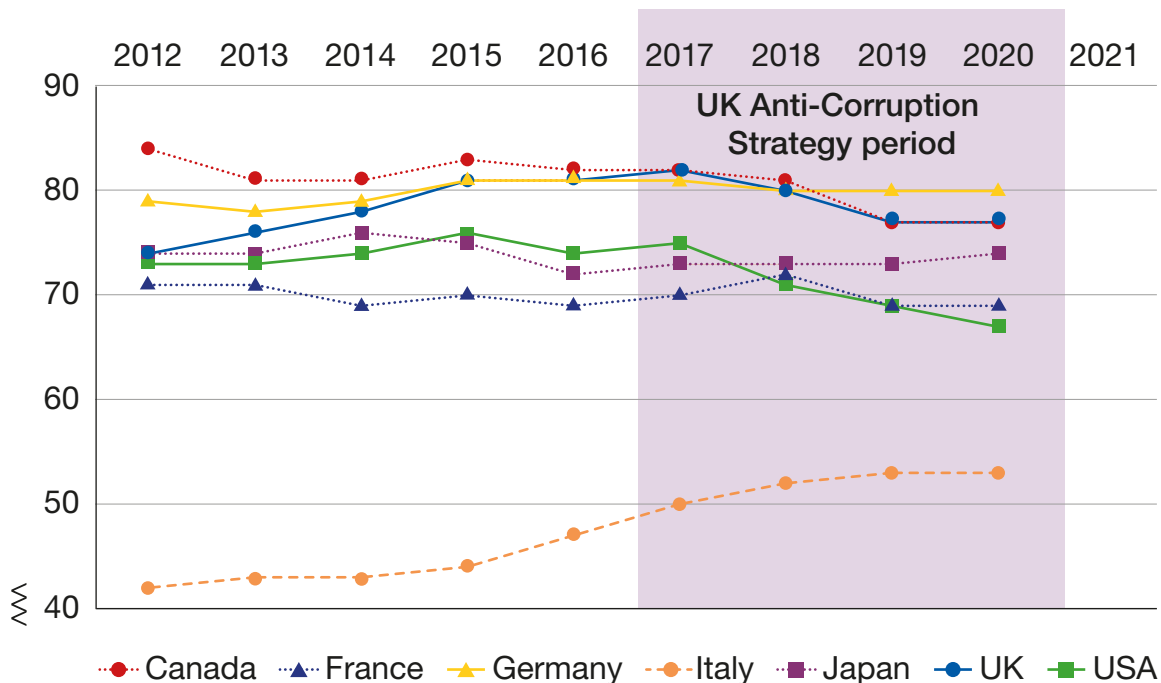
Indicator	Previous score	Current score	Ranking	% change
The Corruption Perception Index (CPI)	77 (2019)	77 (2020)	11/180	0%
Control of Corruption Index (CCI)	1.83 (2018)	1.77 (2019)	93.75 percentile	-3%
Index of Public Integrity (IPI)	9.10 (2017)	8.83 (2019)	10/117	-3%
The Financial Secrecy Index (FSI)	42 (2018)	46 (2020)	12/133	+10%

The CPI remained stable. This index ranks countries and territories by their perceived levels of public sector corruption according to experts and business people. However, with a score of 77, the UK fares well and is ranked 11th among the 180 countries measured, indicating that the UK tackles corruption effectively.

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 decreased year-on-year since 2016, and it is currently in the 93rd percentile rank (where 100 corresponds to the highest rank). The indicator is based on over 30 underlying data sources which were rescaled and combined using a statistical methodology known as an unobserved components model. A key feature of the methodology is that it generates margins of error for each governance estimate. These margins of error need to be taken into account when making comparisons across countries and over time. Given the small percentage change from last year, it is reasonable to conclude that the overall trend of control of corruption is stable.

The UK's FSI score was relatively static from 2015 to 2018, although has since declined in 2020. Despite this, the UK's secrecy score was the 5th lowest (lower scores equate to better performance) of the 133 countries and territories assessed in 2020. However, due to a large-scale weighting as a result of the UK accounting for 16% of the global market in offshore financial services, the UK is ranked as the 12th 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. The FSI methodology notes that of the four options to combine the secrecy scores of the UK and its Overseas Territories and Crown Dependencies, three 'result in the UK and its satellite network of secrecy jurisdictions top[ping] the FSI by a large margin', implying that when the UK performance is combined with that of the Overseas Territories and Crown Dependencies, it is the most problematic/secret combined jurisdiction in the world.

### 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 wider civil society and government departments regarding 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 Anti-Corruption Strategy.

- Being **relevant** and **specific**. Indicators need to specifically address 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 underlying raw data.
- 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.

# What's different this year?

## New sources

Any new sources introduced in this year's publication have been highlighted with a footnote. These were included following consultation with government department and civil society representatives.

This document is published annually, and the sources included are re-evaluated at each iteration. All existing sources have been updated where possible. However, some changes have been made:

- in basket 2 (measuring the corruption threat to UK national security), we have added a measure of the number of 'Fraud by abuse of position' offences recorded by Action Fraud
- From basket 4 (measuring public confidence in the UK's domestic and international institutions), we have removed a GWP indicator labelled 'Do you have confidence in the honesty of elections?' as it's no longer measured by Gallup, and so no more updates could be provided.

# 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> <p>a. Identify and manage the risks posed by insiders at UK Ports.</p> <p>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.</p> <p>c. Improve the way information is shared and actioned amongst key partners.</p> <p>d. Work with commercial operators at UK Ports to improve physical security.</p> <p>e. Share best practice amongst both the public and private sectors working in the borders environment and to improve the security culture.</p>	Home Office	■	<p>Ongoing Commitment</p> <p>Ongoing programme of work being implemented across government, overseen by the Homeland Security Group and by Border Force</p> <p>2020 deliverables include:</p> <ul style="list-style-type: none"> <li>continued operation of the Insider Threat Programme Board to oversee and co-ordinate work across government and law enforcement to mitigate insider activity at the border</li> </ul>



**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>(continued)</p> <p>f. Make better use of technology to detect and deter corrupt activity at UK Ports.</p>	<p>(continued)</p> <p>Home Office</p>	<p>■</p>	<p>(continued)</p> <ul style="list-style-type: none"> <li>continued delivery of a programme to improve Border Force’s internal response to insider threats, raise awareness, create a culture for staff to raise vulnerabilities or pressures, develop new systems and to identify and address risks at the earliest opportunity and work with key partners in a joined-up response</li> <li>delivery of a new data sharing capability in the aviation sector, to improve checks on those with privileged access at UK airports</li> <li>provision of guidance to transport sectors on how to mitigate the risk from insiders brought about by COVID-19</li> </ul>

**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	(continued)	(continued) Home Office	■	(continued) <ul style="list-style-type: none"><li>• closer working between law enforcement agencies both operationally and to learn lessons, for example Border Force is now represented at the NPCC Anti-corruption Advisory Group</li><li>• 2,458 members of its staff have received Insider Threat awareness sessions in 2020</li></ul>

## 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
1.2	<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> <p>a. Improve training in HMPPS, to strengthen staff resilience and reduce risk.</p> <p>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.</p> <p>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).</p>	Ministry of Justice – HM Prison and Probation Service	■	<p>Ongoing commitment</p> <p>Strategy implementation began in Year 2 and is now fully staffed</p>
1.3	Increase transparency and improve accountability in policing.	Home Office	■	Completed

## 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
	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.		■	Completed in Year 3 via: <ul style="list-style-type: none"> <li>• Police (Conduct) Regulations 2020</li> <li>• Police (Complaints and Misconduct) Regulations 2020</li> <li>• Police (Performance) Regulations 2020</li> <li>• Police Appeals Tribunals Rules 2020</li> </ul> See Review of 2020 for details
	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.		■	Completed in Year 1

## 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
1.3	(continued)  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.	(continued)  Home Office	■	(continued)  Completed in Year 1
1.4	Publish by the end of 2017 new professional guidance and Codes of Practice on Vetting requirements for individuals serving in policing (College of Policing).	Home Office	■	Completed in Year 1  A revised Authorised Professional Practice was developed in 2020 for publication in 2021
1.5	Strengthen protections for police whistle-blowers by implementing reforms included in the Policing and Crime Act 2017 and amending regulations in 2019.	Home Office	◆	Completed in part  The secondary legislation outlined in Commitment 1.3 implements many of the reforms from the 2017 Act  See Review of 2020 for more details

## 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
1.6	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.	Home Office	■	<p>Completed in Year 1</p> <p>The NPCC also produced a strategy on Abuse of Position for Sexual Purpose (APSP). This strategy has been recently reviewed by the NPCC and is considered to remain both accurate and current</p> <p>The NPCC has now produced a good practice ‘checklist’ for forces to adopt, designed to ensure consistency and accuracy when dealing with such incidents</p> <p>The National Counter Corruption Intelligence Analysts Working Group has devised a universal keyword list enabling forces to more easily monitor force devices, as a method of identifying concerns around APSP</p>
1.7	Reform the Independent Police Complaints Commission, which will be known from 2018 as the Independent Office for Police Conduct (IOPC) through:	Home Office	■	Completed

## 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
	a. Reformed corporate governance and a single line of accountability for investigations, enabling the organisation to deliver more investigations into serious allegations.			Completed in Year 1
	b. Strengthened powers as part of the package delivered through the Policing and Crime Act to overhaul the police complaints and discipline systems.			Completed in Year 3 See Review of 2020 for details

## 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
1.8	Undertake increased joint working between the Ministry of Defence, national law enforcement and police partners to further enhance co-ordination of intelligence-led operations against high priority corruption targets, in order to increase deterrence, disruption and detection.	Ministry of Defence	■	<p>Completed in Year 2</p> <p>Additional activity in 2020 MoD Police:</p> <ul style="list-style-type: none"> <li>collaborated with the NCA-led UK International Bribery and Corruption Working Group sharing intelligence, knowledge and working practices/ experiences</li> <li>contributed casework, intelligence and intelligence requirements in the 2020 SFO Strategic Assessment; identifying areas of vulnerability including the anticipated significant uplift in the UK Defence budget</li> <li>undertook criminal investigations in the UK (England and Scotland), Italy, South Korea and USA where ‘corrupt’ insiders have ‘enabled’ crime against the UK MOD including the commission of Prevent of Corruption Act/ Bribery Act offences</li> </ul>



## 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
1.9	<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	■	<p>On track for completion</p> <p>Programme of work being implemented. 2020 activity includes:</p> <ul style="list-style-type: none"> <li>working to develop policy around insider threat detection, leaks, and improved security data aggregation</li> <li>securing additional funding in order to sponsor the creation of a dedicated Security Incident Policy and Investigation Team (SIPIT), which will help provide central co-ordination and oversight to security investigations across Defence</li> <li>refreshing and updating significant elements of MOD's central security policy document to better reflect improved departmental threat understanding and revised working practices</li> </ul>

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

### Goal 2 – Increased awareness of the insider threat across sectors

No.	Commitment	Department/ Agency	Status	Comment
1.10	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.	Centre for Protection of National Infrastructure	■	Completed  Reported in Years 1 and 2
1.11	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 the common law offence.	Ministry of Justice	■	On track for completion  <b>Law Commission review</b> published in Year 3  See Review of 2020 for details

## 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

No.	Commitment	Department/ Agency	Status	Comment
2.1	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.	Business, Energy and Industrial Strategy	■	Completed in Year 1
2.2	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.	Business, Energy and Industrial Strategy; Cabinet Office	●	See Review of 2020 for details
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, Commonwealth and Development Office, Ministry of Justice	■	Ongoing commitment See Review of 2020 for details

## 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

No.	Commitment	Department/ Agency	Status	Comment
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, Commonwealth and Development Office, Ministry of Justice	■	Completed in Year 2
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 See Review of 2020 for details

**Priority Area 2: Strengthen the integrity of the UK as an international centre (continued)**

**Goal 2 – Stronger law enforcement, prosecutorial and criminal justice action**

No.	Commitment	Department/ Agency	Status	Comment
2.6	Establish a new Minister for Economic Crime in the Home Office.	Home Office	■	Completed  James Brokenshire MP appointed Minister of State in February 2020 with the economic crime portfolio
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	■	Completed in Year 1, meetings continue to be held regularly
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 co-ordinate the overall law enforcement response; and increase the UK's ability to investigate high-end economic crime.	Home Office	■	Completed in Year 1  See Review of 2020 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	■	Completed  The Criminal Finances Act came into effect in 2018 for all parts of the UK except Northern Ireland <sup>7</sup>

<sup>7</sup> The outstanding provisions were commenced in Northern Ireland on 28 June 2021. More details will be provided in the Year 4 Update.

**Priority Area 2: Strengthen the integrity of the UK as an international centre (continued)**

**Goal 2 – Stronger law enforcement, prosecutorial and criminal justice action**

No.	Commitment	Department/ Agency	Status	Comment
2.10	Work with partners to strengthen co-operation with international partners on recovering criminal assets, building on the first meeting of the Global Forum for Asset Recovery in December 2017.	Home Office	■	<p>Ongoing commitment</p> <p>2020 activity includes:</p> <ul style="list-style-type: none"> <li>• establishing the CPS-led international proceeds of crime working group to identify and tackle key issues</li> <li>• holding a roundtable with civil society on asset return and feeding this into wider HMG asset return policy</li> <li>• in December 2020 the Home Office began the process to commence outstanding provisions of the Criminal Finances Act 2017 in Northern Ireland by publicly consulting on changes to four codes of practice. This will significantly improve Northern Ireland’s ability to recover illicit assets and tackle financial crimes including money laundering</li> </ul>

**Priority Area 2: Strengthen the integrity of the UK as an international centre (continued)**

**Goal 2 – Stronger law enforcement, prosecutorial and criminal justice action**

No.	Commitment	Department/ Agency	Status	Comment
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 Review of 2020 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 and NDEC  See Review of 2020 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	■	Completed by means other than originally envisaged  Due to restrictions on Parliamentary time, this order has been postponed. In the meantime, the NCA is able to request that the SFO perform a task pursuant to Section 5 (1) Crime and Courts Act 2013. This is known as a 'Voluntary Tasking'. Inter-agency tasking is being considered in the round in the process of implementing the SOC Strategy Review recommendations, and it is likely this will be dealt with as part of that wider work

## Priority Area 2: Strengthen the integrity of the UK as an international centre (continued)

### Goal 2 – Stronger law enforcement, prosecutorial and criminal justice action

No.	Commitment	Department/ Agency	Status	Comment
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	■	Completed  <b>Response</b> to Call for Evidence published in November 2020  See Review of 2020 for details
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	■	Ongoing commitment  In February 2020 the Economic Secretary to the Treasury upheld the decision to impose two monetary penalties against Standard Chartered Bank for breaches of Article 5(3) of EU Council Regulation 833/2014 and Regulation 3B of The Ukraine (European Union Financial Sanctions) (No.3) Regulations 2014. The total penalty value for these breaches was £20,471,809.83



**Priority Area 2: Strengthen the integrity of the UK as an international centre (continued)**

**Goal 2 – Stronger law enforcement, prosecutorial and criminal justice action**

No.	Commitment	Department/ Agency	Status	Comment
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	■	<p>Completed in Year 2</p> <p>Further activity in 2020 includes:</p> <ul style="list-style-type: none"> <li>• a number of engagements on changes to the UK’s sanctions framework following the exit from the EU</li> <li>• OFSI has published regular online content including blogs and non-statutory, sectoral guidance for specific sanctions regimes and sectors, to increase industry and general public awareness of financial sanctions</li> </ul>
2.17	Continue to assess the effectiveness of financial sanctions to prevent breaches, including awareness of industry’s reporting obligations to OFSI.	HM Treasury	■	<p>Ongoing commitment</p> <p>OFSI has conducted its annual review for the 19/20 period of its implementation of financial sanctions. During this period, it received 140 reports of suspected breaches of financial sanctions, up from 99 reports in 2018/19 review period and 122 reports in 2017/18 period</p>

**Priority Area 2: Strengthen the integrity of the UK as an international centre (continued)**

**Goal 2 – Stronger law enforcement, prosecutorial and criminal justice action**

No.	Commitment	Department/ Agency	Status	Comment
2.18	<p>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.</p>	City of London Police	■	<p>Ongoing commitment</p> <p>Completed in Years 1 and 2</p> <p>Activities in 2020 included:</p> <ul style="list-style-type: none"> <li>• continued delivery of virtual anti-corruption training programme in Ukraine on behalf of the NCA</li> <li>• carried out a learning needs analysis on behalf of the International Anti-Corruption Co-ordination Centre with eight anti-corruption organisations in Associate Member jurisdictions</li> <li>• continued delivery of one week Bribery Investigation course to UK forces</li> </ul>

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

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

No.	Commitment	Department/ Agency	Status	Comment
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 <b>Second OPBAS report</b> published in March 2020 which identified that both accountancy and legal sectors had made strong improvements

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

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

No.	Commitment	Department/ Agency	Status	Comment
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	■	<p>Ongoing commitment</p> <p>In 2020 JMLIT supported 111 referrals to the Banking Sector Operations Group (BSOG) and the Insurance and Investment Sector Operations Group (IISOG). Referrals to these groups over the past year have supported the following results:</p> <ul style="list-style-type: none"> <li>• 45 arrests, from leads generated through JMLIT+ activity</li> <li>• 222 suspects identified, directly supporting ongoing investigations</li> <li>• 1,758 accounts identified, which were previously unknown to law enforcement</li> <li>• £24,559,285 restrained or seized</li> <li>• 90 POCA orders granted</li> </ul>

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

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

No.	Commitment	Department/ Agency	Status	Comment
2.21	(continued)	(continued)  National Crime Agency	■	(continued)  Activity in 2020 also includes: <ul style="list-style-type: none"> <li>• development and implementation of a new strategy</li> <li>• creation of new governance around public-private partnership activity including a new Public Private operational Board</li> <li>• expansion of JMLIT activity across economic threats including fraud and bringing in new partners</li> <li>• creation of a COVID-19 Fusion Cell, a public private partnership as a response to the changing economic crime threat posed by the pandemic</li> </ul>

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

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

No.	Commitment	Department/ Agency	Status	Comment
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	■	<p>Ongoing commitment</p> <p>Being delivered through the international illicit finance campaign</p> <p>Activity in 2020 includes:</p> <ul style="list-style-type: none"> <li>• multi-departmental, multi-jurisdictional country action plans signed under the International Illicit Finance Strategy</li> <li>• development and endorsement of the International Centre of Excellence inception phase</li> <li>• co-chairing of strategic projects at the Financial Action Task Force (FATF) including the Company Beneficial Ownership review</li> </ul>

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

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

No.	Commitment	Department/ Agency	Status	Comment
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  Activity in 2020 includes: <ul style="list-style-type: none"> <li>revising JFT structure and objectives</li> <li>devising a national fraud action plan</li> <li>improving the Action Fraud service</li> <li>increasing law enforcement resources</li> <li>leading an operation to step up law enforcement's response to high-harm, priority frauds such as courier, romance, investment and payment diversion frauds</li> </ul>
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  See Review for 2020 activity

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

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

No.	Commitment	Department/ Agency	Status	Comment
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	■	Completed in Year 2



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

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

No.	Commitment	Department/ Agency	Status	Comment
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	■	Completed  Profession launched in Year 1. Profession currently has 6,749 members  See Review of 2020 for details
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	■	On-track for completion  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
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	■	Ongoing commitment  The annual Fraud Landscape Report covering 2019 was published in February 2020 and included information on the progress made to embed the Counter Fraud Functional Standard across the function and how government departments and their arm's-length bodies are performing against the Standard

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

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

No.	Commitment	Department/ Agency	Status	Comment
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	■	Completed in Year 2
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  Elections Bill prepared to strengthen the integrity of elections and ensure that our democracy remains secure, fair, modern and transparent.

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

#### Goal 2 – A more open government that is trusted by citizens, with robust protections for whistleblowers

No.	Commitment	Department/ Agency	Status	Comment
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	■	On-track for completion  UK update provided to GRECO in respect of progress against 2017 recommendations. Consideration of our 5th round compliance report by GRECO plenary has been postponed due to backlog of reports caused by the impact of COVID-19  Consideration of compliance report undertaken in March 2021 (to be reported in Year 4 Update) <sup>8</sup>
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

<sup>8</sup> The UK report was considered in March 2021, further information will be provided in the Year 4 Update

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

### Goal 2 – A more open government that is trusted by citizens, with robust protections for whistleblowers

No.	Commitment	Department/ Agency	Status	Comment
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 due to pandemic respons.  See Review of 2020 for details
3.11	Implement legislation to provide protection to whistleblowers making job applications in the health sector and in children’s social care at the earliest opportunity.	Department for Health, Department for Education	■	On-track for completion  Completed for health sector in Year 1  Informal exploratory engagement with key stakeholders conducted in late 2019/early 2020. Plans to proceed with consultation were put on hold due to competing COVID-19 priorities

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

### Goal 3 – Strengthened UK private sector of integrity

No.	Commitment	Department/ Agency	Status	Comment
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	■	On-track for completion  Response to consultation on the reform of limited partnership law published in December 2018  Legislation will be introduced when Parliamentary time allows
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

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

### Goal 4 – Greater integrity in domestic and international sport

No.	Commitment	Department/ Agency	Status	Comment
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	■	Completed in Years 1 and 2
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	■	Completed in Year 1  To date, 26 of the 45 recommendations have been completed as of the end of 2020
3.17	Sign the Council of Europe Convention on the Manipulation of Sports Competitions in 2018.	Department of Digital, Culture, Media and Sport	■	Completed 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	■	Ongoing commitment  IPACS meeting hosted in Year 1  See Review of 2020 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

No.	Commitment	Department/ Agency	Status	Comment
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	■	Completed  See Review of 2020 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  The UK delivered a workshop at the Contracting 5 conference in Bogota, Columbia in February 2020 but work was then paused due to the COVID-19 pandemic

## 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

No.	Commitment	Department/ Agency	Status	Comment
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	■	<p>Ongoing commitment</p> <p>Conference held in December 2017</p> <p>Activity in 2020 includes:</p> <ul style="list-style-type: none"> <li>• Business Appointments and Ethics workshop in February</li> <li>• Developing counter corruption working with the NATO Building Integrity Programme</li> <li>• Workshop with NATO building integrity, procurement, and industry ethics community in December</li> </ul>
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	■	<p>Ongoing commitment</p> <p>See update on Commitment 5.18</p>



## Priority Area 4: Reduce corruption in public procurement and grants

### Goal 2 – Strengthened awareness and capability within contracting authorities.

No.	Commitment	Department/ Agency	Status	Comment
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	■	<p>Ongoing commitment</p> <p>Activity in 2020 includes:</p> <ul style="list-style-type: none"> <li>in October we <b>published</b> data on grants awarded in 2018/19 to open data standards (<b>360Giving</b>)</li> <li>we have been working to identify the reusable unique identifiers of grant recipients. We have worked with 360Giving to add unique identifiers to much of our data, and have since used these to relabel and remove duplicates from our grant recipient data ahead of publication of 2019/20 data in March 2021</li> <li>central government departments using Companies House identifiers by April 2020 had risen from 21% to 54%, a 157% increase</li> </ul>

## Priority Area 4: Reduce corruption in public procurement and grants

### Goal 2 – Strengthened awareness and capability within contracting authorities.

No.	Commitment	Department/ Agency	Status	Comment
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  The Cartel Awareness Campaign has been delayed due to COVID-19 restrictions, however, one-to-one engagement with stakeholders has continued, including with the Scottish Government
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	●	See Review of 2020 for details
4.9	Encourage procurers to investigate and report possible cartels, measuring the number of leads received by CMA.	Competitions and Market Authority	●	The cartels hotline received 957 unique contacts in 2020, a significant spike driven by the first lockdown and a refusal by firms to provide cancellation refunds. The CMA engaged with a range of public sector bodies over 2020, although private sector engagement was limited by pandemic restrictions
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	■	Completed in Year 2

## Priority Area 4: Reduce corruption in public procurement and grants

### Goal 2 – Strengthened awareness and capability within contracting authorities.

No.	Commitment	Department/ Agency	Status	Comment
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	■	Completed  <b>National Fraud Initiative Report</b> published.  See Review of 2020 for details
4.12	The Ministry of Defence will explore the use of anti-corruption data analytics to provide assessments across the whole of the procurement lifecycle, utilising data-sharing approaches such as the National Fraud Initiative.	Ministry of Defence	■	Ongoing commitment  Activity in 2020 includes: <ul style="list-style-type: none"> <li>• participation in the 2020/2021 National Fraud Initiative</li> <li>• collaborative analysis with the NHS Counter Fraud Authority. Data matching now completed</li> <li>• development of an awareness product which highlights the different types of fraud and red flag indicators at each stage of the procurement cycle</li> <li>• projects looking at inappropriate asset disposal, product substitution, counterfeit goods and duplicate invoicing</li> </ul>

## Priority Area 4: Reduce corruption in public procurement and grants

### Goal 3 – Greater confidence in efficient and legitimate contract management

No.	Commitment	Department/ Agency	Status	Comment
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	■	Completed in Year 1
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	■	Completed in Year 2
4.15	Oversee the effectiveness of the new NHS Counter Fraud Authority (established in November 2017).	Department of Health and Social Care	■	On-track for completion  See Review of 2020 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	■	Ongoing commitment  Function rebranded to 'Public Procurement Review Service' in November 2018  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

No.	Commitment	Department/ Agency	Status	Comment
5.1	Support other countries, bilaterally and at multilateral institutions, 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, Commonwealth and Development Office	■	Ongoing commitment  See Review of 2020 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 Ant-Corruption Unit	■	Ongoing commitment  See Review of 2020 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  Over 2020, FTA negotiations begun with the US, Australia, New Zealand and EFTA countries and anti-corruption provisions were considered as part of these negotiations  The UK-Japan Comprehensive Economic Partnership Agreement, signed in October 2020, reinforced obligations for both parties in relation to anti-corruption and efforts to eliminate bribery and corruption

## Priority Area 5: Improve the business environment globally

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

No.	Commitment	Department/ Agency	Status	Comment
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, Commonwealth and Development Office	■	Ongoing commitment  See Review of 2020 for details

## Priority Area 5: Improve the business environment globally

### Goal 2 – Enhanced international development finance and export finance practices

No.	Commitment	Department/ Agency	Status	Comment
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.	Foreign, Commonwealth and Development Office	■	Ongoing commitment  Tax policy review took place throughout 2020 a number of enhancements were made, including a requirement that the jurisdictions through which CDC invests are committed to the OECD Inclusive Framework on base erosion and profit sharing
5.6	Publish more investment information and encourage other Development Finance Institutions to do the same (CDC).	Foreign, Commonwealth and Development Office	■	Ongoing commitment  See Review of 2020 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.	Foreign, Commonwealth and Development Office	■	On-track for completion  See Review of 2020 for details

## Priority Area 5: Improve the business environment globally

### Goal 2 – Enhanced international development finance and export finance practices

No.	Commitment	Department/ Agency	Status	Comment
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	■	Completed in Year 2
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	■	Completed in Years 1 and 2



## Priority Area 5: Improve the business environment globally

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

No.	Commitment	Department/ Agency	Status	Comment
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; Foreign, Commonwealth and Development Office	■	Ongoing commitment  Being delivered through the Business Integrity Initiative  See Review of 2020 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

## Priority Area 5: Improve the business environment globally

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

No.	Commitment	Department/ Agency	Status	Comment
5.13	As part of the ongoing Foreign, Commonwealth and Development 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, Commonwealth and Development Office	■	On-track for completion  Being delivered by the FCDO 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

No.	Commitment	Department/ Agency	Status	Comment
5.14	Contribute to increased inward investment by supporting business-led initiatives aimed at strengthening anti-corruption good practice, 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	◆	Ongoing commitment  Due to be delivered through the Focus on Business initiative. This has been temporarily paused due to pandemic reprioritisation of staff and resources
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	◆	Ongoing commitment  Due to be delivered through the Focus on Business. This initiative has been temporarily paused due to pandemic reprioritisation of staff and resources
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	■	Ongoing commitment  The four-year report on the UK's Phase 4 Review is due in June 2021 and work is on-going to satisfy the recommendations contained in the review
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; Foreign, Commonwealth and Development Office	◆	Ongoing commitment  Being delivered through the Focus on Business and Business Integrity Initiatives

## Priority Area 5: Improve the business environment globally

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

No.	Commitment	Department/ Agency	Status	Comment
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 Review of 2020 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

No.	Commitment	Department/ Agency	Status	Comment
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; Foreign, Commonwealth and Development Office	■	<p>Ongoing commitment</p> <p>Post implementation review completed in Year 1</p> <p>Activity in Year 3 includes:</p> <ul style="list-style-type: none"> <li>• funding to EITI, Natural Resource Governance Institute and the World Bank’s Extractives Global Support Programme to provide technical assistance to countries seeking to implement EITI standards on extractives transparency</li> <li>• launching of <a href="#">new UK EITI website</a></li> <li>• appointment of Lord Callanan as the new UK EITI Champion</li> <li>• <a href="#">UK EITI Annual Review 2020</a> sets out the UK’s progress in implementing the EITI Standard over 2020 and summarises the data we published earlier this year on extractives payment flows made in calendar year 2019</li> </ul>

## Priority Area 6: Work with other countries to combat corruption

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

No.	Commitment	Department/ Agency	Status	Comment
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).	Foreign, Commonwealth and Development Office	■	<p>Ongoing commitment</p> <p>Activity in 2020 includes:</p> <ul style="list-style-type: none"> <li>continued funding of the UK's membership of EITI to enable it to offer technical advice</li> <li>continued funding to the World Bank Extractives Support Global Programme to help countries strengthen adherence to EITI Standards</li> <li>participating in two OECD events on commodity trading transparency as part of the Natural Resource Dialogue. These events were an opportunity for working 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</li> </ul> <p>(continued over)</p>

## Priority Area 6: Work with other countries to combat corruption

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

No.	Commitment	Department/ Agency	Status	Comment
6.2	(continued)	(continued)  Foreign, Commonwealth and Development Office	■	(continued)  state-owned enterprises, governments, traders, civil society and extractives companies
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).	Foreign, Commonwealth and Development Office	■	Completed  See Review of 2020 for details
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.	Foreign, Commonwealth and Development Office	■	On-track for completion  Completed for Pakistan in Year 1  The CRS has been introduced in Ghana, but the onsite security assessment required before sharing data is possible was delayed due to the pandemic
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.	Foreign, Commonwealth and Development Office	■	Completed  See Review of 2020 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

No.	Commitment	Department/ Agency	Status	Comment
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.	Foreign, Commonwealth and Development Office	■	Completed  Entries in the Open Ownership register increased to six million companies and 12 million entries  Achievements include a new national register in Ghana and supporting the sectoral registers of Nigeria and Myanmar
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.	Government Digital Service	◆	Being delivered through the GDS Global Digital Marketplace Programme  Activity in 2020 has included discovery projects in Mexico and Indonesia which included examining how beneficial ownership data can provide intelligence into the procurement processes. Working systems will be based upon this intelligence and will take longer to develop



## Priority Area 6: Work with other countries to combat corruption

### Goal 2 – Reduced levels of corruption in partner countries

No.	Commitment	Department/ Agency	Status	Comment
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	■	<p>On-track for completion</p> <p>As reported in Year 1, now being delivered through the International Illicit Finance Campaign</p> <p>Activity in 2020 includes:</p> <ul style="list-style-type: none"> <li>the cross-government International Illicit Finance Working Group (led by Home Office, FCDO, and HMT) continues to develop understanding of the nature and impact of international illicit finance through various methods such as classified risk assessments, Serious Organised Crime Joint Analysis (SOCJA) products or information sharing at multi-lateral institutions</li> </ul> <p>(continued over)</p>

## Priority Area 6: Work with other countries to combat corruption

### Goal 2 – Reduced levels of corruption in partner countries

No.	Commitment	Department/ Agency	Status	Comment
6.8	(continued)	(continued)  Home Office; Joint Anti-Corruption Unit	■	(continued)  <ul style="list-style-type: none"> <li>we have developed and are delivering a cross-government International Illicit Finance Strategy which provides a framework for the illicit finance campaign set out in the Serious and Organised Crime Strategy</li> </ul>
6.9	Develop new practitioner partnerships on institution integrity, sharing the best of the UK's professional expertise and strong institutions with developing countries.	Foreign, Commonwealth and Development Office	■	Completed in Year 2
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; Foreign, Commonwealth and Development Office; Home Office	■	Completed in Year 1

## Priority Area 6: Work with other countries to combat corruption

### Goal 2 – Reduced levels of corruption in partner countries

No.	Commitment	Department/ Agency	Status	Comment
6.11	<p>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.</p>	<p>Foreign, Commonwealth and Development Office</p>	<p>■</p>	<p>Completed in Year 1</p> <p>The Egmont Centre of Financial Intelligence Unit Leadership and Excellence (ECOFEL) continues to support Financial Intelligence Units (FIUs) globally to strengthen their role in leading countries efforts to combat money laundering, corruption and terrorist financing</p> <p>The eLearning platform now includes more than 16,000 training courses and best practise papers and has over 2,600 registered users. This online resource helps train anti-corruption actors and member countries to identify and address possible corruption, including money laundering</p>

## Priority Area 6: Work with other countries to combat corruption

### Goal 2 – Reduced levels of corruption in partner countries

No.	Commitment	Department/ Agency	Status	Comment
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.	Foreign, Commonwealth and Development Office	■	<p>Completed</p> <p>The initiative led by UNODC, Switzerland, and Ethiopia convened international expert meetings on an ad hoc basis, usually biennial, to develop and agree international guidelines on asset return (the Addis Guidelines). These were endorsed at the Global Forum on Asset Recovery (GFAR) in 2017 and are also known as the GFAR Principles</p> <p>The main objective now is for the Guidelines and Principles to become the norm in international asset return agreements. The UK has included the Guidelines in its own domestic policy. In 2020, the UK Home Office led an HMG process to develop the UK Asset Return Policy, which reflects the Addis Guidelines and GFAR Principles</p>

## Priority Area 6: Work with other countries to combat corruption

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

No.	Commitment	Department/ Agency	Status	Comment
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 is on hold due to necessary resourcing constraints of the global pandemic
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.	Foreign, Commonwealth and Development Office	■	Ongoing commitment  Delivered through support of Transparency International's Defence and Security programme  See Review of 2020 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	■	Ongoing commitment  Business Integrity UK continues to support the development of the Building Integrity Training and Education Centre in Ukraine and has delivered to over 450 officials in the Occupied Palestine Territories, Lebanon, Kazakhstan, Uganda, Afghanistan and Colombia

## How we will deliver the vision

### Improving our understanding of corruption

No.	Commitment	Department/ Agency	Status	Comment
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	■	<p>Ongoing commitment</p> <p>We commissioned the economic crime business survey and established a working group to oversee the delivery of the survey. We surveyed 5,000 people across sectors of specific interest and risk of corruption. The results of the survey were delivered in summer of 2020 and the Home Office is drafting a research paper to reflect the results that will be published in 2022</p> <p>We also commissioned deep dive research projects to develop a conceptual framework for corruption specific sectors of risk and interest. The research will also produce a deeper understanding of corruption by conducting expert interviews from across sectors to better understand the risks of corruption. This work will also produce suggestions for a framework of a UK research strategy</p>

## How we will deliver the vision

### Improving our understanding of corruption

No.	Commitment	Department/ Agency	Status	Comment
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  2020 had a focus on understanding and estimating the scale of corruption and identifying that corruption is a key enabler of other SOC threats
7.3	Improve how corruption is reported in national crime recording.	Home Office	■	Ongoing commitment  The Office of National Statistics regularly publishes the number of corruption related offences that have been reported to the police  The latest figures can be found on <a href="https://ons.gov.uk">ons.gov.uk</a>
7.4	Launch a new initiative to provide a reporting mechanism for allegations of bribery and corruption.	Home Office	■	On-track for completion  Digital Policing Portfolio devising mechanics for reporting mechanism to be housed on its website  A prototype was designed which is being piloted, with full implementation expected in 2022

## How we will deliver the vision

### Improving our understanding of corruption

No.	Commitment	Department/ Agency	Status	Comment
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 for Digital, Culture, Media and Sport	■	Ongoing commitment  From 2018/19 Grants data from across all UK grant-administering departments has been released to the 360Giving data standard, a recognised transparency format for data of this nature, allowing new levels of analysis and public oversight
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.	Foreign, Commonwealth and Development Office	●	The programme was discontinued  See Review of 2020 for details
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	■	Completed in Year 2



## How we will deliver the vision

### Improving our understanding of corruption

No.	Commitment	Department/ Agency	Status	Comment
7.8	Partner with the World Bank to help other countries measure and report their anti-corruption efforts for the UN Sustainable Development Goals.	Foreign, Commonwealth and Development Office	■	Completed by Year 3  Delivery was to UNODC (as opposed to World Bank) and no further funding was possible beyond Year 3 due to challenges posed by the global pandemic including the necessary reduction in 2020 UK Official Development Assistance in line with UK GNI
7.9	Support further IMF research into the costs and effective ways of tackling corruption, by providing three years of funding from April 2017.	Foreign, Commonwealth and Development Office	■	Completed by Year 3
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.	Foreign, Commonwealth and Development Office	■	Completed  There are 14 research grants ongoing including work to explore the impact of beneficial ownership measures, anti-money laundering, new forms of commodity-based money laundering, and trade and procurement. One of the research projects, which focusses on procurement, won the IMF's Innovation Anti-Corruption Challenge in 2020

## How we will deliver the vision

### Improving our understanding of corruption

No.	Commitment	Department/ Agency	Status	Comment
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, Commonwealth and Development Office	■	On-track for completion  We have commissioned Nottingham Trent University to provide contextual analysis of Public Procurement in Target Countries and employ behavioural experiments to measure the underlying drivers of corruption in the public procurement systems in Mexico, South Africa, Indonesia and Malaysia

## How we will deliver the vision

### Working Together

No.	Commitment	Department/ Agency	Status	Comment
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 2020 includes engagement with civil society (in particular the UK Anti-Corruption Coalition), 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	■	On-track for completion  Being delivered in relation to SARs and JMLIT  See priority area 2

## How we will deliver the vision

### Working Together

No.	Commitment	Department/ Agency	Status	Comment
8.3	Honour our Open Government Partnership commitments through close collaboration with civil society and the private sector.	Department for Culture, Media and Sport	■	<p>On-track for completion</p> <p>Work continued throughout 2020 on engaging with civil society, including:</p> <ul style="list-style-type: none"> <li>• topic-specific engagement with specific groups over flagship pieces of work such as the National Data Strategy and Local Area Democracy Forums</li> <li>• a Multi-stakeholder Forum strategic planning event held in December 2020 bringing together representatives from Civil Society, UK government departments and the Devolved Administrations</li> </ul>
8.4	Strengthen outreach to companies to strengthen integrity in business (as set out in section 3.5).	Home Office; Department of International Trade; Foreign, Commonwealth and Development Office	■	<p>Ongoing commitment</p> <p>Being delivered through the Business Integrity Initiative</p>

## How we will deliver the vision

### Working Together

No.	Commitment	Department/ Agency	Status	Comment
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, Commonwealth and Development Office	■	<p>Ongoing commitment</p> <p>Being delivered through civil society engagement and representation at multilateral institutions</p> <p>For example, in 2020:</p> <ul style="list-style-type: none"> <li>• OpenOwnership has consulted civil society to interrogate data</li> <li>• the OECD Global Anti-Corruption regional conference forum has been used to exchange views with civil society including through more regular surveys (collaborating with networks like Transparency International, Indonesia Business Links in Indonesia, Coalition for Business Integrity in Malaysia and Coalition Against Corruption in Thailand)</li> </ul>

## How we will deliver the vision

### Working Together

No.	Commitment	Department/ Agency	Status	Comment
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	◆	<p>Ongoing commitment</p> <p>We have worked closely with civil society and key leading academics to deliver the economic crime businesses survey, of which a research report will we hope to publish in the 2021. Civil Society and Academics were invited to sit on the steering board of the survey</p> <p>Key academics have been commissioned to carry out research to develop a conceptual framework of corruption how it manifests in specific sectors of risk and interest. The interim findings are expected in spring 2021</p>
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	■	<p>Ongoing commitment</p> <p>Being delivered through initiatives such as exploring the use of powers under the Sanctions and Money Laundering Act 2018 to target perpetrators of corruption</p>

## How we will deliver the vision

### Promoting International Standards and Partnerships

No.	Commitment	Department/ Agency	Status	Comment
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 See Review of 2020 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 See Priority 3 for IPACS update
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.	Cabinet Office	■	Ongoing commitment Being delivered through our 4th National Action Plan Work has begun on developing the 5th National Action Plan due for publication by the end of 2021

## How we will deliver the vision

### Promoting International Standards and Partnerships

No.	Commitment	Department/ Agency	Status	Comment
9.5	Consider the findings of the OECD Phase 4 evaluation on the UK's implementation of the OECD Anti-Bribery Convention.	Home Office	■	<p>On-track for completion</p> <p>Mid-term <a href="#">update to OECD</a> on Phase 4 Evaluation published in March 2019</p> <p>Final update and report due in June 2021</p>
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, Commonwealth and Development Office	■	<p>Completed</p> <p>A wide breadth and depth of work towards UNCAC implementation continued with 37 countries across four regional platforms now represented and 11 strategic partnerships formed with key multi-lateral organisations and regional fora. To date, over 7,000 stakeholders and anti-corruption practitioners have participated in regional events and 100 anti-corruption authorities and law enforcement bodies have received in-country capacity building to better prevent, detect, investigate and prosecute corruption</p>



## How we will deliver the vision

### Promoting International Standards and Partnerships

No.	Commitment	Department/ Agency	Status	Comment
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.	Foreign, Commonwealth and Development Office	■	On-track for completion  Through the World Bank hosted OGP Multi-Donor trust Fund (MDTF) (co-funded by the FCDO), the World Bank supported six civil society organisations (CSOs) through ‘co-creation awards’ to fund technical assistance and peer exchange opportunities to governments and CSOs to develop OGP commitments on technical themes including beneficial ownership, participatory budgeting, public finance management, open contracting and fiscal transparency
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

## How we will deliver the vision

### Promoting International Standards and Partnerships

No.	Commitment	Department/ Agency	Status	Comment
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/ Foreign, Commonwealth and Development Office	■	<p>Ongoing commitment</p> <p>UNODC through FCDO funding has increased developing countries capacities to undertake financial investigations of wildlife crime cases, with 37 ongoing or completed</p> <p>The Egmont Centre of Financial Intelligence Units Excellence and Leadership has helped to establish collaboration between law enforcement and Financial Intelligence Units to tackle illegal wildlife trade (IWT) related crime more effectively. A notable example was UNODC's provision of case support on financial investigations relating to IWT and forest crime in eight jurisdictions and supporting three jurisdictions on the freezing, seizing and recovery of assets</p>

## How we will deliver the vision

### Promoting International Standards and Partnerships

No.	Commitment	Department/ Agency	Status	Comment
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  We supported the Secretariat in developing the corruption benchmarks for Commonwealth countries. The benchmarks were due to be launched at Commonwealth Heads of Government Meeting 2020 in Rwanda (postponed to 2021 due to the pandemic)

## How we will deliver the vision

### Promoting International Standards and Partnerships

No.	Commitment	Department/ Agency	Status	Comment
9.11	Strengthen the capacity of the OECD to support members and developing countries to meet international standards on anti-corruption.	Foreign, Commonwealth and Development Office	■	Completed  We partially funded OECD Anti-Corruption and Integrity Forum 2020 with over 4,000 participants from 120 countries recorded as attending. Our funding also supported the Asia-Pacific Anti-Corruption Regional Conference Combatting Corruption in Infrastructure projects, raising awareness of the OECDs standards and guidelines for Anti-Corruption outside of OECD countries, and leading to the establishment of a permanent business integrity network under the Asia-Pacific Anti-Corruption Initiative

## How we will deliver the vision

### Monitoring and Reporting on Progress

No.	Commitment	Department/ Agency	Status	Comment
10.1	Publish progress updates on the GOV.UK website.	Joint Anti-Corruption Unit	■	Ongoing commitment  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	■	Ongoing commitment  Annual updates, including this Year 3 Update, are provided to Parliament and are available in the House of Commons Library. See Review 2020 for more details

