



The Rt. Hon Dominic Raab MP
Foreign and Commonwealth Office
King Charles Street
London
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27 November 2020

Dear Foreign Secretary,

Urgent implementation of UN recommendations on corruption

We are writing to you as a coalition of anti-corruption civil society groups who have witnessed the devastating impact of corruption on democracy, national security and governance for local communities around the world. We have welcomed the leadership you have shown in introducing the Global Human Rights Sanctions regime and the commitment you have made to extend this to corruption.

We are writing now to note our real concern that the UK Government has yet to take concrete steps to implement key recommendations made by the UN in May 2019 to improve the UK's framework for preventing corruption in line with the UN Convention against Corruption (UNCAC).

The full publication of the UN's review of the UK, published last week, highlighted the lack of progress in implementing these recommendations, particularly with regards to Article 7 (Public Sector), Article 8 (Codes of Conduct for Public Officials), Article 9 (Public Procurement) and Article 12 (Private Sector).

In particular, the UN recommended that the UK should strengthen its mechanisms for analysing and mitigating risk around conflicts of interest and corruption in top executive functions by:

- Establishing a more centralized mechanism for managing conflicts of interest by ministers and senior civil servants;
- Strengthening the remit and powers of ACOBA (Advisory Council on Business Appointments);
- Reviewing the remit of the Independent Advisor on Minister's Interests, giving the Advisor greater powers to investigate;
- Broadening the scope of 'relevant interests' to be declared by Ministers and expanding the scope of the register of consultant lobbyists.

The issue of how conflicts of interest are handled in the UK has come to the fore with the release last week of the National Audit Office's report into emergency procurement. Meanwhile, there has been intense public interest in whether the Ministerial Code is as effective as it needs to be following the resignation last week of the Independent Advisor on Minister's Interests. These recent events, which have made headline news in the UK and elsewhere, make the implementation of the UN's recommendations even more relevant and urgent.

We note that these recommendations are not new. In May 2018, the Council of Europe's Group of States Against Corruption (GRECO), made almost identical recommendations to the United Kingdom to prevent corruption and promote integrity in central government. The only response so far by the Government to these recommendations has been the initiation of post-legislative scrutiny for the Transparency of Lobbying, Non-party Campaigning and Trade Union Administration Act 2014. Discussion of the UK's compliance with these recommendations at GRECO has been delayed due to late submission of relevant information by the UK.

Last weekend at the G20 Summit in Saudi Arabia, the UK Government committed with other partners to lead by example on corruption and to "more effectively implement our existing obligations and commitments" under international anti-corruption architecture, including the UNCAC.

In 2021 nations will be gathering at key global summits addressing corruption and governance, including the UN General Assembly Special Session (UNGASS) on corruption, and the proposed Global Democracy Summit promoted by the president-elect of the United States of America. Urgent and effective implementation of the UN's outstanding recommendations is essential if the UK is to retain credibility as a leader in the fight against corruption. The implementation of these recommendations would help bolster the Government's stated ambition to promote itself as a force for good in the world by reinforcing global standards and norms of integrity and good governance.

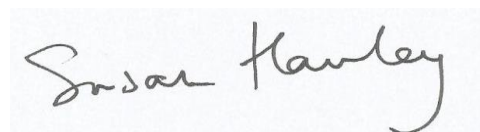
Finally, we note that the UK's compliance with treaties such as the UN Convention against Corruption rests on a commitment to uphold international law. This is particularly the case with conventions like UNCAC and the OECD Anti-Bribery Convention which are not incorporated into domestic law. The UK's credibility at global forums such as the G20, the OECD, UNGASS, and the UN depends on it being seen as a country that upholds international law at all times.

In this vein, we urge the Government to ensure that it publicly reaffirms its commitment to international law, in particular by withdrawing those aspects of the Internal Market Bill which breach international law, and to implement without delay the UN's outstanding recommendations to the UK to improve its framework for preventing corruption.

We look forward to your response.

Yours sincerely,

Susan Hawley



Co-Chair of the UK Anti-Corruption Coalition

Rachel Davies



Co-Chair of the UK Anti-Corruption Coalition

In copy to the Rt Hon. James Brokenshire MP, Minister for Security, and John Penrose MP, The Prime Minister's Anti-Corruption Champion.