

FIGHTING CORRUPTION: AN AGENDA FOR 2021



From the halls of Westminster to the offices of Whitehall, the City's skyscrapers to the rigs of the North Sea, opportunities for corruption lurk wherever money meets power.

Corruption is not a victimless crime. It has a devastating impact on democracy, human rights, security, and prosperity in countries around the world—and the UK is not immune to it.

The perception of corruption can be corrosive for a government's reputation, and the Covid-19 pandemic response has heightened public concerns about how public money is spent and the transparency and accountability of decision-making. Rebuilding trust and embedding integrity is essential as we look to build back better from the pandemic. This means creating a strong and accountable democracy which is protected from malign influence, whether foreign interference, the excessive sway of big money, or cronyism.

This year, the UK also has a unique responsibility and role to play in the global fight against corruption. Our presidencies of the G7 and COP26, and UN Security Council seat, provide the perfect platform to show leadership on this issue alongside the Biden administration, but this must be underpinned by action to address both corruption at home and the UK's oversized role as a destination of choice for stolen wealth. By protecting open societies, ensuring the integrity of initiatives to fight climate change, and fighting kleptocracy, Britain truly can be a force for good in the world.

This agenda for action outlines how the UK can both tackle corruption here at home and its role in facilitating corruption abroad. To clean up politics, safeguard our economy, and protect the environment, we call on the government to:

Tackle corruption here in the UK by:

- ① Protecting the public purse through fair, effective, and transparent public procurement.
- ② Strengthening democracy by cleaning up politics and raising standards in public life.
- ③ Building trust in government through openness, transparency, and accountability.

Address Britain's role in facilitating corruption abroad by:

- ① Leading by example in the global fight against corruption.
- ② Ending the UK's role as a safe haven for kleptocrats' dirty money.
- ③ Driving transparency, accountability, and sustainability in the extractives sector.

We make five key recommendations for each of these topics below, with more information available on our website and through our co-ordinator.

PROTECT THE PUBLIC PURSE THROUGH FAIR, EFFECTIVE, AND TRANSPARENT PUBLIC PROCUREMENT

- Fully implement and resource the UK's new Green Paper vision on Transforming Public Procurement, ensuring that transparency, effective regulation of **conflicts of interest**, debarment for fraudulent and corrupt actors, and **public access to complaints** are embedded in the new post-Brexit procurement rules.
- Implement the **Open Contracting Data Standard** across public procurement to ensure full transparency.
- Introduce an **effective debarment regime** by building central and properly resourced expertise for assessing evidence of wrongdoing, with access to information sharing on foreign contractors.
- Amend the Freedom of Information Act to cover **information held by contractors** providing public goods and services.
- Publish information on contracts awarded through the **high-priority lane**, and conduct a full, expert-led public **review of under-performing contracts and lessons learned** from emergency procurement during the pandemic.

[Learn more here](#)

STRENGTHEN DEMOCRACY BY CLEANING UP POLITICS AND RAISING STANDARDS IN PUBLIC LIFE

- Protect the integrity of elections by bringing in tighter transparency and accountability controls on who can make **political donations**, how much can be donated, and **online campaigning**.
- Introduce a **statutory public register of lobbyists** that covers both in-house and consultant lobbyists, provides sufficient detail on meetings between lobbyists and key decision-makers, and **publishes information publicly**, in a timely manner and in publicly accessible formats.
- Establish a centralised function to publicly **record and manage conflicts of interest in government**, and make this available to all key stakeholders.
- Overhaul the UK's patchwork system for **standards governance** and introduce a **'corruption in public office' offence** to ensure there are meaningful sanctions for those who egregiously break the law.
- Protect the **independence of the media and judiciary**.

[Learn more here](#)

BUILD TRUST IN GOVERNMENT THROUGH OPENNESS, TRANSPARENCY, AND ACCOUNTABILITY

- Ensure **public authority compliance with Freedom of Information (FOI) Act** requests by introducing strict statutory limits on the length of time taken to answer requests or reconsider decisions, and strengthening sanctions against those who deliberately destroy information.
- Properly **resource the Information Commissioner's Office (ICO)** to carry out its FOI work, which should include monitoring, investigating underperforming authorities, and using enforcement notices to tackle systemic non-compliance.
- Fully engage civil society in the creation of a **new National Action Plan** for the Open Government Partnership.
- **Develop the evidence base** to close knowledge gaps and promote evidence-based policy making on corruption, as outlined in the National Anti-Corruption Strategy.
- Bring forward a new law that ensures safe and **effective whistleblowing arrangements** for larger employers.

[Learn more here](#)

LEADING BY EXAMPLE IN THE GLOBAL FIGHT AGAINST CORRUPTION

- Promote **anti-corruption measures at the G7 and COP26**, with a particular focus on the need for corporate, extractives, and procurement transparency.
- Include robust **anti-corruption provisions in Britain's Free Trade Agreements**, to defend British businesses, infra-structure, and services from corrupt and fraudulent actors.
- Ensure that the **new anti-corruption sanctions regime** is ambitious, targets senior politicians with assets in the UK, and has strong oversight built in through an independent panel of experts.
- Continue to encourage the UK's **Overseas Territories to implement beneficial ownership registers** by the 2023 deadline.
- Facilitate the **accountable return of stolen assets**, and ensure that full statements on returns, disaggregated data on corruption related returns, and relevant court documents are in the public domain.

[Learn more here](#)

ENDING THE UK'S ROLE AS A SAFE HAVEN FOR KLEPTOCRATS' DIRTY MONEY

- Stop the abuse of UK companies for economic crime by legislating for proposed **Companies House reforms**, which will strengthen its ability to monitor, verify, and investigate suspicious companies.
- Ensure parliamentary time for the **Register of Overseas Entities Bill** to create a register of foreign companies owning UK property and protect the UK's property market.
- Reform the UK's **outdated corporate liability laws**, including the identification doctrine, and introduce a failure to prevent economic crime offence to ensure that all companies can be held to account for corruption, money laundering, and fraud.
- Comprehensively **review the UK's Anti-Money Laundering regime** to ensure it is fit for purpose.
- Deliver the commitments made in the UK's **Economic Crime Plan**.

[Learn more here](#)

DRIVING TRANSPARENCY, ACCOUNTABILITY, AND SUSTAINABILITY IN THE EXTRACTIVES SECTOR

- Require British oil, gas and mining companies to **disclose payments to governments** for the purchase of producer states' publicly owned oil, gas and minerals (**"commodity trading"**) and champion this reform internationally.
- Strengthen the UK's **monitoring and enforcement of extractive companies' compliance** with mandatory reporting requirements under the Reports on Payments to Governments Regulations 2014.
- Redouble efforts to encourage international partner countries to introduce mandatory extractives transparency (reporting) laws and to **join the Extractive Industries Transparency Initiative (EITI)**.
- Support **improved producer-country governance standards**, including in supply chains, to reduce corruption, social and environmental risks arising from the surge in demand for clean energy transition minerals worldwide.
- In addressing the global climate crisis, **prioritise anti-corruption and accountable resource governance** as part of UK and global efforts to achieve a managed reduction in fossil fuel production.

[Learn more here](#)