



**TRANSPARENCY
INTERNATIONAL UK**
fighting corruption worldwide

scandal: It's £2m to live
the Office won't look

Thai opposition party
government helped 11

Criminal wealth totalling £
has flowed through UK and
private jets, luxury yachts and
mansions - nearly twice as much
researchers previously thought

record £3bn in
'emic' corruption

2020/21 ANNUAL PLAN

Millions of dollars' worth of medicine
siphoned from the state controlled
possibly to be sold on the black market
missing drugs, counterfeit and
were making their ways to hospitals

counterterrorism aid
is extremist groups

Approved by the Board of Trustees 25 February 2020

Battle to seize £80m "McM
Homes were bought with drugs
court heard

Introduction

Transparency International (TI) is a global movement sharing one vision: a world in which government politics, business, civil society and the daily lives of people are free of corruption. Transparency International UK (TI-UK) is the UK national chapter of this movement. Our vision is a society in which:

- The lives of people in the UK and around the world are significantly improved;
- The health of our institutions is enhanced;
- We can trust the integrity of those in authority;
- There is no impunity for the corrupt at home or abroad.

We are the UK's leading independent Anti-Corruption organisation. For 25 years we have worked to expose and prevent corruption so that no one has to suffer its consequences. Our ground breaking research and work with governments, business and civil society has:

- Exposed corruption;
- Changed the systems that have enabled it to take root;
- Been key to our campaigns holding those responsible to account.

TI-UK is home to four major programmes.

Our **UK Anti-Corruption Programme (UKACP)** plays a critical role in fighting corruption at home and tackling the UK's role in global corruption. We work to end the UK's role as a safe haven for dirty money, protect public services from corruption, prevent the influence of big money in politics whilst ensuring those in public office do not abuse their position.

Meanwhile, the **Business Integrity Programme (BIP)** provides a leading independent voice and expertise in the private sector. We support UK and multinational companies based in the UK to prevent corruption and operate with integrity. We bring together leading experts through our Business Integrity Forum, increase best practice with sophisticated tools and training and work with senior business leaders to advance a progressive policy agenda to tackle corruption.

Our two other programmes are Global Thematic Network Initiatives (GTNIs) which TI-UK delivers on behalf of, and with a mandate from, the wider TI movement. GTNIs exist where we believe there is greater potential for tackling a particular area of corruption through cross border

approaches involving multiple TI chapters and other international stakeholders.

The **Transparency International Defence and Security Programme (TI-DS)** directly addresses the links between corruption and conflict. It recognises that when governance of the defence sector fails, it can lead to further instability and violent conflict. The programme exposes corruption's role as a threat to global peace and security whilst driving greater integrity in defence and security sectors. We work with governments, civil society and other stakeholders to reduce defence corruption risk on a country-by-country basis.

Finally, **Transparency International's Health Initiative (TI-HI)** exists to reveal and tackle the scourge of corruption that stands in the way of ensuring full return on human, research, development and economic investment in the health sector. We focus our efforts on healthcare research and development, procurement and service delivery. The programme explores corruption risk in these areas before developing tools and approaches to address them.

Purpose of the Annual Plan

2020 represents the final year of implementation of the 2017-20 TI-UK multi-year strategy. Therefore, this annual plan sets out the specific projects and initiatives required to both bring that framework to its conclusion whilst strengthening the organisation and its programmes in a manner responsive to their current state.

Following a significant period of growth for TI-UK during the current strategy period, this annual plan has a particular focus on delivering increased institutional fitness for purpose, thus ensuring all the impact of all programmes becomes greater than the sum of their parts. This coupled with various changes in senior leadership in the preceding year, will drive some objectives in this plan in to subsequent operational years.

A new strategic planning process for 2021-2025 will also be initiated in the early months of this business year.

TI-UK Strategy

The existing 2017-20 Strategic Framework is built around six key themes:

A changing world - the world's small but effective anti-corruption community is needed more than ever. A flourishing Transparency International will be required to play a key role in world affairs in the coming years; we acknowledge that need and our strategy is a declaration of intent that we expect to rise to the challenge.

Leveraging the UK's global role – we will mobilise resources and expertise from the UK to help the global fight against corruption, leveraging the UK's international role and acknowledging the UK's role in facilitating international corruption.

Innovation - in areas such as research and advocacy, fundraising and communications, we will introduce new means of collecting, analysing and disseminating information, with a new focus on using tech-driven solutions.

Increasing impact - we will increase the impact of our activities; we will prioritise growth in impact over growth in staff numbers.

Organisational strength – we will build a strong and sustainable organisation, putting in place the necessary measures to manage our growth.

Sustainable funding – we will aim for each programme to be self-sustaining according to its needs and up our game in fundraising and communications.

Tackling Corruption in 2020-21

As we finalised plans for the year ahead, the international community was still in the early stages of the battle to bring the Covid-19 virus pandemic under control. The unprecedented, immediate nature of this crisis in peacetime is well documented. At the time of writing, the longer-term human, social, and economic impacts worldwide are yet to be fully understood. What is clear, is that they will last for many years with enduring consequences for ways of life worldwide.

In the early phases of the crisis there have been disturbing examples of groups and individuals engaging in practices intended to secure their own personal gain or advantage. This ranges from the sudden suppression of civic space, the propagation of black market or falsified medical supplies, and even the jailing of those who have already exposed corruption in the Covid-19 response in their countries.

The direct implications for the work of Transparency International UK are twofold. Operationally, each of our four programme areas have had to recalibrate their plans in order to operate in the context of acute global disruption and, in particular, restrictions on travel and events for many months. Our financial projections have been reviewed at the start of the year to reflect the likely economic downturn. Methodically, our programmes will strive to achieve the difficult balance between the delivery of our planned, and still much needed, general anti-corruption activities whilst using our relevant expertise to highlight and address specific corruption risks created by Covid-19.

Domestically, it is essential to ensure that the UK's commitments to global leadership on tackling corruption do not become unintended collateral damage of the virus pandemic. Since the 2016 London Anti-Corruption Summit, and with the British political agenda dominated by Brexit in subsequent years, there has already been reduced high-level momentum behind the ongoing change required to ensure there is no place for corruption at home or abroad. As we enter the new decade with Britain's EU membership becoming material for the history books, the environment for exposing and preventing corruption is changing.

At the urging of TI-UK, the British Government introduced the landmark Bribery Act in 2010, legislation for world-leading levels of company ownership transparency in 2014, and major new illicit asset recovery powers in the 2017 Criminal Finances Act. We were able to achieve this impact as a result of earning a strong reputation founded on objective research, evidence-based policy making, and well-targeted public advocacy.

In 2020 as Britain leaves the European Union the foundations must be laid for the UK to become a beacon against corruption. The most public demonstration of this will be the presence or otherwise of anti-corruption as a theme in the agreements defining the UK's new trading relationships. Thereafter, the Government has the opportunity to make tackling illicit finance a theme of its plans for the UK chairing of the G7 in 2021.

At home, the challenge will be to get the Government to prioritise legislation for a 'Property Register' of who really owns the foreign companies that hold UK real estate assets. The emerging attention to the north of England by the ruling Conservative Party also presents the opportunity to draw attention to integrity arrangements in local government and in planning and economic development in parts of the country previously lacking scrutiny.

Nevertheless, there will be those who wish for Britain to act the role of a buccaneer off the coast of mainland Europe, de-regulating in a way which undermines the fight to stop the UK being awash with dirty money – the proceeds of crime and corruption. In some respects, the task ahead is to prevent backsliding against past standards and commitments.

This year, we will continue to promote integrity standards in UK sectors and institutions, improving the availability and use of open data to fight corruption, and influence public policy to secure these through system change.

We will work towards ending impunity by restricting the freedom of corrupt individuals and regimes, and the means available to them to launder and shelter the proceeds of corruption in the UK; ensuring there is nowhere to hide, no one to help and no getting away with

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it for those corrupt individuals who seek to use the UK as a safe haven.

In the corporate world there has already been a shift in leading businesses to fully consider the effectiveness of their approaches to preventing corruption rather than straightforward 'tick box compliance'. Corruption as a reputational risk is now being tested and quantified in terms of how much it hits the bottom line.

The trust in business narrative creates a window of opportunity for TI-UK to collaborate with multi-sectoral experts in the debate, to evidence and identify the links between corruption and wider environmental, social and governance issues in the UK and abroad. Over the coming year, our Business Integrity Programme will broaden and strengthen its position as a leading centre of independent advice and support to the private sector's defences against corruption. We will advocate in a nimble and targeted way to ensure the preservation of outstanding anti-bribery and corruption standards in corporations during and beyond a time of global crisis.

All too often, the consequences of corruption around the world can be felt in countries with declining political, civil and security situations; this directly affects the work of TI-UK's partner chapters in our Defence and Security Programme. Our aims to improve transparency and accountability in the defence sector/s in Mali, Nigeria, Tunisia and Lebanon will be highly dependent on the developing political and security developments in these countries over the coming year. These are also the countries where civic space may be further eroded by the nature of their government's Covid-19 response.

Globally, continued shifts in the geopolitical landscape will undoubtedly influence the community standard for corruption prevention in defence; for example in the area of deregulation or otherwise in major arms exporting countries. Against this backdrop, we will press ahead to establish standards of accountability and transparency in defence institutions; in turn building international stability through new norms for responsible powers. All of this will be firmly based in the impartial research findings of our Government Defence Integrity Index (GDI). We will generate new thinking on the tackling of corruption in post-conflict environments and implement tailored country strategies to achieve results in the most challenging of environments. We will intensify pressure on the arms industry to improve practices, changing the rules of the game to tackle the most deeply entrenched corrupt practices.

Meanwhile, 2020 will mark the 5-year milestone to the 2030 Sustainable Development Goals (SDGs). A UN High Level Meeting on Universal Health Coverage (UHC) in September 2019 committed to a follow-up meeting at the SDG midpoint in 2023. It is in this context that the concept

of health as a global common good (the 'right to health') is gaining currency with health related SDGs increasingly coalescing around the drive for Universal Health Coverage (UHC), the determination to 'leave no one behind' and how to 'invest more, invest better'. As a public health emergency, Covid-19 is likely to further accentuate this drive.

With global healthcare spending estimated to reach \$8 trillion in 2020, the headline statistic from TI's 2019 Ignored Pandemic publication (that recovering the over \$500 billion lost every year to corruption would more than offset the \$370 billion per year needed to achieve UHC) is particularly striking as transitioning economies come under pressure to optimise fiscal earnings, to cement the social contract, to prioritise health and to minimise leakage. But corruption remains a sensitive subject, including with some key stakeholders.

Over the coming year our health programme will continue to work with intent at the beginning, middle and end of the health value chain. 2020-21 represents the final year of our flagship Open Contracting for Health project. The project has progressed from more technical implementation of the open contracting data standard to how best to encourage procurement transparency in the health sector. TI HI's approach and focus area in each of the five pilot countries (Uganda, Zambia, Nepal, Kenya and South Africa) remains highly-contextualised: in Kenya we are working more at sub-national level; in Uganda we have worked with civil society organisations to introduce community monitoring of work; in South Africa we are engaging in the highly-politicised national debate around the country's proposed National Health Insurance scheme; in Zambia we are tracking procurement of externally-funded maternity waiting homes and in Nepal we are working with the Open Contracting Partnership to secure approval for online publication of national procurement data.

The health team will be looking at how their work on procurement transparency can be adapted to monitor country responses to Covid-19, both in the aforementioned countries and more broadly. With unparalleled pressure and resource being channelled into the development of Covid-19 treatments, diagnostics and vaccines, the team will also leverage their expertise and track-record in clinical trials transparency to advocate for the most open, public-interest approach. The health programme will actively monitor other key risk areas such as the procurement and medical devices, or the exploiting of undue influence to the detriment of the global response.

2020-21 Organisational Goals, Objectives and Key Performance Indicators (KPIs)

Our annual plan for 2020-21 presents an ambitious response to the environment described above; whilst ensuring our programmes meet their existing commitments and that our organisation is increasingly fit for this purpose.

The planning approach for 2020-21 differs from prior years in that each of the four programmes are fully integrated across the range of organisational goals and objectives. This reflects an identified need to increase programme cooperation, shared learning, policy development and operational efficiency. Whilst each programme retains distinct milestones and objectives, delivered with the requisite sector expertise, more common services will be placed at the disposal of each programme team in a uniform fashion.

The plan is organised around the three overarching goals and related objectives described below. A detailed set of Key Performance Indicators and their measurement/s has been developed to monitor progress against each objective over the course of the year.

Goal 1: Reinforce TI-UK's Anti-Corruption sector leadership through high quality programme design and delivery

Objectives and indicators under this goal describe, in broad terms, the principle planned activities and outputs of all programme areas for the coming year. Furthermore, the plan identifies overarching advocacy and external engagement priorities relevant to each programme, and which respond to the emerging environment described in the section above. There will be an additional set of activities designed to increase cross-programme learning and measurement of TI-UK's impact in the world; part of which will involve the creation of a new 'Evidence and Engagement' department.

Objective 1.1: Deliver identified milestones for four major programmes

Objective 1.2: Develop responsive, ambitious policy and advocacy positions for each programme

Objective 1.3: Drive understanding of 'what works' increase programme and movement cooperation

Goal 2: Amplify programme outcomes through mobilisation of further resources with impactful communications and advocacy

This goal area sets out our multi-faceted fundraising approach for the year; with a range of objectives designed to increase the financial resilience of each of our programmes and the organisation as a whole. This is set against an ever-changing fundraising landscape; with emerging patterns in individual giving and ever-evolving requirements from large institutional donors. Our objectives also seek a more ambitious external agenda with associated communication activities for the year; we will use compelling materials from both our global programmes and increased footprint of domestic work to 'make corruption matter' for a wider range of audiences.

Objective 2.1: Increase Unrestricted Income

Objective 2.2: Secure Sustainable Programme Funding

Objective 2.3: Increase External Profile and Influence

Goal 3: Strengthen the operational capacity and risk resilience of the organisation

Objectives in this area cover an ongoing programme of work to ensure TI-UK is working at or above sector best practice in everything from governance to cybersecurity. In particular, we will significantly invest in our people priorities, ensuring anyone who works for TI feels valued and appropriately rewarded; at the same time broadening our range of shared services to allow each specialist programme to fulfil their potential.

Objective 3.1: Launch a shared Programme Support Team; strengthen existing shared teams

Objective 3.2: Core systems and controls improved to deliver organisational resilience

Objective 3.3: Develop a resilient, nurturing and rewarding professional environment

Achievement of indicators in all goal areas is generally defined by a target for completion at the end of the identified planning quarter. Progress against indicators will be monitored and reported on a quarterly cycle; with each KPI given a RAG (Red-Amber-Green) rating following review at a quarterly management conference.

Financial Overview

Total income for the year is forecast to reach £5.6m-£6m which represents an increase of up to 30% over the prior year. Of the forecast income, up to 22% is anticipated to be unrestricted in nature, with the remainder received under restricted programme funding agreements. The forecast is driven, in particular, by anticipated growth in the number of private sector organisations partnering with the Business Integrity Programme, alongside new institutional donors to the global programmes affecting the final quarter of the financial year. Financial targets have been developed against the backdrop of economic uncertainty created by Covid-19; a range of possible scenarios will be closely monitored throughout the year.

Risk Management

TI-UK's top risks are reviewed alongside the process of creating the annual budget. It should be noted that there may be a risk in an individual programme that is significant for the entire organisation, an aggregation of similar risks from within the programmes that, when grouped together, represent a high organisational risk, or an organisational level risk that does not feature in any specific programme's section of the risk register. The Senior Management team regularly reviews the risk register, identifying appropriate mitigation steps and associated timelines. Nine of the top risk areas have been identified for the organisation at the time of writing.

- Employee turnover
- Safeguarding (ensuring uniform approach)
- Security (particularly for international programmes)
- Finance
- Funding (general)
- Programme funding cycles
- Legal risk
- Donor compliance
- (maintaining effective) External relationships
- An additional tenth risk related to Covid-19 was identified in February 2020 with dedicated plans in place to manage the risk and its impact on our people, cash flow and revenue generation, and programme delivery.

2021-2025 Strategy Development

A process to create a new 4-year strategy for the period 2021-2025 will be commissioned during the first quarter of this annual planning period. The new framework should be at a sufficient stage of completion to be presented at the TI-UK Annual General Meeting (AGM) in November 2020. The strategy development process will be organised in to four distinct phases:

1. Needs based research, sector analysis, stakeholder consultation (April-June)
2. Position development and drafting (July-August)
3. Testing and further consultation (September-October)
4. Final drafting, refinement and approvals (November-December)

The approach to the strategic plan will be inspired and informed by the wider work of the TI movement on a 'Vision 2030' process which aims to identify the overarching strategic goals of the movement for ratification at its Annual Members Meeting (AMM) in November 2020. A range of potential work areas and programmatic development have already been identified for examination by the TI-UK 2021-25 process:

- Testing TI's definition of corruption, abuse of entrusted power for personal (economic) gain against the emerging corruption risk environment in the UK,
- Deepening our work in the UK's devolved administrations and regional hubs,
- Designing a coherent approach to engagement with British Overseas Territories and Crown Dependencies,
- Securing an impactful future vision for the two global programmes operated by TI-UK,
- Examining TI-UK's potential contribution to tackling corruption in other global issues e.g. illicit finance, humanitarian & development aid, sport, technology,
- Envisaging new approaches to partnership working, retention and development of our 'network capital'.

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y which led to millions of
ng wrongly prescribed
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Mutual Extortion R
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Accounts Official Linked
Caught Taking Bribe, Ar



geon "mutilated hundreds
two decades"

The Airbus DPA has set another
global corruption cases and se



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"Many patient groups have deep ties
pharma but fail to disclose backing