

FROM PRACTICE TO IMPACT

**Taking stock of progress in the implementation
of Anti-Corruption Summit commitments**

Transparency International is the world's leading non-governmental anti-corruption organisation. With more than 100 chapters worldwide, Transparency International has extensive global expertise and understanding of corruption.

Transparency International UK (TI-UK) is the UK chapter of Transparency International. We raise awareness about corruption; advocate legal and regulatory reform at national and international levels; design practical tools for institutions, individuals and companies wishing to combat corruption; and act as a leading centre of anti-corruption expertise in the UK.

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EXECUTIVE SUMMARY

Our journey since the Summit

The 2016 Anti-Corruption Summit was undoubtedly a landmark in global recognition that tackling corruption matters. It was a unique opportunity to develop plans of action to effectively address this issue, acknowledging that the real victims of corruption are the world's citizens. It created a platform for 43 governments to sign up to ambitious targets¹.

The Summit covered a wide array of topics, which presented opportunities both for success and failure. However, after an initial analysis by Transparency International UK, more than half of the 648 commitments – 56 per cent – were identified as “concrete” promises². A third – 33 per cent – were “new”, that is, generated by the Summit³. And about a third – 30 per cent – were “ambitious”⁴.

Fora of this sort tend to lose relevance once another event takes hold of the international agenda⁵. Governments might also use these events as an opportunity to garner support, without an explicit ambition to follow through on their promises. The lack of a formal monitoring process on the back of this particular summit could have jeopardised the potential achievements to be gained from what governments had committed to attain.

For this reason, Transparency International's global movement embarked on a journey of tracking the progress of anti-corruption promises made at the Summit through Transparency International UK's Promise to Practice Project. A key element of our initiative to foster this agenda was our grassroots advocacy approach to build pressure for the implementation of commitments locally, in Afghanistan, Jordan, South Africa, Sri Lanka and the United Kingdom. Additionally, we set out to develop local monitoring platforms across these countries and Mexico, Nigeria and Kenya, and to embed these promises in other overlapping mechanisms.

Four years on since the 2016 Anti-Corruption Summit, we take stock of the progress achieved through this initiative.

Trends of progress and the impact of the COVID-19 pandemic

The results from the latest iteration of the Global Anti-Corruption Pledge Tracker show that over three quarters – 78 per cent – of commitments that we track are now underway, ongoing or complete⁶. While this means that reforms have started and are ongoing (there has been some kind of progress in each of these commitments over the past six months), there is still a long way to go. This is not only due to the fact that implementation is a long, often formal process, but also because some commitments will remain ‘ongoing’ over time – implementation in these cases requires continuous refinement and development.

The COVID-19 pandemic has further slowed progress towards reform. This crisis has shown how corruption risks are exacerbated with the acute need for a rapid response in procuring supplies, and speed reacting to developments in the health arena and also economic interventions and social policy. However, the pandemic has also highlighted the importance of implementing these commitments to be able to track corruption risks and protect those who are speaking up.

Public Procurement and Open Data

One of the main concerns identified during the pandemic has been around the award of public contracts. This issue is currently in the spotlight, subject to many investigations and close oversight by civil society organisations and citizens around the world. Whilst 82 per cent of commitments on open procurement – key to spot and prevent corruption in public spending – are now underway, ongoing or complete, more needs to be done to ensure that these are achieved.

Even before the pandemic, the UN Office of Drugs and Crime warned that up to 25 per cent of a public contract's value may be lost to corruption⁷. This worsens during crises: procurement is expedited using emergency processes. Whilst this speeds up the response to increased demand for supplies, it has come at the cost of transparency, accountability and increased corruption risk. Regulatory changes result in high use of single bidding, short advertisement periods, and a reduction in monitoring for

¹ www.transparency.org.uk/one-year-what-s-happened-2016-anti-corruption-summit

² Transparency International UK, 2016, “Was it Worth it?” Assessing government promises at the 2016 Anti-Corruption Summit, p.3.

³ Ibid

⁴ Ibid

⁵ www.transparency.org.uk/publications/accountability-in-action/

⁶ 131 out of 169 commitments that we have evaluated as part of the May-Oct 2020 iteration are underway, ongoing or complete.

⁷ www.unodc.org/documents/corruption/Publications/2013/Guidebook_on_anti-corruption_in_public_procurement_and_the_management_of_public_finances.pdf

recognised red flags of corruption risks. Thus, we have seen issues such as: suppliers of COVID devices showing that they have no background in delivering that service; shell companies supplying products and services on an emergency basis; and conflict of interests or nepotistic connections in the awarding of contracts.

The implementation of commitments made on open contracting - for example, the creation or improvement of e-procurement systems - help to monitor unusual contracts.

Several countries made commitments at the Summit to protect from misuse of public funds by continuing to make public procurement via e-platforms open by default to all. Progress on these commitments has helped to increase transparency on procurement. Online tools can be used to research suppliers and monitor prices, as well as understand who is benefitting from these transactions.

Open data can also empower those citizens who are monitoring transactions and new businesses that wish to become suppliers. Even if emergency procurement is in place, the data remains traceable and transparent. For countries that have implemented open data standards for their engagement with citizens, this has served to inform and justify trust in public policies.

Beneficial Ownership

There has been a massive global effort to respond to the COVID-19 crisis. However, it is also important to know who stands to profit. There are major corruption risks: decision makers with conflicts of interest, abuse of the 'revolving door', and entities linked to organised crime hiding behind shell companies being awarded business continuity support or public contracts for emergency supplies.

In this report, we see that progress has taken place to make it harder to hide the proceeds of corruption through the implementation of beneficial ownership transparency promises – 71 per cent of these are underway, ongoing or complete. However, implementation is taking place at a slow pace in many countries.

Being able to check the beneficial ownership information of the companies being paid for supplies and receiving money from the government is crucial to understand who has benefitted from emergency procurement contracts.

The ability to check public registers to understand who owns companies and eventually identify conflicts of interest has been

crucial for journalists and civil society advocates to investigate dubious contracts during the pandemic.

Whistleblowing

Over the past nine months, more than 1,800 people contacted Transparency International Advocacy and Legal Advice Centres across the world to report corruption and seek support for issues related to COVID-19⁸. There have also been reports of bribery, embezzlement, mismanagement of funds, diversion of resources, lack of competition, price gouging, contracts being awarded to organised criminals and collusion between public and private sectors, in media outlets around the globe. Behind these reports, there are often individuals who are putting their jobs, families, and lives on the line to expose these stories.

As of October 2020, 91 per cent of commitments on whistleblowing are *underway, ongoing or complete*⁹. Whilst having a legal framework for whistleblower protection, which most countries committed to at the Summit, is the starting point, this does not automatically entail implementation and enforcement of the law. Transparency International chapters around the world report that retaliation against whistleblowers and victims of corruption continues to take place on a large scale.

Whistleblowing protections are key to protect the vital work of those who expose wrongdoing, and countries that have implemented legislation on this establish increased safeguards¹⁰. For these to be effective, proper enforcement and oversight of passed legislation needs to be in place.

Conclusions

Whatever a country's baseline was before the pandemic it is likely to be weaker now, unless reforms of legislation, enforcement and oversight have been sustained and encouraged.

Since the Summit, the process of pledge tracking has been used as an advocacy resource to kick start several national reform processes, serving as the initial point for collaboration between governments and local civil society organisations in the implementation of commitments. The global pledge tracking tool formalised the process of monitoring government's actions, establishing concrete ways for civil society to act as a watchdog. This has fostered accountability on a global scale, which provides more leverage for local advocates than national scrutiny alone as more eyes are watching.

Pledge tracking is a key tool to understand what had been achieved prior to this crisis, and what is left to do.

⁸ www.transparency.org/en/citizens-report-covid-19-corruption

⁹ This means that out of 11 commitments, 10 are in play and 1 is out of play.

¹⁰ www.transparency.org/en/blog/protection-of-whistleblowers-vital-during-covid-19

6. TRANSPARENCY INTERNATIONAL – FROM PRACTICE TO IMPACT

Beyond pledge tracking, intertwining promises with other global and national processes, such as the Open Government Partnership's National Action Plans or National Anti-Corruption Strategies, can strengthen implementation. Keeping these topics on the global agenda generates pressure on individual countries to adhere to certain international standards to follow these trends or assume a position of leadership within their region.

Finally, and critically: civil society's local advocacy has complemented these other processes through a flexible, iterative and impactful approach. The flexibility of local advocacy allows for adaptation to the needs of the specific context, from the usual role of holding governments to account for their actions, to improving the quality of implementation. Local partners have worked to fill knowledge gaps in the enactment of more technical and complex legislation, by involving groups in society that have been traditionally left out of these processes, or by setting action plans and boundaries for reform when attention has faded. Local advocacy strategies have been crucial to set a clear path of action in each country, ensuring that grand pledges become attainable goals.

Now that four years have passed since the start of this journey, we have compiled the progress achieved and challenges encountered in reform across monitored countries, and gathered lessons learned on effective collaboration and implementation of anti-corruption commitments. Without this work, many promises would have become dormant, but there is still a lot to be done to bring transparency and accountability to prevent corruption worldwide, especially given the impact of the pandemic.

It is now clear: implementation of anti-corruption commitments requires governments to be held to account at home and in global fora. Civil society has a critical and constructive role to play in national contexts, which can help ensure promises to fight corruption are kept.

ASSESSING PROGRESS

BACKGROUND

Transparency International UK works with Transparency International chapters and national partners across the world to monitor government progress on the commitments made at the 2016 Anti-Corruption Summit. This global pledge tracking process has evolved over the course of the project and seeks to offer a snapshot of clear and concise information on how each government has progressed on implementing its commitments.

Initial classification

Before embarking on this monitoring initiative, Transparency International UK assessed the 648 commitments made at the Summit and classified them as per the following categories:¹¹

Concrete – those commitments with measurable language such as ‘we commit to join’, or ‘we commit to establish’. **Somewhat concrete** commitments include language that signals intent to make progress without there being an easily measurable outcome. This includes phrases such as ‘we commit to explore’ or ‘we support’. Commitments identified as **‘other’** are those indicating existing actions that can be monitored, such as ‘we will continue’ or ‘we are in the final stage of’.

Transparency International chapters and partners also assessed whether commitments were **New** and/or **Ambitious**.

New – commitments generated at the Anti-Corruption Summit. **Somewhat New** commitments are those that are facilitated or reinvigorated by the Summit but that had been previously discussed. **Not new** commitments were already in place prior to the Summit. **Other** commitments refer to pledges that were already on the table but it is unclear when the commitment was made official.

Ambitious – National civil society organisations took national context into consideration when assessing the level of ambition. For this reason, similar commitments in different countries receive a different assessment. Where we were unable to receive a response from civil society on a certain national issue in the available time, the commitment is marked as **‘no information available’**.

The Global Anti-Corruption Pledge Tracker

Currently, the Global Anti-Corruption Pledge Tracker website has data on progress made on 187 commitments by 21 governments¹². Each commitment includes its initial classification depending on how concrete, new or ambitious it was.

The tracker focuses on six themes:

- Asset Recovery
- Beneficial Ownership Transparency
- Law Enforcement
- Open Data
- Public Procurement
- Whistleblower and Civil Society Space Protection

Our focus on these six themes allows for depth in our assessments. From November 2019 onwards, we have also incorporated “uncategorised commitments”, pledges made by countries that are not part of these six themes, but that Transparency International chapters were eager to monitor.

There are fewer governments included in the current sample. In our previous reports we collected data across 27 countries and six international organisations; in this iteration we are concentrating on 169 commitments from 19 countries¹³. Iterations are compiled with the support of Transparency International chapters’ research and submissions to the government across the globe. Capacity and resources vary across chapters and years, resulting in more or fewer contributions at each point in time. This explains the varying number of countries included in the sample.

All information and data mentioned in this report can be found online, on the Global Anti-Corruption Pledge Tracker website:

www.anticorruptionpledgetracker.com

The process

The assessment of each country’s commitments has been carried out by the relevant Transparency International chapter or partner based on requests for information sent to the government and backed up by independent research, to ensure contextual knowledge and expertise. Over the years, we have added more categories of progress to allow for nuance in explaining the many complex stages on the way

¹¹ For more information on this process, please refer to: Transparency International UK, 2016, “Was it Worth it?” Assessing government promises at the 2016 Anti-Corruption Summit.

¹² The following countries have been assessed and incorporated into the website for the last iteration: Afghanistan, Australia, Brazil, Bulgaria, France, Georgia, Ghana, Indonesia, Jordan, Kenya, Mexico, New Zealand, Nigeria, Russia, South Korea, Spain, Sri Lanka, Switzerland, Trinidad and Tobago, Ukraine, United Kingdom. Trinidad and Tobago and Switzerland have not been part of the latest iteration.

¹³ For the May-October 2020 iteration, the following countries have been assessed: Afghanistan, Australia, Brazil, Bulgaria, France, Georgia, Ghana, Indonesia, Jordan, Kenya, Mexico, New Zealand, Nigeria, Russia, South Korea, Spain, Sri Lanka, UK, and Ukraine.

to successful implementation. Transparency International chapters and national partners are asked to categorise each commitment according to the following definitions:

Complete - This commitment has an end date and there is evidence it has been completed.

Ongoing - This commitment has no defined end date and there is evidence that activity has started and that there has been progress over the past six months.

Underway - This commitment has an end date and there is evidence that activity has started and continues, but has not been completed.

No Data - There is no data on how this commitment is progressing.

Inactive - There is no evidence that activity has taken place, or there is evidence that there has been no progress on this commitment.

Overdue - There is evidence that this commitment has not been completed by the stipulated deadline.

Dropped - There is evidence that this commitment has been dropped by the government.

After the categorisation and public evidence finding process, Transparency International chapters and partners also reach out to their respective governments to seek further evidence or clarification on the progress of commitments.

After this evaluation, a review process takes place at Transparency International UK, where evidence is checked by a reviewer and later examined by a peer reviewer. This method seeks to bring consistency to the analysis, but ultimately the final assessment is owned by the civil society partner in-country, which is better placed to understand the context and subtleties of the process. For this reason, comparison across country or commitment progress is discouraged.

In order to allow for an aggregated and simpler understanding of the data, we sometimes use the following categorisations in the report:

In Play – refers to ‘active’ commitments: those marked as Complete, Ongoing or Underway, which means they have seen progress over the past six months.

Out of Play – refers to ‘inactive’ commitments: those marked as No Data, Inactive, Overdue or Dropped, which means they have not seen any progress over the past six months or more.

Limitations

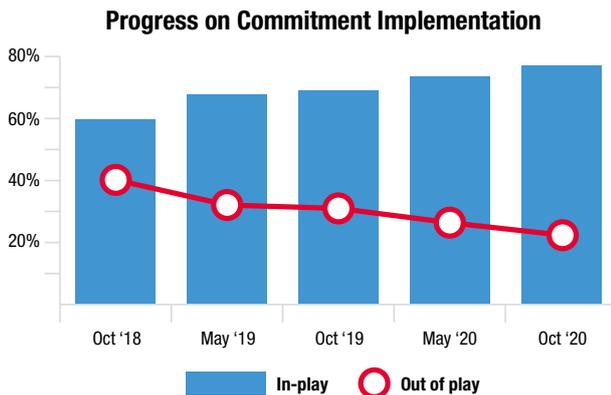
The commitments covered by this phase of the project are limited to the six themes listed above, although, as already mentioned, some Transparency International chapters and partner organisations are also tracking commitments beyond those themes, which are included on the website.

Given the way commitments have been drafted and the contextual background behind commitment implementation in each country, they should not be compared across countries, which means that aggregated analysis should be done in a cautious manner, and that the richness of the data is in the detail rather than in the sum of its parts. The progress of a commitment might take different paths across countries, as reforms are at varying stages depending on the context. This means that, for example, two commitments marked with the status of ‘ongoing’ under the same theme might not be at the same stage. Therefore, we encourage perusing the qualitative assessments in each commitment’s ‘Evidence’ and ‘Notes’ sections on our website to understand its journey and the reason behind its progress status.

Overall, it is important to note that the relevance of this tool transcends the mere research exercise: it is pegged to its advocacy power, and any analysis about its methodology should derive from that viewpoint.

OVERALL PROGRESS

The overall trend over the past two years highlights a gradual progress towards higher implementation. There has been an increase of 18 per cent of commitments in play, from 60 per cent in October 2018 to 77 per cent in October 2020.



Source: Global Anti-Corruption Pledge Tracker:
www.anticorruptionpledgetracker.com¹⁴

Monitoring to foster better dialogue between the government and civil society

Many Transparency International chapters and partners engaging in this initiative have reported on the benefits of pledge tracking, not only as a mechanism to hold governments to account or to ensure that citizens are aware of the progress (or lack thereof) in each country, but also to foster a dialogue that can result in better collaboration with the government. The small act of engaging in a conversation with the government sometimes has a critical impact. For example, according to Transparency International New Zealand “the regular engagement has normalised a consultative and advocacy relationship between TINZ as a leading civil society actor, and the government”.

However, where the political situation is not favourable, summit follow-up can have limited value in securing implementation, as Transparency International Australia has reported. Negative assessments of progress can risk alienating reformers. Advocacy tactics must be informed by and adapted to each political context. Understanding the motivations and constraints of governments is essential to successfully achieve reform.

PROGRESS BY THEMATIC AREA

BENEFICIAL OWNERSHIP

Introduction

There is no doubt that the use of anonymous companies to hide and transfer stolen funds enables corruption and illicit finance transnationally. Back in 2016, commitments related to beneficial ownership information collection and sharing, in order to understand who is behind these companies, generated the largest number of commitments from all Summit participants. 47 per cent of those were concrete and specific.

Pledges were made to explore or establish registers of beneficial ownership; to increase transparency of beneficial ownership around companies bidding for public contracts; some welcomed the establishment of transparent central registers for buying

property; and other countries committed to take unspecified steps towards increasing beneficial ownership transparency (BOT).

This latest iteration has monitored 51 commitments

under this area: 71 per cent of these are *in play*. Although these figures show that reform is taking place, implementation is happening at a slow pace given the importance of this issue. Most activity is seen in establishing public and central registers of beneficial ownership. However, there is a long way to go when it comes to interoperability of datasets, such as commitments linking these platforms with public contracting or property purchasing.

¹⁴ This graph includes commitments that fall in our priority areas and which have been monitored consistently throughout all iterations between October 2018 and October 2020. These amount to 87 commitments from 15 countries: Afghanistan, Australia, Bulgaria, Georgia, Ghana, Indonesia, Jordan, Kenya, New Zealand, Nigeria, Russia, South Korea, Sri Lanka, Ukraine and United Kingdom.

Public and Central Registers

There has been progress in the implementation of registers of beneficial owners over the past two years: the percentage of commitments in play has increased from 57 per cent in October 2018 to 93 per cent in this iteration¹⁵. Although this shows a positive trend in terms of the increased activity on these commitments, most of them are still *ongoing*, which suggests that the pace at which reform is happening is slow, or that, due to their nature, these require constant update and refinement, and hence can never become *complete*.

BOT and Public Contracting

As of October 2020, 75 per cent of commitments related to the transparency of beneficial owners that engage in public contracting were *out of play*¹⁶. The progress of these commitments has stalled, and reduced public procurement transparency in handling the COVID-19 pandemic furthers this delay. The widespread use of emergency provisions allows governments to avoid procurement processes, and therefore hinders the effort towards ensuring more transparency in this space.

BOT and Property

In October 2020, 67 per cent of commitments relating to the transparency of beneficial owners that engage in property purchase are *out of play*¹⁷. When looking back over the past two years, it becomes clear that this is a sustained trend.

In fact, progress has been stagnating on commitments relating to beneficial ownership and property: between 50 and 67 per cent¹⁸ of these have remained ‘out of play’ over the past two years.

An example of this is that of the UK, which committed to establish a public register of company beneficial ownership information for foreign companies that already own or buy property in the UK. This commitment has been overdue since 2018 because the Registration of Overseas Entities Bill has not yet been tabled in Parliament despite the public consultations, parliamentary recommendations and its inclusion both in the Queen’s speech and in the UK Economic Crime Plan¹⁹. The Bill would require all overseas companies that own UK property to reveal their ‘ultimate beneficial owners’. Individuals and businesses are still able to use UK property to hide their ill-gotten gains by purchasing it through a company in a secrecy jurisdiction like the British Virgin Islands.

Key learnings and recommendations

- Beneficial ownership transparency’s importance is becoming more recognised and understood around the world.
- While progress has been reported, ongoing remains the most suited status for marking this type of commitments. This can suggest that implementation is moving at a rather slow pace, and that it is an area of constant update and refinement, and therefore commitments in this area can never become complete.
- The establishment of public registers of beneficial owners is welcome, however more needs to be done to ensure these registers are up to standard, in terms of compilation and verification of data.
- Stagnating and unambitious progress on cross-thematic areas and the interoperability of datasets suggests that more effort should be placed in understanding and raising

International achievements

The Global Beneficial Ownership Campaign – The main instrument of delivery of this campaign is the Beneficial Ownership Leadership Group coordinated by Open Ownership, the leading organisation raising global standards of beneficial ownership transparency. **The Beneficial Ownership Leadership Group**²⁰ came together in 2019 to drive the global policy shift towards free, open beneficial ownership data. By joining this group, each country signs up to a set of best practice disclosure principles. Currently, five countries have officially signed up to this initiative (Armenia, Kenya, Mexico, Latvia and the Slovak Republic), and two out of the five are also countries in the global pledge tracker. In the latest UK Anti-Corruption Strategy update, it is stated that, to date, a dozen countries have expressed an interest in signing these principles²¹. Transparency International UK highlights the UK’s recent intention to join the Beneficial Ownership Leadership Group²², as well as to verify information on its own register, and encourages the Government to take this forward.

¹⁵ In October 2018, 8 commitments out of 14 were in play (57%). In October 2020, 13 out of 14 commitments became in play (93%).

¹⁶ Specifically, this means that six commitments out of eight on beneficial ownership and public contracting were out of play in October 2020.

¹⁷ Specifically, this means that four out of six commitments on beneficial ownership and property are out of play in October 2020.

¹⁸ Only two and three commitments in play over the past two years out of six overall commitments on property and beneficial ownership, respectively.

¹⁹ www.ukanticorruptionpledgetracker.org/pledges/property-ownership/

²⁰ www.openownership.org/what-we-do/the-beneficial-ownership-leadership-group/

²¹ UK Anti-Corruption Strategy Year 2 update, 2020, p. 18. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/902020/6.6451_Anti-Corruption_Strategy_Year_2_Update.pdf

²² High-level panel discussion: “Building back better: beneficial ownership transparency during a crisis”. Available at: www.openownership.org/blogs/video-building-back-better-beneficial-ownership-transparency-during-a-crisis/

Some examples²³

The Afghan cabinet has recently approved the regulation on beneficial ownership, after consultation with civil society and the publication of an online version to allow for public comments.

In August, the legislative framework for Nigeria's central register of persons of significant control (PSC) was enacted

through the Companies and Allied Matters Act (CAMA). Ghana and Kenya recently launched central beneficial ownership registers.

In Ghana, this will be piloted through the Ghana Extractive Industries Transparency Initiative (GHEITI).

The UK Crown Dependencies and ten of the UK's Overseas Territories have committed to implement publicly accessible registers of company beneficial ownership. Gibraltar has already established its own register.

ASSET RECOVERY

Introduction

Asset recovery was another major theme at the Summit. Several commitments were pledged to strengthen legislation, ensure detection, seizure and return of stolen assets from foreign jurisdictions, developing internationally-endorsed guidelines for the transparent and accountable management of returned assets.

As of this iteration, 87.5 per cent of asset recovery promises are being or have been implemented²⁴, highlighting increasing international consensus that this area of work is vital to ensure that proceeds of corruption are recovered and repatriated to the rightful owners.

Strengthening legislation

Progress has been reported in relation to asset recovery legislations – as of October 2020, 100%²⁵ of commitments are in play. One of the main challenges has been transposing some of the international commitments into national legislation, as it has become clear that not all jurisdictions' legislative systems are suited to certain asset recovery mechanisms, for example, non-conviction based confiscation. Nonetheless, steps to create and strengthen national asset recovery legislation have been taken in virtually all countries monitored in the pledge tracker.

International achievements

Global Forum on Asset Recovery (GFAR)²⁶ – In its latest update to its Anti-Corruption Strategy, the UK Government reports that the last international expert meeting on the return

of stolen assets hosted by the UNODC in May 2019 built on the principles set out in the GFAR meeting in 2017. While the meeting highlighted that there is appetite for more conversations of this sort - excluding the countries that were part of the GFAR in 2017 - in October 2020, 60 per cent of commitments on asset recovery guidelines, pledging to develop internationally endorsed asset recovery guidelines, are *out of play*²⁷.

Some examples²⁸

In Afghanistan, the first asset recovery regulation was introduced in July 2020.

The Nigerian Government passed the Proceeds of Crime Bill in the second half of 2019. CISLAC, the Transparency International chapter in Nigeria, considers that it seeks to harmonise the asset recovery regime in the country through a number of changes, such as the establishment of the Proceeds of Crimes Recovery and Management Agency.

South Korea issued a Special Act on Confiscation and Recovery of Corrupt Property in 2019 to comply fully with the United Nations Convention against Corruption (UNCAC). The Act includes procedures for confiscation and return of proceeds of crime both nationally and internationally, including compensation of victims.

²³ For more information on these examples, please refer to: www.anticorruptionpledgetracker.com/

²⁴ 28 out of 32 commitments on asset recovery are in play as of October 2020.

²⁵ Nine out of nine commitments on asset recovery legislation are in play.

²⁶ UK Anti-Corruption Strategy Year 2 update, 2020, p. 26. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/902020/6.6451_Anti-Corruption_Strategy_Year_2_Update.pdf

²⁷ Three out of Five commitments on asset recovery guidelines are out of play in October 2020.

²⁸ For more information on these examples, please refer to: www.anticorruptionpledgetracker.com/

Key learnings and recommendations

- Governments should ensure that deeper discussions take place and negotiations on a new international agreement are held, to bridge the legislative gap among certain countries. Whilst more conversations are taking place to increase the level of international cooperation around asset recovery, the issue remains confined to an expert arena.

- One key learning from the Summit is that representatives participating in international multilateral events and making commitments should first undergo a preparatory and consultative process with expert civil servants and civil society in their own countries, to ensure that, upon return, their commitments are achievable and implementable in their jurisdiction.

PUBLIC PROCUREMENT AND OPEN DATA

Introduction

The third major theme at the 2016 Summit was public procurement transparency. Several commitments were made on publishing open and transparent public contracting information, as well as implementing the Open Contracting Data Standard (OCDS) principles. In addition, almost a quarter of pledges looked at strengthening procedures for debarment corrupt companies from public tenders - primarily by creating or improving central databases and sharing data across borders. Four governments also committed to implementing open contracting in their healthcare sectors.

There has been some progress in the implementation of commitments on public procurement, from 69 per cent of pledges *in play* in October 2018²⁹ to 82 per cent as of October 2020³⁰. The overall improvement in this area suggests that the rights of citizens to availability of data and public procurement transparency are now recognised.

Nonetheless, this optimism has been tainted by a global negative trend of governments limiting the access to timely procurement information with the outbreak of the pandemic and the use of emergency provisions. Whilst this has sped-up the response to increased demand for supplies, it has come at the cost of transparency and accountability.

So far during the pandemic, media reports and campaign groups have raised questions over the appropriateness of emergency procurement. This includes suggestions of cronyism and poor due diligence by contracting bodies in relation to large public contracts. At best, the continuance of uncompetitive contracting raises suspicion of foul play.

Open Contracting Data Standards (OCDS)

²⁹ 25 out of 36 commitments on public procurement were in play in October 2018. Brazil, France, and Trinidad and Tobago were not included in that iteration.

³⁰ Until April 2019, Brazil and France were not included. Specifically, this means that 28 commitments out of 34 were in play in October 2020.

³¹ This means that seven out of eight commitments on OCDS are in play in October 2020.

³² In October 2018, six out of eight commitments on OCDS were in play.

³³ Specifically, this means that seven out of eleven commitments on debarment databases and corrupt bidders are in play and four, out of play.

³⁴ Eight out of fourteen commitments are in play.

³⁵ For more information on these examples, please refer to: www.anticorruptionpledgetracker.com/

As of October 2020, 87 per cent of commitments on OCDS are *in play*³¹, as opposed to 75 per cent in October 2018³².

While there has been progress in setting up online procurement portals, the pandemic has slowed processes and many platforms are still not OCDS compliant.

Corrupt Bidders and Debarment Databases

As of October 2020, 64 per cent of commitments on debarment databases and corrupt bidders are *in play*³³. When looking at the past two years, it becomes clear that this number has been stagnating, remaining at 57 per cent³⁴. As a result, the improvements in this thematic area are attributable to the improvements in Open Contracting Data Standards. Clearly, more data is available within open data and procurement portals. However, this data could be used more proactively: by including lists of corrupt contractors or sharing this information across borders.

Some examples³⁵

In Afghanistan, **AGEOPS** is OCDS compliant and was set up as the official procurement portal in August 2018. The website has a section dedicated to COVID-19 contracts, making it easy to monitor.

Australia publishes OCDS readable and compliant data across all areas of government on the government website and through the AusTender site.

Bulgaria's new public procurement **portal**, has been established very recently. Although the new website is

mandatory to use, it is still not entirely functional and requires further enhancement.

In Ukraine, Prozorro, a platform for public procuring entities, is being used to collect all offers in one place. During the crisis, test kits, sanitizers, masks, and protective equipment, were quickly added to the stocklist.

Brazil's **Transparency Portal** is OCDS compliant. Despite the amount of public data made available in open formats about public procurement in the Transparency Portal, in the Open Data Portal and in the Government Procurement Portal, there are still no standards that guarantee the data is published in good quality or ready to be reused by stakeholders.

Mexico's **Plataforma Digital Nacional** holds open data on political transparency and integrity, and an **open contracting portal** has recently been established, including a visualisation tool and a tab to explore individual contracts.

Key learnings and recommendations

- The promising figures above still require a further push to achieve complete implementation – whilst 87% of OCDS commitments are underway, ongoing or complete, this does not mean that most will be achieved any time soon.
- Commitments on the debarment of corrupt companies from public procurement are still lagging behind. This has become more of a problem during the COVID-19 pandemic, with emergency procurement processes resulting in less scrutiny over who wins public contracts.
- Progress in the development of public procurement websites still has a long way to go. The websites above are examples of open procurement and open data portals that have been set up over the past four years. However, many still lack the necessary features to be compliant with Open Data Contracting Standard principles and publish public procurement data on a regular basis.

WHISTLEBLOWING AND CIVIL SOCIETY SPACE PROTECTION

The current state of the world health crisis has underlined the importance of whistleblower protection both in the public and private sectors. At the 2016 Summit, only 15 countries committed to strengthen mechanisms to make it easier for citizens to report corruption and to protect whistleblowers who take personal risks to unveil corruption.

As of October 2020, 91 per cent of the commitments in our pledge tracker under this thematic area are *in play*³⁶. While having a legal framework for whistleblower protection is the first step, this does not automatically entail implementation and enforcement of the law, especially as Transparency International partners around the world report that the brave people who put their lives and livelihoods at risk to report corruption continue to face varied degrees of retaliation.

Some examples³⁷

In Australia, private sector whistleblowers are protected under the Corporations Act 2001, which was expanded in 2019 to provide greater protection. Protection for public sector whistleblowers instead comes under the Public Interest Disclosure Act 2013, which should be revised and reformed.

Brazil relies on a network of federal, state and municipal Ombudsperson Offices to receive and process reports of corruption, which proved useful during the COVID-19 pandemic to report irregular health services, infringement of social isolation rules and frauds in the emergency aid programme. While amendments to the whistleblowing laws in the public sector in December 2019 enforced the anonymity of reporters of corruption, more needs to be done to adhere to international best practices.

In Indonesia, the revised Government Regulation Number 43 of 2018 increased the incentives promised to reporters of corruption. Yet, Transparency International Indonesia found that there have been at least 100 threats of attack against whistleblowers of corruption since 2004, and this number continues to increase. Weak legal protection is the main problem.

In Bulgaria, the recently adopted EU Whistleblowing Directive imposes the obligation to provide safe channels for reporting and measures for protection of whistleblowers by December 2021. Transparency International Bulgaria was invited to oversee the consultations of the working group to transpose this legislation in national law. The process was interrupted during 2020 due to the state of emergency.

³⁶ This means that out of 11 commitments/countries, 10 are in play and one is out of play.

³⁷ For more information on these examples, please refer to: www.anticorruptionpledgetracker.com/

In Ghana, even though the Witness Protection Act was passed in 2018, little is being done by way of enhancing knowledge of the laws. The Citizens Complaints Centre, pledged through a commitment at the Summit, was set up in Accra in 2016, yet no others were established in the regions. The newest development is the setup of a 'Helpline of Hope' Call Centre, which takes complaints related to general rather than crimes specifically related to corruption.

In South Korea, retaliation against whistleblowers is now punishable with up to three years in prison. The Public Interest Whistleblower Protection Act was revised in May 2020, adding special procedures.

Key learnings and recommendations

Whilst some progress has been achieved in the protection of whistleblowers, more work needs to be done to improve legal frameworks to meet international standards and best practice, as well as increase enforcement of these provisions.

LAW ENFORCEMENT

At the 2016 Summit, several countries pledged to set up law enforcement mechanisms for sharing financial intelligence to be strengthened, to ensure more effective investigation and prosecution of the corrupt. In particular, 14 countries committed to participate in a new **International Anti-Corruption Coordination Centre (IACCC)**³⁸. The IACCC is now hosted by the UK National Crime Agency and sees the participation of law enforcement bodies from New Zealand, Australia, Canada, and the US³⁹.

The most recent update comes from the year 2 update of the UK National Anti-Corruption Strategy, which states:

“The International Anti-Corruption Co-ordination Centre (IACCC) is working to recover stolen assets. The IACCC shares intelligence across jurisdictions and builds capacity to support grand corruption cases in developing countries. The centre has worked on 27 cases and supported a number of high profile arrests involving politicians and public officials across the world”^{39,40}.

In July 2020, the IACCC launched a new associate membership scheme, which will allow law enforcement agencies from smaller financial centres to join the IACCC⁴¹.

Key learnings and recommendations

The International Anti-Corruption Coordination Centre (IACCC) is one of the great successes of the 2016 Anti-Corruption Summit. However, 67 per cent of commitments in this group are inactive or marked as no data. In fact, Kenya, Nigeria, Spain and Ukraine pledged to participate in the IACCC, yet there is no public evidence that they do. There was clear interest at the Summit by these countries to join the IACCC, so it is likely that seeking their inclusion would represent a good opportunity for new allies to collaborate in the fight against corruption.

³⁸ Transparency International UK, 2016, “Was it Worth it?” Assessing government promises at the 2016 Anti-Corruption Summit, p.8.

³⁹ www.nationalcrimeagency.gov.uk/what-we-do/crime-threats/bribery-corruption-and-sanctions-evasion/international-anti-corruption-centre

⁴⁰ UK Anti-Corruption Strategy year 2 update, 2020, p.29. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/902020/6.6451_Anti-Corruption_Strategy_Year_2_Update.pdf

⁴¹ Ibid 39.

PROGRESS BY COUNTRY

AFGHANISTAN

Assessment by Integrity Watch Afghanistan:

Achievements

“Tracking the commitments has kept the Afghan Government on its toes.”

“While the Government was not able to take major steps initially, the creation of the Special Anti-Corruption Secretariat and development of yearly anti-corruption strategy benchmarks, led to important progress on beneficial ownership and asset recovery.”

Challenges

“Afghanistan is facing a major war with insurgent groups. The prioritisation of anti-corruption has been rare and the institutions that are expected to bring reform have displayed deeply corrupt behaviour.

A change in the government’s willingness to establish strong anti-corruption agencies was a major challenge. The government took five years to approve an anti-corruption law (also a commitment under the London Summit) and this delayed progress.”

Recommendations for the Future

“In spite of a challenging environment, Afghanistan has no other solution but to strengthen its democratic institutions, improve service delivery and rid its justice agencies of corruption.”

“There is a need for the government to commit to a major state reform agenda, such as the reform of justice agencies. This would turn the parliament from a “house of corruption” to an effective oversight body, and finally establish and strengthen regulatory and oversight commissions, such as the Supreme Audit Office, the Access to Information Commission, and the Anti-Corruption Commission, among others.”

Afghanistan Anti-Corruption Pledge Tracker:

www.ac-commitments.af

OVERVIEW

This table summarises the progress that the government of Afghanistan has made on delivering commitments from the Summit, across six themes, since 2016.

The commitments listed here are taken from Afghanistan’s country statement, which includes other commitments across different themes⁴².

Theme	Focus Issue	Summit Commitment	Status
Asset Recovery	Asset Recovery Guidelines	Developing internationally endorsed guidelines for the transparent and accountable management of returned stolen assets,	Ongoing
Asset Recovery	Legislation	Strengthening asset recovery legislation, including through non conviction based confiscation powers and the introduction of unexplained wealth orders	Ongoing
Asset Recovery	Compensation	Common principles governing the payment of compensation to the countries affected, to ensure that such payments are made safely, fairly and in a transparent manner	Ongoing

⁴² Afghanistan Anti-Corruption Summit Country Statement (May 2016) https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/522697/Afghanistan

16. TRANSPARENCY INTERNATIONAL – FROM PRACTICE TO IMPACT

Theme	Focus Issue	Summit Commitment	Status
Beneficial Ownership	Access to Domestic Law Enforcement	Ensuring that law enforcement agencies have full and effective access to beneficial ownership information for companies and other legal entities registered within their jurisdiction,	Ongoing
Beneficial Ownership	Property	Taking steps to ensure transparency of the ownership and control of all companies involved in property purchase and public contracting. Supporting the establishment of transparent central registers of foreign companies bidding on public contracts and buying property, and intend to explore options for taking similar action.	No Data
Beneficial Ownership	Public Contracting	Taking steps to ensure transparency of the ownership and control of all companies involved in property purchase and public contracting. Supporting the establishment of transparent central registers of foreign companies bidding on public contracts and buying property, and intend to explore options for taking similar action.	No Data
Beneficial Ownership	Public Register	Establishing public central registers of company beneficial ownership information	Ongoing
Public Procurement	Corrupt Bidders	Exploring ways of sharing information on corrupt bidders across borders	Ongoing
Public Procurement	Debarment Database	Establishing accessible central databases of companies with final convictions	Ongoing
Public Procurement	Open Contracting Data Standard	Working towards phased implementation of the principles of the Open Contracting Data Standard, focusing on major projects as an early priority	Ongoing

AUSTRALIA

Assessment by Transparency International Australia:

Achievements

“The key achievements of monitoring the 2016 Anti-Corruption Summit Commitments in the country have been: a) informing and strengthening advocacy on key issues; b) Maintaining credibility with key public servants; c) Strengthening engagement on the Open Government Partnership; d) Strengthening engagement on the advocacy for the G20 Anti-Corruption Working Group agenda.”

Challenges

“The challenges of monitoring have related to: a) the restructuring of key Government departments and the consequent lack of direct involvement in the UK Summit (which the then Prime Minister did not attend); b) repeated change of the Prime Minister and Ministerial responsibilities for key commitments; c) Additionally, the impact of COVID-19 compounded all of the above.”

Recommendations

“It seems unlikely that any strengthening of Australia’s UK Summit commitments in alignment with global standards will be realised under the current Coalition Government. This is particularly unlikely on climate change, the environment, illicit financial flows and public integrity.”

“The lack of action is disappointing, but nonetheless we are committed to strengthening our advocacy efforts to achieve these standards.”

OVERVIEW

This table summarises the progress that the government of Australia has made on delivering commitments from the Summit, across six themes, since 2016.

The commitments listed here are taken from Australia’s country statement, which includes other commitments across different themes⁴³.

Theme	Focus Issue	Summit Commitment	Status
Asset Recovery	Legislation	Australia has effective laws for asset recovery, including non-conviction based confiscation powers and unexplained wealth orders. We will continue to review our legislative framework to ensure its continued effectiveness.	Ongoing
Beneficial Ownership	Central Register	Australia is committed to exploring, via public consultation, options for a beneficial ownership register for companies.	Complete ⁴⁴
Beneficial Ownership	EITI	We welcome the new 2016 EITI Standard, in particular the requirements on beneficial ownership and the sale of the state’s share of production.	Inactive
Beneficial Ownership	Information collection, sharing, availability	Australia has tracing powers for beneficial ownership of listed companies and investment schemes and is committed to ensuring that adequate, accurate and timely information on beneficial ownership and control is available to competent authorities.	No Data
Law Enforcement	International Anti-Corruption Coordination Centre	Australia will work with the UK and others to establish the new International Anti-Corruption Coordination Centre, to streamline and focus international cooperation in cases of grand corruption with international dimensions.	Complete
Public Procurement	Open Contracting Data Standard	Australia supports the Open Contracting Data Standard, and notes the role the Standard can play in encouraging machine-readable open data formats across all areas of government.	Ongoing
Whistleblower/ Civil Society Space Protection	Protecting Whistleblowers	Australia is developing strengthened whistleblower protections designed to protect those who disclose information on tax misconduct to the Australian Taxation Office. Whistleblowers will have their identity protected and will be protected from victimisation and civil and criminal action to encourage them to come forward and help support compliance with Australia’s tax laws.	Ongoing

⁴³ Australia Anti-Corruption Summit Country Statement (May 2016) https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/522699/Australia.pdf

⁴⁴ This is complete due to the way in which the commitment was drafted, which reflects our own learnings on the importance of ‘active’ commitments, which will be mentioned in the following sections. For more information on this commitment, check: <https://www.anticorruptionpledgetracker.com/commitments/central-register/>

BRAZIL

Assessment by Transparência Internacional Brasil:

Achievements

“Brazil fulfilled at least three important commitments: providing open data about public procurement, consolidating a debarment database and building institutional capacity on integrity and transparency. These are relevant advancement, although insufficient to the scale of the challenge.”

Challenges

“Since 2018, beneficial ownership data has been reported to the State, but this information has not been made available to the public or considered in public procurement procedures.

Also, procurement open data has been released in a decentralized way, via different portals, making it difficult to find the data of interest.”

Recommendations

“Brazil has a pressing need for a clear and solid rule defining beneficial ownership regime, mandating the collection of this information and establishing a transparency policy – with open, machine-readable, accessible and timely data. This is an important gap in the country’s anti-money laundering efforts.

Open contracting measures in Brazil could improve with much-needed efforts to concentrate information from all federal levels on one website.”

OVERVIEW

This table summarises the progress that the government of Brazil has made on delivering commitments from the Summit, across six themes, since 2016.

The commitments listed here are taken from Brazil’s country statement, which includes other commitments across different themes⁴⁵.

Theme	Focus Issue	Summit Commitment	Status
Beneficial Ownership	Information collection, sharing, availability	Brazil is implementing measures and regulations to ensure that information on beneficial owner of companies is obtained, verified, recorded and kept up-to-date	Inactive
Beneficial Ownership	Public Contracting	Brazil has also taken measures to guarantee that information on the beneficial owner of companies participating in bids and public procurement processes is assembled and verified before the establishment of public contracts.	Inactive
Public Procurement	Open Data	Brazil is committed to make data on public procurement open by default, providing usable, timely and shareable information.	Complete
Public Procurement	Debarment Database	Brazil is committed to ensuring full access and transparency of information on companies punished in the terms of the Corporate Liability Law and the Public Procurement Law, through the use of the National Registry of Punished Companies (CNEP) and the Registry of Ineligible and Suspended Companies (CEIS)	Complete
Whistleblower/ Civil Society Space Protection	Reporting Corruption	Brazil will continue to strengthen mechanisms to make it easier for citizens to report corruption, to facilitate actions including by law enforcement on the information provided, and to protect “whistle blowers” and others in the public and private employees who take personal risks to unveil corruption activities.	Ongoing

⁴⁵ Brazil Anti-Corruption Summit Country Statement (May 2016) https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/522742/Brazil.pdf

BULGARIA

Assessment by Transparency International Bulgaria:

Achievements

“The Summit commitments tracker is a useful tool for non-government organisations and wider society to measure national performance against international standards. Although in Bulgaria it had rather limited influence, we consider it a good instrument for applying international pressure on national governments to keep them accountable for their actions.”

Challenges

“One of the challenges that we faced while tracking the London Anti-corruption Summit commitments, made by the Bulgarian government, was the poor definition of the commitments and the absence of public information on specific measures, indicators and ownership of them.”

“While we recognise that an effective anti-corruption policy needs a holistic approach, it cannot be reached without defining specific objectives and setting feasible action plans for their achievement.”

“The other challenge is related to the lack of in-country communication from the Government about their London Summit commitments. This was a disadvantage in terms of lack of media interest, shrinking civil society space, and stronger public pressure over the executive.”

“Last but not least, in 2017 there were national elections and, while the ruling party remained the same, the government coalition and their priorities changed. This undoubtedly contributed to a lack of determination to achieve positive change in recent years.”

Recommendations

Transparency International Bulgaria’s key recommendations for the Bulgarian Government are:

- Strong political will, going beyond good intentions and materialising in specific actions
- Strategic planning, which is not influenced by the current political conjuncture, rather aligning clear long-term vision in the public interest
- More precise, and feasible commitments with a clear view of the means for their achievement
- The elaboration of an action plan and mechanisms for on-going monitoring of progress.

OVERVIEW

This table summarises the progress that the government of Bulgaria has made on delivering commitments from the Summit, across six themes, since 2016.

The commitments listed here are taken from Bulgaria’s country statement, which includes other commitments across different themes⁴⁶.

Theme	Focus Issue	Summit Commitment	Status
Asset Recovery	Accountable Repatriation	Bulgaria commits to providing technical assistance and expertise on asset recovery and welcomes international cooperation on transparent and accountable management of returned assets.	Ongoing
Asset Recovery	Legislation	Bulgaria commits to uncovering, seizing and returning the proceeds of corruption to their legitimate owners. Bulgaria’s Commission for the Withdrawal of Criminal Assets has gained strength and considerable experience in recovering and confiscating illicit proceeds and will benefit from its proposed inclusion in a new powerful Anti-corruption Bureau proposed under the Draft Corruption Prevention and Confiscation of Criminal Assets Act. The draft Law focuses on cases of unexplained wealth and allows for the reversal of burden of proof.	Ongoing

⁴⁶ Bulgaria Anti-Corruption Summit Country Statement (May 2016) https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/522700/Bulgaria.pdf

Theme	Focus Issue	Summit Commitment	Status
Beneficial Ownership	Public Contracting	Bulgaria commits to actively investigating the link between corruption and organised crime. Organised criminals use the proceeds from illicit market activities and contraband to influence the judiciary, law-enforcement, central and local government, and the media in order to facilitate their criminal activities, launder proceeds, or win public contracts for their legal fronts. Profits from public contracts awarded to companies linked to organised crime are used to finance VAT fraud schemes or the illicit trade in excise tax goods or drugs. Seizing the profits of organised criminals and denying access to public contracts of their front companies is key to tackling corruption.	No Data
Beneficial Ownership	Public Register	Bulgaria commits to exposing illicit financial flows through lifting the veil of secrecy over who owns and controls companies. It already has made public its registry for companies registered under its own jurisdiction and supports internationally recognised measures that ensure accurate and timely information on foreign registered beneficial ownership is made available to all those who need it.	No Data
Public Procurement	Open Contracting Data Standard	Bulgaria commits to the implementation of the Open Contracting Data Standard as part of its new e-government procurement work.	Overdue
Public Procurement	Transparency and Integrity	Bulgaria commits to keeping public contracting and government budgets open and transparent to prevent and expose the theft and misuse of taxpayers' money.	Ongoing
Whistleblower/ Civil Society Space Protection	Reporting Corruption	Bulgaria commits to ensuring citizens are able to report incidents of corruption without fear of reprisal and with confidence that any credible information they provide will be acted on and their identity protected when necessary. Bulgaria's Draft Corruption Prevention and Confiscation of Criminal Assets Act has detailed provisions regarding the credibility and admissibility of anonymous signals aiming to encourage citizens to report corruption while protecting their identities.	Underway

FRANCE

Assessment by Transparency International France:

Achievements

“2016 was the year of the London Anti-Corruption Summit, but it was also the year when the anti-corruption Sapin 2 was adopted. The introduction of this law completed several of France’s Summit commitments (including the creation of the anti-corruption agency, and the whistleblower protection legal framework)”

“After four years of enforcement, the period to evaluate the effectiveness of such a milestone has just begun. One can, however, already state that France is now playing a leading role in international coordination in the fight against corruption.”

Challenges

“The adoption of the Sapin 2 is being followed by a quiet period in term of anti-corruption legislation. France’s major reforms in this field are mainly coming from the EU (transposition of the Fourth and Fifth Anti-Money Laundering Directives for instance,

and the upcoming transposition of the whistleblower protection directive).”

Recommendations

The French Government should:

- Provide access to beneficial ownership information to the general public in an open format, freely downloadable without conditions
- Set up a legal and budgetary mechanism allowing for the transparent and accountable repatriation of confiscated stolen assets

OVERVIEW

This table summarises the progress that the government of France has made on delivering commitments from the Summit, across six themes, since 2016.

The commitments listed here are taken from France’s country statement, which includes other commitments across different themes⁴⁷.

Theme	Focus Issue	Summit Commitment	Status
Asset Recovery	International Cooperation	France supports full enforcement of the UNCAC asset recovery provisions, and commits to strengthen its asset recovery legislation, including through the developing of internationally endorsed guidelines for the transparent and accountable management of returned stolen assets.	Ongoing
Beneficial Ownership	Automatic Exchange of Information	France will participate to the pilot initiative for automatic exchange of beneficial ownership information.	Complete
Beneficial Ownership	Property	We will take steps to ensure transparency of the ownership and control of all companies involved in property purchase and public contracting.	Ongoing
Beneficial Ownership	Public Contracting	We will take steps to ensure transparency of the ownership and control of all companies involved in property purchase and public contracting.	Ongoing
Beneficial Ownership	Public Register	France will establish as soon as possible beneficial ownership registers for legal persons as well as for trusts, that will be made accessible to the public.	Underway
Law Enforcement	International Anti-Corruption Coordination Centre	France will work with the UK and others to design the concept of an International Anti-Corruption Coordination Centre that aims at streamlining and focussing international cooperation in cases of corruption with international dimensions	Dropped

⁴⁷ France Anti-Corruption Summit Country Statement (May 2016) https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/522751/France.pdf

22. TRANSPARENCY INTERNATIONAL – FROM PRACTICE TO IMPACT

Theme	Focus Issue	Summit Commitment	Status
Open Data	Data Literacy	We commit to leverage open data, big data and data sciences to foster data-driven anti-corruption policies. We will grow a culture of openness, data literacy and digital technologies by producing training modules on open data, the use of data and open government targeting public officials, and including more of these modules in initial and continuing civil service training programs.	Ongoing
Open Data	Open Data Charter	France will implement the principles of the International Open Data Charter	Ongoing
Public Procurement	Auditing	We will improve and develop the auditing of public contracts performance, and commit to standardise the format of data of public call for tenders and encourage increased publicity of awarded public tenders to foster transparency on public procurement	Ongoing
Public Procurement	Open Contracting	As a founding member of the C5 initiative, we commit to implementing Open Contracting and to take into account the principles of Open Contracting Data Standard into our domestic framework.	Ongoing
Whistleblower/ Civil Society Space Protection	Protecting Whistleblowers	Persons reporting corruption will benefit from a tailored protection, regardless of the field of their company activity.	Complete
Whistleblower/ Civil Society Space Protection	Protecting Whistleblowers	We commit to adopt measures to ensure the protection of persons reporting corruption against retaliatory measures which might be taken against them by their employer.	Complete
Whistleblower/ Civil Society Space Protection	Reporting Corruption	France will create a National Agency for the Detection and Prevention of Corruption to monitor the implementation of internal procedures to prevent bribery by requested companies and provide appropriate assistance to persons reporting corruption.	Complete

GEORGIA

Assessment by Transparency International Georgia:

Achievements

“The Government of Georgia has made little to no considerable progress in the implementation of commitments made at the London Anti-Corruption Summit in 2016.”

“The pledges made at the Summit were a perfect opportunity to move forward in adopting the principles of the Open Contracting Data Standard and take the necessary steps to ensure the transparency of ownership of companies taking part in public procurement. The processes have been visibly halted despite what seemed like a promising start.”

“As a result, Georgia has been unable to use the window of opportunity to build upon its past success in its procurement system. The second commitment hasn’t been prioritised either, with the Government not taking any tangible first steps to increase the transparency of ownership of companies taking part in public procurement.”

Challenges

“Despite numerous attempts by civil society to remind the Government of the importance of the commitments undertaken at the London Anti-Corruption Summit in 2016, political progress has remained mostly glacial. There has been a noticeable lack of ‘government champions’ to drive progress and ensure due implementation, or at the minimum keep the issues on the Government’s agenda.”

Recommendations

“Openness, accountability, and honesty are the backbone of government transparency. As such, the Government should follow through with its international obligations by holding meaningful conversations with civil society and pursuing actions that would ensure the timely implementation of said commitments.”

“Moreover, it should become customary for governments to share information with citizens that is needed to make informed decisions and hold officials accountable. To this end, Georgia should strive to establish an independent Anti-Corruption Agency to better target more complex and specifically high-level corruption.”

OVERVIEW

This table summarises the progress that the government of Georgia has made on delivering commitments from the Summit, across six themes, since 2016.

The commitments listed here are taken from Georgia’s country statement, which includes other commitments across different themes⁴⁸.

Theme	Focus Issue	Summit Commitment	Status
Beneficial Ownership	Public Contracting	Georgia will take steps to ensure transparency of the ownership and control of all companies involved in public contracting.	Inactive
Public Procurement	Open Contracting Data Standard	Georgia will work towards effective implementation of the principles of the Open Contracting Data Standard, focusing on major projects as an early priority. Georgia will implement the principles of the Open Data Charter.	Ongoing

⁴⁸ Georgia Anti-Corruption Summit Country Statement (May 2016) https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/522706/Georgia.pdf

GHANA

Assessment by Ghana Integrity Initiative:

Achievements

“The key elements for successful tracking of summit commitments in Ghana are: **inclusion and participation of citizens and the conversion of rhetoric into action.**”

Citizen’s involvement in the fight against corruption has been seen as key to progress in tackling it. The Ghanaian Government often fails to convert its global commitments into country frameworks for implementation. However, for the 2016 Summit commitments, citizens demanded fulfilment of the pledges and the Government was engaged to deliver them.”

“This resulted in the establishment of the Beneficial Ownership regime in Ghana, efforts toward increasing transparency in public procurement and passing laws to guarantee protection of citizens who report corruption or serve as prosecution witnesses. What is remarkable was that the change of government in 2017 did not affect the delivery of the commitments.”

Challenges

1. Information on progress from public institutions is slow
2. The change of government reduced the tempo of implementation as the new administration took time to settle in and had to be brought up to speed on the commitments. Also, bills left unpassed by a parliament were not passed on to a new parliament. This meant starting from scratch on all of the Parliamentary engagement.

Ghana Anti-Corruption Pledge Tracker:

<https://ghanaanticorruptionpledgetracker.org/>

OVERVIEW

This table summarises the progress that the government of Ghana has made on delivering commitments from the Summit, across six themes, since 2016.

The commitments listed here are taken from Ghana’s country statement, which includes other commitments across different themes⁴⁹.

Theme	Focus Issue	Summit Commitment	Status
Beneficial Ownership	Public Register	Ghana is committed to preventing the misuse of companies and legal arrangements to hide the proceeds of corruption and commits to strengthening further both the Companies Bill and the Petroleum (Exploration and Production) Bill that are currently before Parliament to ensure that we have public beneficial ownership information and central register for all sectors, including oil and gas sector, in line with UNCAC and FATF Recommendations as well as the Extractive Industries Transparency Initiative (EITI) standards that Ghana is implementing; ensuring that accurate and timely company beneficial ownership information, including in the extractives, is available and accessible to the public	Ongoing
Public Procurement	Debarment	Ghana is committed to exploring further options for improving transparency and openness in the area of public contracting and will continue to blacklist and debar service providers and contractors who engage in corrupt and other related misconduct in public procurement	Ongoing
Public Procurement	Open Contracting Data Standard	Ghana will work towards making government public procurement ‘open by default’ – beginning with Open Contracting Data Standards for high value contracts and contracts in the oil, gas and mining sector	Overdue
Whistleblower /Civil Society Space Protection	Reporting Corruption	Ghana is strengthening the necessary legislative and other measures to enhance the capacity of the public/citizens and encourage them to report corruption without fear of victimization, and commits to: improve and extend the recently established Citizens complaints Centre in Accra to other regions of the country	Ongoing

⁴⁹ Ghana Anti-Corruption Summit Country Statement (May 2016) https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/522707/Ghana.pdf

INDONESIA

Assessment by Transparency International Indonesia (TI-Indonesia):

Achievements

“Transparency International Indonesia has a reasonably strong position among policymakers, thus facilitating the communication process if there are difficulties in finding specific information regarding the achievement of commitments. For example, it was quite challenging to get information about Indonesian involvement in StAR initiatives. When we encountered these obstacles, we immediately communicated with colleagues at the Corruption Eradication Commission (KPK) to ask about these developments.

“The National Corruption Prevention Strategy Program, which has been running for almost two years, also contains several commitments included in the Anti-Corruption Summit. Our close relationship with the Joint Secretariat greatly facilitates the tracking process to run accurately, relevant, and timely.

“Simultaneously, strong communication between TI-Indonesia and other civil society organisations also facilitates comparing information and data from the Government.”

Challenges

“It appears that there is no integrated information from the Government or law enforcement in Indonesia in preparing reports on the progress of commitments. We also found the same symptoms when monitoring the progress of commitments in other similar initiatives.

“Although, in general, these commitments indirectly coincide with compliance with UNCAC and the National Strategy for Prevention of Corruption, scattered information will make it difficult for the public to monitor.

“We also found a very limited amount of information on asset recovery to assess these commitments. Apart from the lack of regulatory instruments, the data from law enforcers open to the public is very minimal, especially from the Police and the Attorney General's Office. At the same time, the KPK, after the new Law and having a new leadership rank, is no longer strong enough to encourage the effectiveness of the asset recovery program. It also seems that the Ministry of Law and Human Rights and the KPK have not shown their willingness in follow-up actions to report international commitments' progress.”

Recommendations

“Indonesia's international anti-corruption commitments made at the Summit are quite ambitious. Still, it is unclear how they

will be implemented or how they will be harmonised with other existing initiatives. The majority of these commitments do not have clear timelines, making comprehensive monitoring arduous. Consequently, there is no visible continuity between the implementation of commitments and their enforcement. The situation is compounded by the lack of community involvement in accessing data and information about these international commitments.

“In our view, the Government needs to endorse and evaluate these international anti-corruption commitments. The Government should share information on the progress of various commitments so that the wider community can be involved in monitoring them. This would showcase its political will and strengthen citizens' trust and involvement.

“We also urge the KPK, as the body responsible for the progress of international anti-corruption commitments, to proactively coordinate with the Central Government and regional governments in accelerating their implementation for the prevention of corruption. The KPK should develop an impact-based monitoring and evaluation strategy on the various international commitments, share information with the wider public, and formulate effective collaboration and communication models with civil society groups. In the future, their international commitments should be more specific and measurable so that the implementation process is more accessible to monitor.

“Civil Society Groups and related stakeholders also need to be more actively involved in promoting accountability and transparency in implementing international anti-corruption commitments. This could take various forms, ranging from research and monitoring to strengthening the consolidation among fellow civil society groups. To further expand the anti-corruption support networks in the regions, civil society groups need to increase their knowledge and capacity to monitor international anti-corruption commitments.”

OVERVIEW

This table summarises the progress that the government of Indonesia has made on delivering commitments from the Summit, across six themes, since 2016.

The commitments listed here are taken from Indonesia's country statement, which includes other commitments across different themes⁵⁰.

⁵⁰ Indonesia Anti-Corruption Summit Country Statement (May 2016) https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/522708/Indonesia.pdf

Theme	Focus Issue	Summit Commitment	Status
Asset Recovery	Accountable Repatriation	We commit to participate in the second review cycle of the implementation of Chapter V on Asset Recovery of the United Nations Convention Against Corruption.	Complete
Asset Recovery	Compensation	We will develop common principles governing the payment of compensation to the countries affected, to ensure that such payments are made safely, fairly and in a transparent manner, under the framework of UNCAC.	Ongoing
Asset Recovery	International Cooperation	We will afford one another the widest measures of cooperation and assistance in asset recovery	Ongoing
Asset Recovery	StAR	We commit to strengthen the Stolen Asset Recovery Initiative (StAR) in support of countries' efforts to recover and return stolen assets	Ongoing
Beneficial Ownership	Information collection, sharing, availability	We commit to improving the transparency of the beneficial ownership of legal persons and legal arrangements to prevent misuse of these entities and arrangements for corruption, tax evasion, terrorist financing and money laundering.	Ongoing
Beneficial Ownership	Public Register	We commit to exploring the establishment of public central registers of company beneficial ownership information	Ongoing
Open Data	G20 Open Data Principles	We will work toward the full implementation of the G20 Anti-Corruption Open Data Principles.	Ongoing
Public Procurement	Debarment Database	We commit to strengthen central databases of public contracting companies with final convictions.	Complete
Public Procurement	Transparency and Integrity	We will work toward the full implementation of the principles of the G20 Principles for Promoting Integrity in Public Procurement and the relevant provisions in United Nations Convention Against Corruption.	Ongoing
Whistleblower/ Civil Society Space Protection	Protecting Whistleblowers	We commit to strengthen whistle blower system and protect those who have provided information on corruption	Ongoing

JORDAN

Assessment by Rasheed (Transparency International Jordan):

Achievements

“There has been recent progress across three commitments: the establishment of an Innovation Hub, a pledge against tax evasion and integrity in sports.

“Thanks to fruitful collaborations with the Jordanian Integrity and Anti-Corruption Commission, stakeholders were introduced to all the commitments, and building ownership over each one of them provided new opportunities for fighting corruption in Jordan.”

Challenges

- Right after the Summit and until we started monitoring, the main government stakeholders did not have any knowledge of the 2016 Summit commitments.
- The stakeholders and civil servants lacked knowledge and familiarity with the concepts related to the commitments, such as beneficial ownership transparency.
- Key stakeholders did not immediately recognise the importance or the impact of implementing the commitments.

Recommendations

The Jordanian Government should initiate:

- Access to information as an indicator of government transparency.
- Integration, collaboration and communication between government institutions.
- Inclusion and engagement of civil society organisations by official parties when implementing global standards, and generally an enabling environment for civil society.
- Freedom of speech and expression in Jordan when evaluating the commitments.
- Monitoring of international agreements and human rights covenants, such as the UNCAC

Jordan Anti-Corruption Pledge Tracker:

<http://the8stracker.org/>

OVERVIEW

This table summarises the progress that the government of Jordan has made on delivering commitments from the Summit, across six themes, since 2016.

The commitments listed here are taken from Jordan’s country statement, which includes other commitments across different themes⁵¹.

Theme	Focus Issue	Summit Commitment	Status
Asset Recovery	Compensation	Jordan will develop common principles governing the payment of compensation to the countries affected, to ensure that such payments are made safely, fairly and in a transparent manner.	Ongoing
Asset Recovery	Legislation	Jordan commit to strengthen their asset recovery legislation, including through non-conviction based confiscation powers and the introduction of unexplained wealth orders.	Ongoing
Beneficial Ownership	Property and Public Contracting	Jordan welcomes the “establishment of transparent central registers of foreign companies bidding on public contracts and buying property, and intend to explore options for taking similar action.”	Ongoing
Beneficial Ownership	Public Register	Jordan commit to exploring public central registers of company beneficial ownership information.	Ongoing
Public Procurement	Corrupt Bidders	Jordan commit to exploring ways of sharing information on corrupt bidders across borders	Ongoing

⁵¹ Jordan Anti-Corruption Summit Country Statement (May 2016) https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/523061/Jordan.pdf

KENYA

Assessment by Transparency International Kenya:

Achievements

“The key achievement of this process has been the ease of identification of key priority areas for reform as shared by government. This made it easier to identify advocacy areas, such as commitments around beneficial ownership transparency, and publication of procurement information, among others.”

- The country should have a monitoring mechanism by the agency / department making the commitments that also includes input from non-state actors
- Government should publicise the commitments via circulars or similar mechanisms to government agencies, coupled with other dissemination mechanisms targeted at the general public. This could be spearheaded by the Department of Justice.”

Kenya Anti-Corruption Pledge Tracker:
www.pledgetracker.tikenya.org

Challenges

“The main challenges in monitoring these pledges has been the lack of publicly available information on the progress of the commitments, as well as the low awareness of the commitments among the relevant government agencies in charge of implementing them.”

Recommendations

“Some key recommendations stemming from this initiative are:

OVERVIEW

This table summarises the progress that the government of Kenya has made on delivering commitments from the Summit, across six themes, since 2016.

The commitments listed here are taken from Kenya’s country statement, which includes other commitments across different themes⁵².

Theme	Focus Issue	Summit Commitment	Status
Asset Recovery	Accountable Repatriation	Kenya commits to strengthening her asset recovery legislation and to strengthening capacities to undertake civil assets recovery. Kenya supports the development of internationally-endorsed guidelines for the transparent and accountable management of returned stolen assets	Ongoing
Beneficial Ownership	Access to Domestic Law Enforcement	Kenya commits to ensuring that international and domestic law enforcement agencies have full and effective access to beneficial ownership information for companies and other legal entities registered within their jurisdiction	Ongoing
Beneficial Ownership	Access to International Law Enforcement	Kenya commits to ensuring that international and domestic law enforcement agencies have full and effective access to beneficial ownership information for companies and other legal entities registered within their jurisdiction	Ongoing
Beneficial Ownership	Property and Public Contracting	Kenya welcomes the establishment of transparent central registers of foreign and local companies bidding on public contracts and buying property, and will pursue options for taking similar action	Ongoing
Beneficial Ownership	Public Register	Kenya will take measures in line with her new Companies regulatory framework to establish public central registers of company beneficial ownership information	Ongoing

⁵² Kenya Anti-Corruption Summit Country Statement (May 2016) https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/522719/Kenya.pdf

Theme	Focus Issue	Summit Commitment	Status
Law Enforcement	International Anti-Corruption Coordination Centre	Kenya offers to host the African Anti-Corruption Law Enforcement Coordination Centre	No Data
Law Enforcement	International Anti-Corruption Coordination Centre	Kenya supports the setting up of international mechanisms, to facilitate better coordination of anti-corruption law enforcement efforts and welcomes the establishment of an International Anti-Corruption Law Enforcement Coordination Centre and will work closely and cooperate with it and relevant international organizations	Inactive
Public Procurement	Debarment Database	Kenya commits to establishing accessible central databases of companies and individuals convicted of bribery and corrupt practices and to exploring ways of sharing information on corrupt bidders across borders	Inactive

MEXICO

Assessment by Transparencia Mexicana:

Achievements

“In contrast to conventions and other international commitments, the design of the London’s Summit commitments and the immediate release of its monitoring platform opened up the space for a continued dialogue on monitoring and evaluation with Government officials.”

“Tracking the London Anti-Corruption Summit commitments in a periodic way through the Anti-Corruption Pledge Tracker has made it possible to monitor individual and concrete advances or setbacks twice a year since 2016.”

“In this sense, tracking international commitments helps to understand how Mexico is doing in certain anti-corruption issues, tools and actions objectively. This has led to focus on improving the nature, scope and effects of new commitments in other agendas. It could be considered a good practice for international summits to circumscribe a complex topic such as corruption into a clear and focused number of commitments for a certain period of time in order to foster their impact and its independent monitoring.”

Challenges

“One of the challenges is the dispersion of relevant information through different autonomous and federal agencies. The relevance, opportunity and format of the available information are correlated issues. In general, the anti-corruption commitments of Mexico depend on different agencies, which

need to be coordinated in order to make advancements and to report these, either through the official monitoring mechanism or to the public. However, the information has not been placed in one single platform or agency in Mexico. This leads to a fragmentation of the information, and the multiplicity of timeframes, indicators and sources in order to establish the status of every commitment.”

Recommendations

“International conventions and commitments are a blueprint of what countries should do in order to advance anti-corruption agendas. If the information is dispersed and it is not well communicated, the governmental agencies will not be as coordinated as they should be in order to take effective action.”

“This is also a challenge for governments themselves, as these national commitments require coordination among executive branch agencies, autonomous bodies and even, for cases like Mexico, a federation, subnational reporting including states. In this sense, it is necessary to understand, classify and publish all the information related to international anti-corruption commitments in an accessible way and therefore we suggest that every new commitment includes clear guidelines on the way information and indicators have to be gathered and publicised.”

Mexico Anti-Corruption Pledge Tracker:
<https://promesasanticorrupcion.tm.org.mx/>

OVERVIEW

This table summarises the progress that the government of Mexico has made on delivering commitments from the Summit, across six themes, since 2016.

The commitments listed here are taken from Mexico's country statement, which includes other commitments across different themes⁵³.

Theme	Focus Issue	Summit Commitment	Status
Asset Recovery	Asset Recovery Guidelines	We commit to develop internationally-endorsed guidelines for the transparent and accountable administration of returned assets	No Data
Asset Recovery	Compensation	We will develop common principles governing the payment of compensations by corruption offenders to the countries affected, ensuring that such payments are made safely, fairly and in a transparent manner	No Data
Beneficial Ownership	Access to Domestic Law Enforcement	We commit to promote that law enforcement agencies at the national/federal level, have full and effective access to beneficial ownership information for companies and other legal entities registered within their jurisdiction	Ongoing
Beneficial Ownership	Central Register	We commit to exploring interoperability of different databases regarding public contracts information and business registries	Ongoing
Beneficial Ownership	Property	We will take steps to ensure transparency of the ownership and control of all companies involved in property purchase and public contracting	Ongoing
Open Data	Open Data Charter	We commit to implement the International Open Data Charter and explore its Anti-Corruption Sector Package as a useful tool to promote greater coherence and collaboration among open data initiatives at a global scale	Ongoing
Open Data	Data Literacy	We commit to promote a data-driven culture in the public sector	Ongoing
Open Data	Data Literacy	We commit to promote coherent use of digital technologies across policy areas and levels of government in the fight against corruption	Ongoing
Open Data	G20 Open Data Principles	We commit to the implementation of the G20 Anti-Corruption Open Data Principles, the identification of best practices related to the use of Open Data to fight corruption and to the continuous work around Open Data in the G20 Anti-Corruption Working Group and its Action Plans	No Data
Public Procurement	Open Contracting Data Standard	We will work towards the implementation of the Open Contracting Data Standard on public procurement starting with major infrastructure projects as an early priority, including the new Mexico City International Airport, in accordance to Mexican regulations	Ongoing
Public Procurement	Transparency and Integrity	We will include the Principles for Integrity in Public Procurement into our national standard procedure	Complete
Public Procurement	Open Contracting	As a founding member of the Contracting 5 (C5), we support the implementation of Open Contracting as an effective monitoring tool to promote accountability and increase transparency worldwide by releasing structured, interoperable and reusable data around procurement's whole lifecycle, including planning, tendering, award, implementation and evaluation stages	Ongoing

⁵³ Mexico Anti-Corruption Summit Country Statement (May 2016) https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/522966/Mexico.pdf

Theme	Focus Issue	Summit Commitment	Status
Public Procurement	Debarment Database	We commit to establishing accessible databases of companies with final convictions	Ongoing
Public Procurement	Open Contracting	We will propose reforms to the federal regulatory framework related to public procurement in responsibility of the executive in order to promote the principles of Open Contracting to include the planning and execution stages	Inactive
Public Procurement	Open Contracting in Health	Recognizing the financial, economic and developmental importance of health and pharmaceutical procurement, we commit to explore the implementation open contracting in this sector, according to our national legislation, and with the support from international partners in implementing this commitment	Ongoing

NEW ZEALAND

Assessment by Transparency International New Zealand (TINZ):

Achievements

“Our continued pressure for more transparency around beneficial ownership of companies and trusts (through submissions, articles, events and direct advocacy to politicians and public servants) has added to the influence from international bodies and policy platforms to normalise more transparency on beneficial ownership. The debate has shifted over this time from ‘privacy’ and ‘commercial sensitivity’ towards openness, accountability and managing privacy as exceptions rather than the rule.

“We successfully lobbied, along with other organisations, for an OGP commitment on the publication of procurement data by the agency that has oversight of procurement. This has enabled us as a civil society organisation to analyse the available data, report on gaps, and recommend changes. This work is underway.

“We advocated strongly for a cross agency national anti-corruption strategy. This was a priority recommendation in our National Integrity Systems Assessment. There has been some movement on this over time, with funding for a cross agency work programme. Recent additional funding has been provided to the Serious Fraud Office to invigorate the programme as cross agency collaboration has proved to be very effective. Released Cabinet papers show awareness of the need for cross agency collaboration.

“The act of sitting down with officials to discuss commitments has led to further opportunities for engagement, and recognition of TINZ as a leading civil society organisation with expertise on

anti-corruption. This is proven by the additional engagement with TINZ on the UNCAC New Zealand review (TINZ was invited to comment on the draft country self-assessment). This has also opened up the possibility of more transparency and public participation around UNCAC reporting.”

Challenges

“Whilst enforcement agencies (such as IRD, the police, SFO) have more access to beneficial ownership information, there is more work to do to convince policy makers and government to see the value of making this information publicly available. We have seen a shift, but more direct advocacy is needed.

There has been some movement in the area of sporting integrity, but not enough.”

Recommendations

The New Zealand Government should create:

1. A publicly available register of the beneficial ownership of companies and trusts
2. A national anti-corruption strategy
3. Measurable targets for improving data quality; more transparency about procurement that is not included in the government open tendering system (such as all of government panel purchasing)”

OVERVIEW

This table summarises the progress that the government of New Zealand has made on delivering commitments from the Summit, across six themes, since 2016.

The commitments listed here are taken from New Zealand's country statement, which includes other commitments across different themes⁵⁴.

Theme	Focus Issue	Summit Commitment	Status
Asset Recovery	Asset Recovery Guidelines	New Zealand supports efforts to develop internationally-endorsed guidelines for the transparent and accountable management of returned stolen assets. New Zealand also supports the development of common principles governing the payment of compensation to countries affected by corruption, to ensure that such payments are made safely, fairly and in a transparent manner.	Ongoing
Beneficial Ownership	Access to International Law Enforcement	New Zealand will also continue to implement bilateral arrangements that will ensure law enforcement in one partner country has full and effective access to the beneficial ownership information of companies incorporated in the other partner country	Underway
Beneficial Ownership	Public Register	New Zealand commits to exploring the establishment of a public central register of company beneficial ownership information	Ongoing
Law Enforcement	International Anti-Corruption Coordination Centre	New Zealand will support the proposal to establish an International Anti-Corruption Law Enforcement Coordination Centre ('IACCC') by nominating a representative to the IACCC	Complete
Public Procurement	Debarment Database	New Zealand will explore establishing an accessible and central database of companies with final convictions for bribery and corruption offences, and ways of sharing information on corrupt bidders across borders	Complete
Public Procurement	Transparency and Integrity	New Zealand will continue and intensify efforts to develop procurement capability, including initiatives that safeguard integrity in the procurement process	Underway

⁵⁴ New Zealand Anti-Corruption Summit Country Statement (May 2016) https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/522722/New_Zealand.pdf

NIGERIA

Assessment by Civil Society Legislative and Advocacy Centre (CISLAC):

Achievements

“The tracker served specifically as a public, visual and veritable premise for engagements with the Government on its anti-corruption commitments, as well an educational and reference tool used by the public to get information on how the Government has fared in keeping up with the commitments.”

“The tracker also contributed to compelling the political will that has led to the introduction of several reforms including the eventual requirement for the disclosure of persons with significant interests in a company in a beneficial ownership register, through to the enactment of the Companies and Allied Matters Act, 2020 on the 7th of August 2020⁵⁵.

“Furthermore, it has provided a strong repository base for the public to access and assess information on government actions and inactions towards the anti-corruption agenda and thus a means to credibly inform advocacy and demands for accountability.”

Challenges

“There is difficulty in directly getting information on progress from state actors as well as the absence of public information on reforms claimed to have taken place. The confidentiality of some information reduces the available data that can be satisfactorily provided periodically in the updates on the tracker.

“The effect of the COVID-19 crisis, and the corresponding lockdown period had a negative effect on almost the entire implementation process of the OGP activities. This resulted in the corresponding inaccessibility of the respective public office holders and the information that should have come out of their periodic review exercises.”

Recommendations

- Political will is needed to sincerely support Open Data implementation.
- Political will is heavily dependent on sustained advocacy by citizens, which in itself is informed by sensitization and awareness campaigns. “

Nigeria Anti-Corruption Pledge Tracker:

<https://tracnigeria.ng/>

OVERVIEW

This table summarises the progress that the government of Nigeria has made on delivering commitments from the Summit, across six themes, since 2016.

The commitments listed here are taken from Nigeria’s country statement, which includes other commitments across different themes⁵⁶

Theme	Focus Issue	Summit Commitment	Status
Asset Recovery	Asset Recovery Guidelines	We commit to developing internationally endorsed guidelines for the transparent and accountable management of returned stolen assets	Inactive
Asset Recovery	Legislation	We commit to the strengthening of our asset recovery legislation, including through non-conviction based confiscation powers and the introduction of unexplained wealth orders	Underway
Beneficial Ownership	Automatic Exchange of Information	We commit to joining the pilot initiative for automatic exchange of beneficial information	Ongoing

⁵⁵ <https://www.vanguardngr.com/2020/08/buhari-signs-amended-companies-and-allied-matters-bill-cama-2020/>

⁵⁶ Nigeria Anti-Corruption Summit Country Statement (May 2016) https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/523799/NIGERIA_FINAL_COUNTRY_STATEMENT-UK_SUMMIT.pdf

Theme	Focus Issue	Summit Commitment	Status
Beneficial Ownership	Public Register	Nigeria is committed to establishing a public central register of company beneficial ownership information. (The President of Nigeria has presented a draft Money Laundering Prevention and Prohibition Bill to the National Assembly in February, 2016. This Bill has defined Beneficial Ownership in line with FATF standards)	Ongoing
Beneficial Ownership	Property	Nigeria will establish a transparent central register of foreign companies bidding on public contracts and buying property	Ongoing
Beneficial Ownership	Access to International Law Enforcement	We are committed to implementing bilateral arrangements that will ensure law enforcement in one partner country has full and effective access to the beneficial ownership information of companies incorporated in the other partner country	Ongoing
Beneficial Ownership	Property	We are taking steps to ensure transparency of the ownership and control of all companies involved in property purchase and public contracting. Nigeria is already collating this information through the Extractive Industry Initiative process and would extend it to other sectors	Ongoing
Law Enforcement	International Anti-Corruption Coordination Centre	We support the establishment of an International Anti-Corruption Coordination Center [sic] to be managed by National Crimes [sic] Agency, UK. We will work with NCA in promoting this centre in the African region	Inactive
Public Procurement	Open Contracting in Health	We will apply the Open Contracting Data Standard to the following major projects – Building of Health Centers [sic] and Improvement of Health Services	Ongoing
Public Procurement	Open Contracting Data Standard	We will work towards full implementation of the principles of the Open Contracting Data Standard, focusing on major projects as an early priority. We will apply the Open Contracting Data Standard to the following major projects – (i) Development of Refineries in the oil Sector; (ii) Building of Health Centers [sic] and Improvement of Health Services; (iii) Building of Roads and other Infrastructures; (iv) Building of Schools and Improving Transparency in the Management of Education Funds and (v) Investment in the Power Sector	Ongoing

RUSSIA

Assessment by Transparency International Russia:

Achievements

“We believe the main achievements are related to mutual information exchange, specifically mutual tax information exchange under the OECD treaties, and the increased openness of tax information in relation to the amount of employees in a legal entity and the amount of paid taxes, among others.

“In addition, Russian authorities have drastically increased the amount of mutual legal assistance (MLA) requests in anti-corruption cases, but there are no open, systematic, statistics.”

Challenges

“It was very hard to find any statistics on MLA, beneficial ownership, competence of relevant authorities and other developments.

“We found that many authorities did not have any statistics on anti-corruption, therefore it is not clear how they were able to track compliance with the pledges.

“We have communicated with officials only via official mail, and it appears that they are not actually willing to discuss these pledges, not even sharing information on how they evaluate the pledges.”

Recommendations

“The Government intends to cease providing information related to state companies, and this undermines the pledges on open data. The Government must stop this process, as this drastically increases corruption risks because of a lack of transparency.”

OVERVIEW

This table summarises the progress that the government of Russia has made on delivering commitments from the Summit, across six themes, since 2016.

The commitments listed here are taken from Russia’s country statement, which includes other commitments across different themes⁵⁷.

Theme	Focus Issue	Summit Commitment	Status
Asset Recovery	Accountable Repatriation	We will ensure availability of national competent authority for detection, seizure and return of corrupt assets from foreign jurisdictions	Ongoing
Asset Recovery	Accountable Repatriation	We will extend the use of international cooperation mechanisms for detection, seizure and return of corrupt assets from foreign jurisdictions	Ongoing
Beneficial Ownership	Access to Domestic Law Enforcement	We commit to ensuring that national law enforcement agencies and financial intelligence unit have full and effective access to beneficial ownership information for companies and other legal entities registered within their jurisdiction	Inactive
Beneficial Ownership	Access to International Law Enforcement	We commit to implement bilateral arrangements that will ensure law enforcement and financial intelligence units in one partner country has full and effective access to the beneficial ownership information of companies incorporated in the other partner country	No Data
Beneficial Ownership	Public Contracting	We will take steps to ensure transparency of the beneficial ownership of all companies involved in public contracting.	Inactive
Open Data	Open Data Charter	We will implement the principles of the Open Data Charter	Inactive

⁵⁷ Russia Anti-Corruption Summit Country Statement https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/522727/Russian_Federation.pdf

SOUTH KOREA

Assessment by Transparency International Korea (TI Korea):

Achievements

“The main achievement from tracking the anti-corruption commitments made at the 2016 Anti-Corruption Summit has been the voice and pressure of civil society to raise global standards, which became an important driving force. In addition, the positive cooperation of some government departments, such as the Anti-Corruption and Civil Rights Commission, was considerably helpful.

Challenges

“One key challenge is that many government departments are indifferent to these commitments.

Recommendations

“In order to adopt international standards in the Republic of Korea, active efforts from the Government and political sectors are strongly required.

“In particular, the commitments of Korea submitted to various international organisations and the commitments of the global organisations in which the Government participated in the decision-making processes should be carried out.

“Next, a proactive effort from the wider political arena to introduce relevant laws that meet international standards is necessary. Efforts are also required to expand the substantial participation of civil society in these processes.”

OVERVIEW

This table summarises the progress that the government of South Korea has made on delivering commitments from the Summit, across six themes, since 2016.

The commitments listed here are taken from South Korea's country statement, which includes other commitments across different themes⁵⁸.

Theme	Focus Issue	Summit Commitment	Status
Asset Recovery	Legislation	We commit to strengthen our asset recovery legislation, and support a broader use of regional asset recovery practitioners' network, such as ARIN-AP which Korea holds a role of Secretariat	Ongoing
Beneficial Ownership	Access to Domestic Law Enforcement	We commit to employ all available means to meet the FATF standards on beneficial ownership that may include law enforcement agencies have full and effective access to beneficial ownership information for companies and other legal entities	Ongoing
Public Procurement	Transparency and Integrity	We, with the Online E-Procurement System we have developed, commit to ensure transparency in public procurement	Ongoing
Whistleblower/ Civil Society Space Protection	Protecting Whistleblowers	We commit to provide adequate protection to those who report corruption by strictly applying the 'Act on anti-corruption and the Establishment and Operation of the Anti-Corruption and Civil Rights Commission' and the 'Act on the Protection of Public Interest Whistleblowers'	Ongoing

⁵⁸ Republic of Korea Anti-Corruption Summit Country Statement https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/522725/Republic_of_Korea.pdf

SPAIN

Assessment by Transparency International España:

Achievements

“Although the special section of the website of the Ministry of Justice regarding the monitoring of the London Summit commitments has not been updated since 2018, various institutions have continued to make progress in complying with the commitments that affect their areas of competence. The advances made in the prevention of money laundering and terrorism financing is one highlight. In this regard, bodies such as SEPBLAC, the Spanish Land Registries Bar and the General Council of Notaries have been keen to collaborate with TI-Spain. Even so, it is important to note that there are still important matters pending in this regard, as Spain has not yet transposed the fifth nor sixth EU Anti-Money Laundering Directives.

“Another important development in Spain has been the approval of Law 9/2017 on Public Sector Contracts, which transposes the European Parliament and Council Directives 2014/23 / EU and 2014 into the Spanish legal system, and the Organic Law 1/2019, which modifies Organic Law 10/1995 of the Criminal Code, to transpose Directives of the European Union in the financial and terrorism fields, and addresses international issues. This completes the regulation of corruption crimes in accordance with the guidelines of the Group of States Against Corruption (GRECO).”

Challenges

“The main challenges that we have encountered throughout the tracking in this period were:

- The lack of formation of a national government from December 20th, 2018, to October, 29th, 2019, which resulted in the absence of an interlocutor
- Despite the government being formed, we were unable to

identify the responsible entity for monitoring the London Commitments or the officials in charge of updating its respective website. We are still waiting for the Ministry’s response on this matter.

- The COVID-19 pandemic and resulting state of emergency also hindered the time to follow up on progress.”

Recommendations

The Spanish Government should:

- Appoint a person or committee in the Ministry of Justice to be responsible for monitoring the follow-up of the London Commitments and make their contact details available to the general public.
- Periodically update and review the special section of the website of the Ministry of Justice regarding the monitoring of the London Summit commitments
- Initiate greater coordination between the Ministry of Justice and other institutions and public administrations whose competences and responsibilities are included or affected by the commitments.
- Publish an annual report of the statistical information and main activities of the Office for Asset Recovery and Management (ORGA) with specific reference to the degree of compliance with its Action Plan (2018-2020).

OVERVIEW

This table summarises the progress that the government of Spain has made on delivering commitments from the Summit, across six themes, since 2016.

The commitments listed here are taken from Spain’s country statement, which includes other commitments across different themes⁵⁹.

Theme	Focus Issue	Summit Commitment	Status
Asset Recovery	Accountable Repatriation	Since last May 6, a central database of bank accounts is fully operational in Spain. Notwithstanding this significant improvement, Spain will continue its commitment to developing adequate tools to strengthen the ability to trace and recover stolen assets	Complete
Asset Recovery	Asset Recovery Guidelines	Spain supports the development of internationally-endorsed guidelines for the transparent and accountable management of returned stolen assets	No Data

⁵⁹ Spain Anti-Corruption Summit Country Statement https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/522730/Spain.pdf

Theme	Focus Issue	Summit Commitment	Status
Asset Recovery	Global Asset Recovery Forum	Spain is willing to participate in the Global Forum for Asset Recovery	Complete
Asset Recovery	Legislation	Spain commits to strictly enforce its asset recovery legislation, including through non-conviction based confiscation, extended confiscation and confiscation from a third party	Complete
Asset Recovery	Training and Assistance	Spain commits to fully develop the functions for which the Asset Recovery and Management Office was created so it becomes a pillar in the fight against crime	Complete
Beneficial Ownership	Access to Domestic Law Enforcement	Spain will continue its commitment to ensuring that financial intelligence unit, law enforcement agencies and tax agency have full and effective access to beneficial ownership information for companies and other legal entities registered in Spain	Complete
Beneficial Ownership	Access to International Law Enforcement	Spain is committed to ensure Spanish law enforcement authorities share the beneficial ownership information available in the Spanish central database with counterparts in third countries. We call other countries to follow an equivalent commitment in terms of sharing beneficial ownership information	Complete
Beneficial Ownership	Automatic Exchange of Information	As one of the signatories of the G5 initiative, Spain is fully committed in the development of the pilot initiative for automatic exchange of beneficial ownership information	Complete
Beneficial Ownership	Central Register	The Spanish land registry and registry of movable assets centralize all the information regarding the owners of the land, real estate or movable assets irrespective of the citizenship of the acquiring person. The combined use of this tool and the information available concerning the beneficial ownership information of every company buying one of these properties have proved to be a very useful tool. Spain welcomes the establishment of transparent central registers of foreign companies bidding on public contracts and buying property	Ongoing
Beneficial Ownership	Central Register	Spain will continue its commitment to achieve the highest level of transparency, currently guaranteed by the Spanish central register of company beneficial ownership information	Ongoing
Beneficial Ownership	Property & Public Contracting	Spain will take steps to ensure transparency of the ownership and control of all companies involved in property purchase and public contracting	Ongoing
Law Enforcement	International Anti-Corruption Coordination Centre	Spain welcomes the UK initiative to establish an independent International Anti-Corruption Coordination Centre (IACCC) and expresses its willingness to collaborate with this Centre, as well as the readiness of the Spanish law enforcement bodies to keep fighting grand corruption and boosting international cooperation	Inactive
Law Enforcement	Legislation	Spain commits to implement the robust provisions of the Penal Code in the fight against corruption	Ongoing
Public Procurement	Corrupt Bidders	Spain commits to exploring ways of sharing information on corrupt bidders across borders	No Data
Public Procurement	Transparency and Integrity	Spain will continue to promote maximum transparency in public procurement procedures, only limited by due respect to confidentiality obligations deriving from EU Law (in particular, relevant EU Directives)	Complete
Public Procurement	Transparency and Integrity	Spain will set up a governance scheme aimed at detecting non-compliance or problems of systemic character within the public procurement procedures. Results of this activity of surveillance and supervision will be properly disclosed	Complete

SRI LANKA

Assessment by Transparency International Sri Lanka (TI Sri Lanka):

Achievements

“One of the key successes that we have encountered is that by having the TI Sri Lanka national pledge tracker, we have been able to enhance transparency in terms of the commitments that have been made by our leaders. This in turn results in greater accountability as it allows the public to easily access and view the status of each commitment.”

“It allows stakeholders to closely follow the progress of each commitment and if it has been complied with, it also enables us to see the extent of the compliance.”

Challenges

“One of the main challenges that we have encountered in keeping the Pledge Tracker updated is the lack of publicly available information, even in terms of recent developments that have been made by the State or state institutions.

“There has also been a lack of proactive initiative by the State and institutional leadership on upholding these commitments which in turn leads to State institutions being less incentivized to take measures to better uphold these commitments.

“Overall, the pace at which changes are being made has been significantly slow throughout the year.”

Recommendations

“Having open data platforms by moving towards the digitalisation

of information is one of the key recommendations that Sri Lanka should consider. If state institutions move towards a paperless and more digitised system of recording information, it would result in greater transparency of information and greater ease of access. It would also enable a culture of proactive information disclosure.

“There also needs to be greater awareness of the risks of corruption, especially for the rural parts of the island. Specifically, in terms of acts such as the Victims and Witness Protection Act. Providing state institutions with more capacity building and knowledge sharing on the risks of corruption coupled with a strong commitment by the leaders of these institutions to stand against corruption, would in turn lead to a more proactive approach being taken by these institutions.

“Finally, it is recommended that all stakeholders, i.e. the state, the private sector, non-governmental organisations, civil society organisations and the general public are given the opportunity to participate and get more involved in the Government’s decision making processes.”

Sri Lanka Anti-Corruption Pledge Tracker:

<http://www.tracker.tisrilanka.org/>

OVERVIEW

This table summarises the progress that the government of Sri Lanka has made on delivering commitments from the Summit, across six themes, since 2016.

The commitments listed here are taken from Sri Lanka’s country statement, which includes other commitments across different themes⁶⁰.

Theme	Focus Issue	Summit Commitment	Status
Asset Recovery	International Cooperation	We will prioritise prosecutions of grand corruption and of money laundering and recovery of stolen assets	No Data
Whistleblower/Civil Society Space Protection	Protecting Whistleblowers	We will establish a proactive program of victims and witness protection	Ongoing

Other commitments being tracked

Theme	Focus Issue	Summit Commitment	Status
International Anti-Corruption Architecture	UNCAC Implementation	We will take measures to bring legal and administrative framework in line with UNCAC	Ongoing

⁶⁰ Sri Lanka Anti-Corruption Summit Country Statement https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/522731/Sri_Lanka.pdf

UKRAINE

Achievements

“Ukraine continues to use e-platform Prozorro for public tenders and extensively shares its experience with other countries. This platform, used for sales of public assets, privatization, and lease of property, among others, has saved more than USD 2.8 billion for the country’s budget⁶¹. Inspired by its example, Transparency International Ukraine worked with partners to develop Dozorro, a citizen monitoring platform.”

Challenges

“Even though Ukraine has progressed and is ahead of many other countries in terms of transparency, there are big problems with sustaining achieved reforms. Legislative initiatives or Constitutional Court appeals that aim to ruin the achievements in anti-corruption emerge frequently. On October 27, the Constitutional Court of Ukraine (CCU) deprived the National Agency on Corruption Prevention of much of their mandate⁶². We are awaiting the CCU decision on the constitutionality of the High Anti-Corruption Court.

“The “localisation” initiative that gives preferences to the local manufacturers in public procurement and at the same time violates Ukraine’s EU Association Agreement and WTO GPA is

being heavily pushed through the Parliament and the Cabinet.”

Recommendations

The Government of Ukraine should:

- Establish a verification mechanism for beneficial ownership that includes automatic cross-checking within the relevant national registries
- Launch the full judicial reform including the High Qualification Commission of Judges and High Council of Justice as well as the Constitutional Court.
- Establish transparent, impartial and non-politicised procedures for the selection, appointment and dismissal of the Anti-Corruption Bodies’ Heads.”

OVERVIEW

This table summarises the progress that the government of Ukraine has made on delivering commitments from the Summit, across six themes, since 2016.

The commitments listed here are taken from Ukraine’s country statement, which includes other commitments across different themes⁶³.

Theme	Focus Issue	Summit Commitment	Status
Asset Recovery	Global Asset Recovery Forum	To support victims, take further steps to improve asset recovery legislation, in particular implementing EU Directive 2014/42, operationalise the National Agency for Detection, Tracing and Management of Proceeds of Corruption and Other Crimes in 2017 and participate with others in the International Asset Recovery Forum 2017	Complete
Asset Recovery	Legislation	Improve asset recovery legislation, in particular implementing EU Directive 2014/42	Complete
Beneficial Ownership	Information collection, sharing, availability	Putting in place mechanisms to verify the accuracy of the Beneficial Ownership information provided by companies and enforce compliance with the obligation to submit this information by June of 2017	Ongoing
Beneficial Ownership	Access to International Law Enforcement	Committing to implement bilateral agreements that provide full and effective access for law enforcement agencies and financial intelligence units of a partner country to information on the final beneficiaries of the companies registered in the territory of another partner country	Inactive

⁶¹ http://www.xinhuanet.com/english/2019-02/23/c_137843304.htm

⁶² <https://nazk.gov.ua/en/news/duo-to-the-ccu-s-decision-the-inspections-of-prevention-of-corruption-in-the-state-agency-for-motor-roads-of-ukraine-ukravtodor-state-enterprise-national-nuclear-energy-generating-company-energoatom-a/>

⁶³ Ukraine Anti-Corruption Summit Country Statement (May 2016) https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/522853/Ukraine.pdf

Theme	Focus Issue	Summit Commitment	Status
Beneficial Ownership	Public Contracting	Punish corruption by preventing corrupt bidders and those who seek to hide their beneficial owners from accessing public contracts and procurement by establishing accessible central databases and address ways of sharing information on corrupt bidders across borders	Ongoing
Law Enforcement	International Anti-Corruption Coordination Centre	Welcoming to establish [sic] an International Anti-Corruption Law Enforcement Coordination Centre and expressing willingness to cooperate with it	Inactive
Public Procurement	Open Contracting	Protecting against and exposing misuse of public funds by continuing to make public procurement via e-platforms open by default to all, and sharing experiences by participating with Mexico and others in an international 'Contracting Group'	Ongoing

UNITED KINGDOM

Assessment by Transparency International UK:

Achievements

“One of the key successes of our commitment tracking work has been strong levels of engagement with HM Government – in particular the Joint Anti-Corruption Unit (JACU) – which has ensured an open dialogue between government and civil society on how the UK is delivering against its Summit commitments.

“An example of this success in practice is the UK’s development, publication and annual follow-up on its **Anti-Corruption Strategy 2017-2022**. This began as a Summit commitment to develop a cross-government anti-corruption strategy to “set out our long-term vision for tackling corruption, including how we will implement [Summit] commitments”. Although published a year later than planned, the Strategy sets out a vision containing 134 concrete actions for tackling corruption over a five-year period. So far, the Government has published two annual updates – one reflecting on progress in 2018, the other on 2019. This goes to show the longevity that concrete and ambitious commitments can have.”

Challenges

“Over the past three years, the main challenges to our UK advocacy have been related to major national political developments, including the decision to leave the European Union, changes in Prime Minister and senior ministers, and general elections. Parliamentarians in particular were preoccupied with these changes and the consequent debates, and related parliamentary activity. These changes also produced

repeated shifts in government priorities, which had a knock-on effect on the capacity of government officials to engage with and deliver on the UK’s anti-corruption commitments. More recently, the outbreak of Covid-19 has meant that both the government and legislature have focused significant efforts on a national response.

“The extent to which these issues serve to refocus national priorities highlights the need for civil society actors to continue to work with government, parliament and media to complete the delivery of the UK’s anti-corruption commitments, ensuring they move from words on paper to promises kept.”

Recommendations

“The UK has at times been seen as a leader in anti-corruption efforts, but this reputation is far from guaranteed. To grapple with the cross-cutting impact of corruption, the UK should deliver on its outstanding anti-corruption commitments, move forward with initiatives such as strengthening company ownership transparency and agreeing asset recovery principles, and ensure anti-corruption work is mainstreamed in all activities intended to enhance Britain’s contribution to the world.”

UK Anti-Corruption Pledge Tracker:
<http://ukanticorruptionpledgetracker.org/>

OVERVIEW

This table summarises the progress that the government of United Kingdom has made on delivering commitments from the Summit, across six themes, since 2016.

The commitments listed here are taken from the UK's country statement, which includes other commitments across different themes⁶⁴.

Theme	Focus Issue	Summit Commitment	Status
Asset Recovery	Legislation	The UK is consulting on stronger asset recovery legislation, including non-conviction based confiscation powers and the introduction of unexplained wealth orders	Complete
Asset Recovery	Global Asset Recovery Forum	The UK will work with others to establish a Global Forum for Asset Recovery and will provide resources to support it. We will co-host the inaugural meeting of the Global Forum with the United States of America in 2017, focusing on Nigeria, Ukraine, Tunisia and Sri Lanka	Complete
Beneficial Ownership	Public Register	The UK's public central register of company beneficial ownership information for all companies incorporated in the UK will be launched in June 2016	Complete
Beneficial Ownership	Property	The UK will also establish a public register of company beneficial ownership information for foreign companies who already own or buy property in the UK	Overdue
Beneficial Ownership	Public Contracting	Establish a public register of company beneficial ownership information for foreign companies who bid on UK central government contracts	Overdue
Law Enforcement	International Anti-Corruption Coordination Centre	The UK will work with others to establish an International Anti-Corruption Coordination Centre and will provide people and resources to support it	Complete
Public Procurement	Open Contracting Data Standard	The UK Crown Commercial Service will implement the Open Contracting Data Standard by October 2016. The UK is trialling the principles of this Standard in High Speed Two (HS2). The UK will join the new Contracting 5 group to promote open contracting globally	Complete
Public Procurement	Corrupt Bidders	The UK will introduce a conviction check process to prevent corrupt bidders with relevant convictions from winning public contracts, and is committed to exploring ways of sharing such information across borders	Overdue
Whistleblower/ Civil Society Space Protection	Protecting Whistleblowers	The UK is committed to providing effective protections for whistleblowers and made recent legislative changes to make the system more transparent. The UK will review the effectiveness of these changes	Overdue

⁶⁴ UK Anti-Corruption Summit Country Statement (May 2016) https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/522749/United_Kingdom.pdf

COLLABORATION AND LEARNING

Government participation in international events is not enough on its own to achieve progress. The way in which commitments are written and flow down to the national level, generating reinforcing action through complementary initiatives, and advocating internationally through multiple fora is crucial to strengthen the quality and quantity of commitment implementation.

Drafting commitments

As we have noted in previous reports, elaborating implementable commitments also requires drafting clear, ambitious and specific content that is embedded in the country or the international organisation's context.

Ambitious commitments: When governments make ambitious commitments, these are the most likely to have been implemented. Detailing specific areas for reform and including ambitious endeavors appears to help achieve the necessary resolve to ensure that the promise is achieved.

Concrete commitments: The more 'concrete' a commitment is, the more likely it is to have been enacted. Clear, specific sentences with words denoting action, deadlines, timeframes should be used. Ideally the commitment should be presented with a set deadline or timeframe and detail the relevant body or agency responsible for implementation.

Mirroring contexts and ensuring the 'implementability' of a commitment: It is crucial that those making promises consult with local experts before committing to any initiatives that might not be feasible to implement, as in the case of commitments related to Innovation or Anti-Corruption Hubs made by some countries and international organisations, which ultimately were deemed not feasible. Promises related to developing legislation that does not correspond with that of certain jurisdictions is another example of the importance of studying whether certain commitments can be implemented before pledges are made.

Joining forces with complementary initiatives

Linking different initiatives into a mainstreamed platform for action is not only a positive step towards implementation, but it can also strengthen the process through the associated technical support and feedback loops that offers.

For example, our analysis on the overlap of Summit and Open Government Partnership National Action Plans (NAPs) showed that at least 165 Summit pledges were relevant to OGP NAPs. Of these 35% had already been included in National Action Plans.

Combining different, related initiatives can lead to stronger implementation of anti-corruption commitments, as the process is overseen by multiple stakeholders and benefits from the weight of several actors pushing for implementation.

Advocating at international fora

Advocating at international fora for the advancement of key anti-corruption reforms is an important way to set standards that can then flow down and adapt to local contexts. It is also a crucial way to show a united international front and display the strength of a wave of countries and institutions willing to push for the same reforms. On top of that, it generates a constructive competition and represents an opportunity for regional leadership, by giving a chance to wider range of countries to be the first to advance anti-corruption reform in certain areas..

Recommendations

If political will is evident in ambitious and concrete commitments, which are implementable in the countries and international organisations' own contexts and frameworks, and embedded into multiple accountability processes, there will be a greater chance of anti-corruption summit pledges being put into action.

International advocacy reinforces this pattern by promoting global standards that others can follow and adapt to their context, generating competition and peer pressure, as well as leading national reform. Together, these can contribute to stronger implementation of anti-corruption commitments.

ADVOCATING LOCALLY: A HOLISTIC APPROACH

On top of pushing for concrete and ambitious commitments, interlinking different initiatives, and advocating at a global level, we have found local advocacy strategies to be extremely effective for high-quality, context-grounded reform.

The ability of local advocates to adapt their strategies depending on the needs for reform and stakeholders' incentives is what makes local advocacy effective. Advocating means much more than just tracking – from supporting governments in policymaking, consulting in drafting complex legislation, and supporting commissions and departments to work better, to improving public services and increasing transparency (through online platforms). It can also extend to generating awareness through education, the arts, technology and journalism, or upskilling communities to report corruption or have their say in governmental initiatives, such as national anti-corruption strategies.

This flexibility has helped Transparency International partners to develop key partnerships and spearhead pivotal reforms: passing asset recovery and beneficial ownership regulations in Afghanistan, securing the Prime Minister's endorsement of key reforms in public procurement and beneficial ownership in Jordan at the beginning of 2020, generating awareness of how to report corruption in South Africa, and supporting investigative journalists, whistleblowers and victims of corruption in Sri Lanka.

Some lessons learnt by partners have been key to this success.

Firstly, by building credibility and relationships with key stakeholders, and through evidence-based advice, they have ensured that trust is gained, helping to secure a welcome for their suggested reforms to legislation. Similarly, collaboration on making existing systems and legislation work, as in the case of Sri Lanka and the Witnesses and Victims Protection Authority, can form the basis for better implementation of commitments.

Some examples

Corruption Watch's work in South Africa highlights the crucial role of civil society in including citizens in key national processes. By conducting consultative processes for the national anti-corruption strategy, they have empowered citizens and generated anti-corruption measures that are grounded in reality and based on citizens' concerns.



In Jordan, tracking commitments spurred a comprehensive monitoring process in collaboration with government agencies, thanks to which detailed metrics for successful anti-corruption reform were developed. This action plan is now being used by the government and civil society to jointly deliver on the commitments.





The anti-corruption sector is full of jargon and technical language, which tends to alienate stakeholders and the public. Civil society can bridge this divide by applying creative tools to increase awareness of the issues of corruption to the wider population. For example, Transparency International Sri Lanka held a screenplay competition based on everyday corruption themes affecting the country. The main purpose was to bring people closer to this topic and encourage them to reflect on how corruption affects them on a daily basis.



The process of building civil society coalitions to apply pressure for reform and improve the quality of implementation is also crucial. In Afghanistan, Integrity Watch, a Transparency International partner on this project, mobilised over 20 actors from civil society to advocate for an anti-corruption law and, as a result, to create an independent anti-corruption commission. This was important for civil society to ensure anti-corruption agencies are legally independent and effective, as well as meeting global standards and in line with the UNCAC.

Also, in the case of the United Kingdom, providing technical recommendations that can foster conversation and constructive feedback has been a key step to maintain momentum and not fall into a lazy critique. Focusing on problems alone does not necessarily move the discussion forward; providing informed solutions nurtures engagement.

Through this initiative, civil society around the world has been empowered to engage with the government on anti-corruption reform that would have otherwise been forgotten.

Recent challenges and recommendations

Crises such as the COVID-19 pandemic clearly affect the way in which advocates can work to push for reform. Many in-person activities had to be cancelled, particularly those related to reaching and engaging with the most vulnerable groups. Several long term reforms have been postponed in favour of reacting to the emergency. This is in addition to more predictable risks such as changes in government or failing willingness of politicians to act, which can jeopardise the progress achieved over previous years.

Although these risks are difficult to navigate, advocates can sometimes overcome stalemate through a mix of approaches:

- **Focus on solutions rather than problems** Civil society can act as the bridge between an issue seemingly impossible to solve and overcoming it. By using evidence and suggesting specific recommendations, advocates can ease processes and become trusted partners for change.

- **Be strategic in demands on the timing of reforms.**

Understanding how government processes are set out is crucial for advocacy. It is not worth pushing for reform when there is a fire to put out elsewhere. Rather, wait and plan for the right moment.

- **There are numerous ways in which an advocate can push for implementation from the one specific pledge.**

As was seen in the case of South Africa, advocates can turn a single, unambitious, commitment into a plethora of initiatives. From the promise made in 2016 to develop a national anti-corruption strategy, over the past four years they managed to plan for a national consultation to include citizens in the drafting process, secure a higher quality document, embed international standards into the national implementation and include in the plan the setup of a whistleblower agency. One commitment could lead to multiple paths for reform even if at first it seems limited in scope. Through creative strategies, advocates should be agile enough to work with changing contexts.

RECOMMENDATIONS FOR THE FUTURE



Several valuable lessons have been learnt from these past years, monitoring and advocating for the implementation of Summit commitments. This report shares practical examples of the benefits of this work.

1. The way that commitments are formulated impacts on how achievable they are and the determination to make them a reality. **Pledges need to be concrete, ambitious and time-bound, and identify public bodies that will be responsible for delivery.** Vague and non-binding commitments have hindered accountability efforts and create more opportunities for governments to shape results in whatever way they wish, often not up to global standards. Guidelines for creating ambitious commitments are not only important for governments in refining pledges before embarking on the implementation process. They also offer a tool for civil society to call out weak pledges that have only been made for good publicity and smooth relations. Getting this right from the start can prevent unnecessary waste of resources and time on delivering or monitoring uncertain pledges.
2. **Governments' efforts to deliver on their commitments often increase as their awareness of being monitored grows.** Therein lies the importance of this initiative. This also highlights the common problem of there not being an established role or organisation to track implementation.
3. **International advocacy is critical in order to demonstrate examples of success and hold governments to account when national action is not enough or when civil society is inhibited or under threat.** A clear vision and global momentum behind developing international standards can positively influence progress in individual countries. The relatively recent focus on dirty money and the importance of company beneficial ownership transparency is an example of this.
4. **Pledge tracking is also valuable for its fostering of engagement with stakeholders.** Often, when pledges are made at a high level, departments responsible for them are not made aware, resulting in an absence of implementation. The small act of engaging in a conversation with the government can have decisive impact, and it is far from the norm. Furthermore, recognising those responsible for implementation creates a positive incentive to see reforms through to completion.
5. Monitoring pledges and connecting with work in related fora is only half the work. **Local civil society groups are needed to develop robust advocacy strategies whereby pushing for reform is combined with creative initiatives,** such as providing technical support or acting as the linkage between the government and citizens. These incremental, long term processes are steady facilitators of change.

Ultimately, the role of civil society in pushing for anti-corruption interventions is key. **International advocacy, coupled with local strategies to promote reform in the national context, ensure that commitments are not forgotten.**

ANNEX – ORGANISATIONS MONITORING COMMITMENTS

Afghanistan	Integrity Watch Afghanistan
Australia	Transparency International Australia
Brazil	Transparência Internacional Brasil
Bulgaria	Transparency International Bulgaria
France	Transparency International France
Georgia	Transparency International Georgia
Ghana	Ghana Integrity Initiative
Indonesia	Transparency International Indonesia
Jordan	Rasheed
Kenya	Transparency International Kenya
Mexico	Transparencia Mexicana
Nigeria	Civil Society Legislative Advocacy Centre
South Korea	Transparency International Korea
Russia	Transparency International Russia
South Africa	Corruption Watch
Spain	Transparency International España
Sri Lanka	Transparency International Sri Lanka
UK	Transparency International UK
Ukraine	Transparency International Ukraine

