

2025/26 ANNUAL PLAN

Board Approved 25 February 2025

INTRODUCTION

We are Transparency International UK.

We are part of the global Transparency International movement — a global movement working in over 100 countries to end the injustice of corruption.

Our Vision is a world in which government, business, civil society and the daily lives of people are free from corruption.

Our Mission is to stop corruption, promote integrity and, to that end, hold power to account for the common good.

We are independent, non-governmental, not-for-profit and work with like-minded partners across the world to end the injustice of corruption.

Since 1994, Transparency International UK has worked with the UK and devolved governments, parliamentarians, civil society and the business community to play a critical role in tackling corruption at home, addressing the UK's global corruption footprint, and helping multinational companies prevent corruption by guiding them towards robust anti-corruption and integrity measures in their operations and sustainability strategies. We are also host to two major Transparency International global programmes (Defence and Security, and Global Health) aimed at tackling corruption in those sectors on behalf of the wider Transparency International coalition.

We deliver our mission through impartial, evidence-based research, the design of solutions and standards and by educating and informing decision-makers, the media and public. We drive change through constructive advocacy and by providing support and expertise to others aligned to our cause.

This has resulted in significant progress in stopping corruption, promoting integrity and holding power to account.

In 2022 and 2023 we secured two landmark **laws** to tackle dirty money and the proceeds of corruption in the UK economy, which followed a seven-year campaign underpinned by rigorous research. New rules governing MPs' second jobs and improved transparency over their financial interests were introduced in 2023, stopping Westminster politicians from accepting cash for lobbying services in response to our expert evidence and ongoing campaign to increase integrity in politics

Most recently, following the general election in the UK:

- The new Foreign, Commonwealth & Development Affairs
 Secretary has launched a campaign to tackle dirty money
 into and through the UK, beginning with a raft of sanctions
 against high profile kleptocrats and their associates. He has
 agreed with representatives of British Overseas Territories
 fresh commitments to improve access to information on their
 company registries.
- The Prime Minister has published a new ministerial code and given their adviser on ministerial interests¹ the independence to commence his own investigations into government ministers.
 He has also appointed Baroness Margaret Hodge to be the government's Anti-Corruption Champion.
- A change to the Code of Conduct for MPs has tightened the rules on their outside earnings, specifically as consultants and advisors, with further reforms on the agenda of a new.
 'Modernisation Committee'.
- The UK COVID-19 Inquiry has opened a module of hearings into public procurement during the pandemic, for which the UK Anti-Corruption Coalition is a core participant. The Chancellor of the Exchequer has also appointed a COVID Counter-Fraud Commissioner² to hold contractors to account and recoup public money lost in pandemic-related fraud.
- We conducted an authoritative investigation into public contracts issued by the UK government during the COVID-19 pandemic with 135 contracts representing one third or £15.3 billion of public funds carrying a high risk of corruption.
- Our rigorous benchmarking tools have helped FTSE 100 companies improve their anti-corruption programmes, while our anti-bribery guidance for businesses is used nearly 3,000 times a year.

Internationally, governments and civil society rely on our unique **Government Defence Integrity Index**³ (GDI) to work towards promoting transparent and accountable defence institutions which are resilient to corruption. Our global movement's expertise has also been key to building consensus at the UN on the need for tighter regulations of private military and security companies. Our partnerships with Transparency International chapters in West Africa and Tunisia have advanced efforts to build integrity in their defence and security sectors.

Transparency and accountability has been integral to stronger integrity within the global health sector and ensuring health for all. With **partners**, we have been successful in getting transparency and accountability provisions built into the upcoming 'Pandemic Accord⁴' and securing recognition in the UN high-level meeting resolution on universal health coverage (UHC) that corruption represents a barrier to its attainment.

The world has changed dramatically in the four years since we launched the first phase of our strategy. Our achievements so far in tackling corruption will be the foundation for our work in the next phase to 2027.

This Annual Plan is the second as we continue to implement our refreshed **strategy**, 'Stopping Corruption – Promoting Integrity'.

¹ UK Government, Independent Adviser on Ministerial Standards, PUBLISHED on GOV.UK

² UK Government, Covid Counter-Fraud Commissioner, Published on GOV.UK

³ A comprehensive assessment of the quality of institutional controls to manage the risk of corruption across 77 areas, with the goal of producing a detailed assessment of the integrity of national defence institutions.

⁴ World Health Organization, Pandemic prevention, preparedness and response accord, Published on WHO.INT

2025-26 CONTEXT

2024 saw over two billion people around the world having the chance to vote with citizens seeking to hold power to account. Millions more live in places suffering from war and violence inflicted on them by unaccountable leaders and armed groups. This year, the consequences of those events will become clear, both in countries where the choices of citizens were thwarted and in those where they have brought major changes to the agenda of governments.

The change of government in the United States in particular challenges previous norms of multilateralism and shared institutional defences against corruption, at the same time as withdrawing financial contributions deployed internationally in critical contexts. In the private sector, investors and business are being scrutinised for longer term environmental and social impact whilst facing short term economic headwinds and uncertainty not least as a result of the geopolitics between the world's largest economies and trade blocs.

In Britain, following an election that reminded politicians of the essential currency of trust we are seeing early signs of a determination to refocus on essential integrity measures. Whether this will be effective in turning around the slump in the **global Corruption Perceptions Index** rating for the UK remains to be seen. Determined actions to learn from the past including the response to the COVID-19 pandemic would help build confidence that the protection of public resources not only provides opportunities for economic growth but importantly allow business and government to thrive.

Countering kleptocracy and confronting the UK's reputation as a hub of illicit financial flows is now a personal priority of the country's Foreign Secretary. Britain's offshore financial centres have agreed to new deadlines for introducing legitimate access to their company registries, but as ever this can only truly be evaluated in terms of what is actually delivered. This year will be key for the implementation of recently passed laws to strengthen the UK company register at Companies House, and also for a long overdue decision to grapple with the supervision of professional service providers in meeting their obligations to help defend the economy from dirty money serving the criminals, corrupt foreign officials and their associates.

Globally, health services remain under sustained pressure to perform ever more with limited resources. Health worker shortages afflict many health systems, in both high- and low-income economies. In emerging economies the growing dual burden of disease is putting increased financial pressures on health systems; with these pressures come corruption opportunities.

With the text of the 'Pandemic Accord' still not finalised, pandemic preparedness has slipped down the international agenda as countries grapple with competing challenges. Changes in US national leadership creates new uncertainties for the sector at large, and with it the work of the domestic agencies on tackling corruption in the health sector.

Amidst this uncertainty, and competing pressures, concerted efforts are being made to increase the sustainability of domestic financing for health. The Lusaka Agenda[§], agreed upon in 2024 calls for countries to increase domestic financing, and improve public financial management systems in order to ensure that value for money is achieved. This renewed focus offers opportunities to build more transparent financial management systems in the sector and embed anti-corruption safeguards.

The world stands at a critical crossroads. The 2024 Global Peace Index® highlights a troubling rise in militarisation across 108 countries, alongside 56 active conflicts – the highest number since World War II. These conflicts are increasingly international, with 92 countries involved in cross-border hostilities. Simultaneously, global military expenditure soared to an unprecedented \$2.443 trillion in 2023, as reported by the Stockholm International Peace Research Institute (SIPRI).

Corruption and insecurity are deeply intertwined, and the pursuit of peace cannot be decoupled from addressing corruption in defence. Russia's ongoing war in Ukraine, recent coups in West Africa, and the Israel-Palestine conflict underscore how record-

⁵ World Health Organization, Roadmap for Implementation of the Lusaka Agenda in Africa, Published on IRIS.WHO.INT

⁶ Institute for Economics & Peace, GPI-2024-web.pdf, Published on ECONOMICSANDPEACE.ORG

breaking military spending and high-value global arms deals fuel instability. In Asia, rising tensions between Taiwan and China, North Korea's provocative military activities, and its reported support for Russia's war in Ukraine also further highlight the urgency and strategic importance for democratic countries in the region to strengthen their governance standards in defence as a strong deterrent to potential adversaries seeking to undermine the credibility of their national defence capabilities and regional stability.

Addressing corruption in defence demands a comprehensive approach - strengthening governance, enhancing transparency, and fostering accountability. Yet, no existing forum adequately addresses the nexus of corruption, peace, and security. This gap presents an opportunity for TI-DS to lead a coordinated effort, bringing together diverse stakeholders to champion transparency, promote accountability, and combat corruption in defence and security.

Meanwhile, civic freedoms are under assault in much of the world. According to CIVICUS' 2024 People Power Under Attack report⁷, civil society faces significant repression in 116 of 198 countries and territories. In this increasingly challenging environment, we recognise the critical role of our Global Programme and are committed to fostering stronger collaboration across the Transparency International movement. By empowering, enabling, and supporting national chapters, we aim to amplify their advocacy efforts and drive impactful reforms at national, regional, and global levels to combat corruption

⁷ CIVICUS, Global Findings 2024, Published on MONITOR.CIVICUS.ORG

PROGRAMME GOALS AND PRIORITY WORKSTREAMS

Our overall strategy and annual plan are guided by the objectives of the global Transparency International movement. Our objectives in this annual plan, below, have been selected from those movement-wide priorities:

- 1. Stop the Flow of Dirty Money
- 2. Protect public resources
- 3. Secure Integrity in Politics
- 4. Drive Integrity in Business

To make progress against these objectives, our UK programmes will continue to address both corruption in the UK and the UK's contribution to corruption around the world. Priorities for 2025-26 include:

- It is vital that recent economic crime laws addressing money laundering and abuse of UK shell companies are implemented effectively, with the remaining loopholes closed. We will also push for ambitious reform to the supervision of anti-money laundering measures in high-risk sectors, transparency in Britain's Overseas Territories and accountable asset return.
- The new government's English Devolution White Paper⁸ provides an opportunity to promote stronger safeguards over the use of public resources at the subnational level. We will continue to explore the extent to which integrity issues, and undue influence arising from secretive lobbying in particular, connect with salient issues of the moment such as the climate, housing and healthcare.
- We recognise the value in a multistakeholder approach to change and will proactively mobilise civil society coalitions and explore how good actors in the private sector can contribute to our mission. For example, through sharing intelligence, undertaking joint advocacy or through bringing investigative assets to the table. This is particularly important given recent executive decisions by the new Trump administration in the US signalling emerging shifts in national policy (bilateral aid, government funded research, proposed domestic policy changes), and their participation in multilateral institutions like the World Health Organization (WHO) and others.

• We will continue to support companies and investors in their efforts to promote integrity in business. New European sustainability reporting rules[®] amplify our call for meaningful and accurate corporate anti-corruption disclosures while evolving due diligence requirements¹⁰ are an opportunity for companies to leverage and adapt their anti-corruption system. The new 'failure to prevent fraud' offence is similarly an opportunity for companies to build on their existing anti-corruption and integrity measures. We will continue to strengthen our business integrity offer and build networks with companies, investors and multistakeholder groups to increase our outreach and impact.

Meanwhile, our global teams will continue to build on successful policy advancements and partnerships with Transparency International chapters around the world as well as governments, the private sector, think tanks and multilateral institutions, as we strengthen our global centres of excellence on corruption in Global Health and Defence and Security. Through these partnerships, we will focus on the following thematic priorities:

In Global Health:

- We will launch a revised, more comprehensive version of the Artificial Intelligence media monitoring tool (AIMON), which will capture reporting on corruption in health care around the world. Reports will be publicly available, and we will use information stemming from the tool to work with chapters and partners to support them in engaging to stop corruption in their health systems
- Corruption in the health sector remains widely unquantified.
 Over the coming year, we will work with colleagues in Kenya (and/or other TI Chapters) to better quantify the costs of corruption. We will work with partners to model the impact on health outcomes along with economic losses.
- The long-anticipated Lancet Commission on corruption in health (launched in November 2023) continues its work and TI Global Health serves as a core partner in the development and delivery of ongoing global analysis and reporting. Alongside, we will utilise findings from the recently concluded U4 Anti-Corruption Resource Centre/TI report on donor engagement

⁹ European Commission, Corporate sustainability reporting, Published on FINANCE. EC.EUROPA.EU

¹⁰ European Commission, EU Simplification Omnibus Package, Published on COMMISSION.EUROPA.EU

⁸ UK Government, English Devolution White Paper, Published on GOV.UK

- in corruption in the health sector to convene donors, and multilateral organisations in order to identify new opportunities for them to engage on the issue.
- In conjunction with chapters in Southern Africa, we will utilise results and learnings from work on addressing corruption at the point of service delivery to engage with and get action from African regional health bodies and multilateral organisations to ensure that corruption in health services across the region does not pose a barrier to accessing primary care.

In Defence and Security:

- We remain steadfast in our commitment to delivering impactful work under our 2024-26 Strategy, informed by key insights and learnings from the evaluation of our three-year project funded by the Ministry of Foreign Affairs of the Netherlands.
- A core focus will be leveraging our robust evidence base to drive meaningful advocacy at global, regional, and national levels. Building on the progress achieved so far, we will strategically apply an evidence-driven approach to ignite change, promote reforms, and strengthen policy environments. Central to this effort is addressing corruption as a critical threat to peace and security, whist further promoting access to information to enhance integrity, transparency, and accountability across the defence and security sectors.
- Our work on Security Sector Reform will continue to grow, focusing on the EU and UN while expanding efforts to the African Union. Advocacy will be shaped by insights from our Fragile and Conflict-Affected States briefs, alongside promoting and expanding the Government Defence Integrity Index (GDI) 2025 waves. A gender perspective will be fully integrated into all aspects of our work, ensuring inclusivity and equity.
- Additionally, we will build on the successes of chapter-led initiatives in Tunisia, Niger and Nigeria, continuing dedicated efforts to foster civic engagement and strengthen oversight within the defence and security sectors. Globally, we will collaborate closely with chapters across the movement, especially those in the Global Network, to facilitate informationsharing, capture lessons learned, and coordinate advocacy efforts. This will enhance civil society's ability to engage with and oversee the defence and security sectors, driving systemic change and building trust.

ORGANISATIONAL PRIORITIES

In addition to our Programme Objectives, we have three Organisational Priorities in our strategy to ensure the resilience and fitness of purpose of our organisation:

- 1. Sustain our contribution to the Transparency International movement
- Deliver cost effective, sustainable funding and increased supporter engagement
- 3. Provide a workplace where those we attract and retain can thrive and everyone's contribution is valued, ideas are heard, and learning is supported

During 2025-26, we will prioritise the following:

- Continuing to work with colleagues in the Transparency International Secretariat in Berlin to strengthen the movementwide value and leadership of Transparency International UK's accredited international programmes.
- Sustaining our high level of influential media exposure and relationships with a focus on strategically important engagement with target audiences for all programmes, building the profile of our global programmes within the movement and maintaining Transparency International UK's profile as the leading voice in the fight against corruption in the country via our website and other communication channels.
- Continuing to diversify and strengthen our multi-year programme income, securing at least £1m of new funding commitments in year, and up to £3m for the following year; whilst seeking to strengthen unrestricted income and support from our members and stakeholders.
- Continuing to promote and develop a high trust culture
 where new strategic opportunities and adaptability are key to
 delivering a collaborative, engaging and learning culture with
 a focus on knowledge sharing and performance feedback
 throughout the employment journey. All colleagues will have
 access to the tools that support a Speak Up culture.

FINANCIAL OVERVIEW

Total income budgeted for the year is £4.6m (restricted cash that had been received and not spent at the start of the year (£2.2m) and new revenue to be generated (£2.4m)). This is comparable with £5.5m in the prior year with the decrease relating to renewed funding for our defence and security programme confirmed in February 2025. Where fundraising targets are exceeded, additional funding will be available for programme areas, however in light of the challenging development and business sector funding demands a conservative budget forecast is in place. £684,000 (PY £722,000) is anticipated to be unrestricted in nature, with the remainder received under restricted programme-funding agreements. Of the new revenue to be generated, 70 per cent has been secured as we enter the financial year (previous year 41 per cent) with negotiations for the remaining funds well progressed with existing donors. Planned programme expenditure (£3.6m) is broadly aligned with prior years and with our international programmes supporting the wider policy and practice work of the movement. Seven per cent of funding is allocated to grants to other chapters and partners.

RISK MANAGEMENT

Transparency International 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 Leadership team regularly review the risk register, identifying appropriate mitigation steps and associated timelines.

The top organisational risks at present are:

- aggressive legal litigation
- demonstrating with evidence the impact of our work to external stakeholders
- employee turnover/changing expectations/ career progression
- funding/finance (particularly funding shared services from restricted grant recoveries and unrestricted)/programme funding cycles
- safeguarding (duty to protect from harm) norms, values, attitudes & behaviours including partners we fund
- security of our people and data (considering the conflict in Ukraine/Russian and our work on dirty money)
- strategy delivery ambition.

ANNEX: 2025-26 ANNUAL BUDGET

2025-26 Income and Expenditure Budget

	2024-25			2025-26			
	Restricted £	Unrestricted £	Total £	Restricted £	Unrestricted £	Total £	
Income (receivable)							
UK Anti-Corruption / Business Integrity	690,182	672,000	1,362,182	1,055,328	644,000	1,699,328	
GTN: Defence & Security	1,975,085	-	1,975,085	474,121	-	474,121	
GTN: Global Health	126,828	-	126,828	182,698	-	182,698	
Unrestricted Fundraising / Deposit Interest	-	50,000	50,000	-	40,000	40,000	
Total Incoming Resources	2,792,094	722,000	3,514,094	1,712,147	684,000	2,396,147	
Expenditure							
Project Activities	443,860	20,000	463,860	494,347	32,836	527,183	
Project Employee / Consultant Costs	1,977,804	565,516	2,543,320	1,585,740	776,221	2,361,961	
Grants Issued to TI Chapters / Partners	255,978	-	255,978	250,254	-	250,254	
Support Costs	646,608	(646,608)	-	563,104	(563,104)	-	
People, IT, Governance, Finance & Admin	-	566,053	566,053	-	421,358	421,358	
Total Resources Expended	3,324,249	504,960	3,829,210	2,893,445	667,312	3,560,757	
Surplus / (Deficit)	(532,155)	217,040	(315,116)	(1,181,298)	16,688	(1,164,610)	
Shortfall in restricted programmes - Project employees	117,946	(117,946)	-	-	-	-	
Net Surplus / (Deficit)	(414,209)	99,094	(315,116)	(1,181,298)	16,888	(1,164,610)	
Funds brought forward 1 April (forecast)	1,819,014	470,902	2,289,916	1,644,802	400,341	2,228,069	
Funds carried forward 31 March	1,404,805	569,996	1,974,800	463,503	417,030	880,533	

	2024-25		2025-26	
Secured	1,428k	41%	1,689k	70%
Unsecured	2,086k	59%	797k	30%
Total	3,514k		2,396k	

- The budgeted unrestricted surplus is £17k (compared with a budgeted surplus in the prior year of £99k.
- The income budget is based on the revenue pipeline that indicates 70 per cent is secured. Of this, restricted funds are 67 per cent secured whilst the unrestricted is 73 per cent secured. Unsecured restricted funds are predominantly for UK Programmes, of which the majority are expected to be confirmed before the start of the financial year.
- 71 per cent of funding is allocated directly to project activities including grants to other Chapters and Partners (7 per cent).

Restricted Funding for Programme Investment

£'000	20/19 Actual	20/21 Actual	21/22 Actual	22/23 Actual	23/24 Actual	24/25 Budget	25/26 Budget
Income							
UK	1,812	828	1,089	1,795	1,229	690	1,055
Defence & Security	3,634	995	1,479	2,219	807	1,975	474
Global Health	1,033	808	1,055	377	382	127	183
Total Income	6,479	2,631	3,623	4,391	2,418	2,792	1,712
Expenditure							
UK	1,225	973	1,250	1,193	1,853	1,316	1,422
Defence & Security	2,666	1,939	767	1,464	2,076	1,832	1,264
Global Health	1,086	801	833	620	387	176	207
Total Expenditure	4,977	3,713	2,850	3,277	4,316	3,324	2,893
Year End Balances							
UK	836	691	783	1,554	759	496	453
Defence & Security	1,073	129	925	1,659	511	913	7
Global Health	2	9	165	9	10	(4)	4

• Programme investment has varied over the seven-year period with different programmes reflecting the current stage of their strategic priorities and available funding. With no UK FCDO funding from 2021-22 onwards the international programmes have had to adapt operational plans with new government support from Sweden and Canada funding the Global Health priorities and the Netherlands funding significant parts of the Defence and Security programme along with US Foundations and UN agencies. The UK Programme from 2022 includes funding to support the work of the UK Anti-corruption Coalition.

Headcount

The budget is based on the following headcount assumptions with the following split of employees by grades:

Headcount by Grade	Grades	2024-25 Per Cent of Roles	2025-26 Per Cent of Roles
Chief Executive/ Senior Leadership Team	6a-7	10%	10%
Programme Directors / Senior Managers / Heads of Programmes	5-6b	26%	33%
Programme Managerial Roles	4	24%	20%
Programme Delivery Roles	1-3	40%	38%
		100%	100%

Budgeted Headcount by area (FTE)	2024-25	2025-26
UK	14.9	18.1
International	16	11
Shared Services	9.6	6.5
Total	40.5	35.6

Capital Expenditure

No capital expenditure is currently planned within the budget for 2025-26.

Key Risks to the Budget

The key risks in relation to the 2025-26 budget are:

- (i) the inability to secure **funding to ensure the continuity of programmes** as they are current resourced into 2026-27 given the renewal periods from multilateral and foundation donors is moving away from multi-year awards. This has risks to both supporting on-going salary costs and inability to recharge overheads. There are some opportunities to deploy existing resources to other programmes to help mitigate this risk.
- (ii) **private sector revenue** that cannot be delivered in the timescales envisaged or with effort diverted into future growth. Delays in evaluation of current Thought Leadership research could then impact future year's capacity to generate new research revenue streams. The overall economic uncertainty impacting business gloabally is impacting levels of discretionary spend.
- (iii) securing **operational capacity** to deliver all programme areas/ support functions given employee retention risks.
- (iv) ensuring **fundraising/ partnership development resources** are aligned to opportunities that will deliver longer term multi-year sustainable funding to programmes at the same time as ensuring access to unrestricted funding remains adequate and predictable in order to provide organisational resilience.

Three Year Funding

The restricted funding for programmes beyond the next financial year highlights a need for a minimum of £3.58m (2026-27) and £3.63m (2027-28) respectively to be raised to maintain the current level of organisational capacity. Given the timelines to secure that funding and the time commitment that bid development can take a Strategy Fundraising Taskforce overseen by the Chief Executive is in place to ensure the current fundraising pipeline prioritises options most likely to become secured by 2026-27.