TI-UK Strategy: Challenging Corruption in Changing Times

Transparency International UK (TI-UK) strategic framework approved by the TI-UK Board March 28th 2017

March 2017

Vision

TI's global vision is:

a world in which government, politics, business, civil society and the daily lives of people are free of corruption.

TI-UK's vision is a society in which we work together to strengthen the defences against corruption, so that:

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

Objects

The Charity's objects are:

(a) the relief of poverty, suffering and distress in any part of the world caused directly or indirectly by corruption; and

(b) the promotion for the public benefit of ethical standards of conduct and compliance with the law by governmental, industrial, commercial, voluntary sector and professional organisations in international and domestic business transactions and overseas development initiatives.

Corruption

Transparency International defines corruption as

'the abuse of entrusted power for private gain.'

Contents

1. Introduction

This Strategy, presented in the form of a strategic framework, updates the Strategy approved by the TI-UK Board in 2014. The updated strategy is not time limited, but outlines an overall strategic direction and a framework that will allow TI-UK to respond to changes in the external environment, which may be extensive over the next few years. It is envisaged that the Board will re-visit, and if necessary refresh, the strategy in 2020. Meanwhile, it is likely that each of the four programme areas might update their own area of the strategy in consultation with the relevant Board committee, starting with the Business Integrity Programme within the first year.

Summary: Six Key Themes in this Strategy

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

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

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

Increasing impact - we will increase the impact of our activities; we will prioritise growth in impact over growth in staff numbers – with the exception of PHP, which we expect to increase towards the size of DSP.

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

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

1.1 Background

This strategy has been drafted during a period of rapid political and economic change both in the UK and globally – including the Brexit-related pre-occupations of the UK, the change of administration in the US, the resurgence of the 'strongman syndrome' in politics and the threats to fundamental institutions of a free society such as an independent judiciary and the ability of the media and civil society to operate. Some of the challenges this poses are outlined in section 1.7 below.

There are not many institutions in the UK or the wider world that exist to safeguard some of the key laws, institutions and practices that we have come to take for granted. Many of these are now under threat. At the same time, there will be new opportunities for the anti-corruption movement: governments take security more seriously than ever, and TI's Defence & Security Programme are world leaders in demonstrating how insecurity and corruption go hand in hand; and the UK's new bilateral trade deals are full of potential for creating a level playing field for business by building in anti-corruption and transparency provisions.

Whether to counter the threats, or take advantage of the opportunities, the world's small but effective anti-corruption community is needed more than ever. A flourishing Transparency International will be required to play a key role in world affairs in the coming years, and TI-UK's strategy acknowledges the need and is a declaration of intent that we expect to rise to the challenge.

1.2 About Transparency International in the UK

Transparency International UK (TI-UK) is the UK national chapter of Transparency International (TI), one of around a hundred national chapters in the TI movement. We fight corruption by promoting changes in values, attitudes and behaviour at home and abroad, through programmes that draw on the UK's unique position as a world political and business centre with close links to emerging economies.

Our beneficiaries are:

those who are the victims of corruption in the UK and overseas;
those who have not become victims due to corruption being prevented;
    all those in societies which benefit from strong and transparent institutional structures
    that help deter and defend against corruption; and
those in economies whose development is enhanced through reducing corruption.

On behalf of our beneficiaries, we aim to tackle inequality and injustice where they cause, perpetuate or result from corruption.

TI-UK's successes to date include:

  Leading a decade-long campaign to secure the UK Bribery Act 2010, and setting the standard for the Adequate Procedures companies produce to comply with the Bribery Act

  Originating the concepts of, and substantially contributing to, the UK's first Anti-Corruption Plan (2014) and Anti-Corruption Strategy (2017 forthcoming)

Promoting the adoption of Unexplained Wealth Orders in the UK (2017)

  Persuading 43 governments to adopt 648 commitments at the London Anti-Corruption Summit (2016)

  Negotiating the inclusion of 'Building Integrity' initiatives into NATO's core operations

  Developing indices for companies and governments, in the defence and other sectors, resulting in measurable progress in transparency and behaviour.

TI-UK has secured these successes through a combination of rigorous research, intellectual leadership, tenacious advocacy, working closely with partner organisations and presenting practical and implementable solutions.

We are an atypical chapter in the TI movement, in that as well as working on corruption within the UK, we host two global programmes on Defence and Health, London is a global financial centre, the UK has extensive links with corrupt actors elsewhere in the world, and the UK plays a global role through forums such as the UN, G7, G20, OECD and Commonwealth.

Since developing the previous strategy TI-UK has transformed its approach and capability, establishing ourselves as a key player in the anti-corruption movement in the UK and beyond, and successfully placing corruption high on the agenda of policy makers in the UK. We have re-structured so that we have four programme areas, backed up by support functions, and more than doubled in size.

In the past three years, we have created a fundraising department and a communications department, a new global programme (PHP) and a UK advocacy and research team. We have also become the largest chapter – measured by income – in the TI movement:

	2013	*2016*
Staff	**18**	**40**
Income	**£1.25m**	**£2.8m**

Figures from TI-UK Annual Report & Accounts 2012/13 and 2015/16

1.3 TI's Global Strategy and TI-UK

The Board of TI-UK approved a three-year strategy in April 2014. The revised and updated TI-UK strategy presented here is designed to be flexible according to changing circumstances and not time-bound; it is anticipated that the Board will review it after three years, or sooner if considered necessary.

Working with others in the TI movement is critical to ensure that as a movement, we are more than the sum of the parts, and can deploy our expertise and resources as effectively as possible to tackle corruption. It remains a key part of our strategy to engage work closely with our colleagues in the TI Secretariat and other chapters.

This TI-UK strategy is intended to align TI-UK with the global TI strategy which runs 2016-2020, as well as reflecting changing circumstances and capability within TI-UK, the UK and globally. It adapts, in response to the particular challenges and opportunities for a TI chapter operating in the UK context, the following key areas of the TI global strategy 2016-2020:

People & Partners

'Our emphasis will be on enabling and facilitating a culture of anti-corruption action. We will support individuals and groups of people to act to demand accountability in a sustained and systematic way. We will focus on those who are strategically positioned to lead anti-corruption work, those who want to be a part of our anti-corruption movement, and those who are directly affected by corrupt practices and behaviour. Importantly, we will do more to make sure those who strive to stop corruption around the world are safe to pursue their efforts.

Prevention, Enforcement & Justice

'Where laws and standards remain weak, we will suggest ways they can be strengthened to bolster corruption prevention systems. Too often, even the best laws are not effectively implemented or enforced, allowing the corrupt to get away with their crimes. Given the persistence of impunity for corruption, we will promote institutions that adhere to the highest possible anti-corruption standards. These must be backed by law enforcement and justice systems capable of prosecuting and punishing corruption – especially grand corruption – to the full extent of the law.'

Strong Movement

'To become even better at what we do, we must draw even more on our global reach, grow our influence and innovate in our work. Above all, by 2020, we will need to understand better what works to stop corruption. We will also lead by example in our work and to be present as a force for anti-corruption where it matters the most.'

1.4 Our Objectives

Through this strategy we are aiming:

In our mission

1. To achieve a significant reduction in corruption and corruption risk, especially through our global programmes and in areas influenced by the UK
2. To promote greater transparency in the public and private sectors
3. To improve accountability so that people and institutions act with integrity and there are strong defences against corruption
4. To sustain global anti-corruption standards for governments, companies and international institutions
5. To help ensure there is no impunity for corrupt individuals and institutions, through promoting enforcement and the rule of law
6. To ensure that corruption is at the heart of the national and international debate.

In our organisation

1. To ensure that we are the UK's turn-to organisation for corruption information, policy and opinion.
2. To foster a world-class research, advocacy and programme capability in order to help us achieve this.
3. To develop our human capital, ensuring that TI-UK has a high-quality, sustainable and satisfied workforce
4. To develop our network capital, forming and maintaining partnerships both externally and within the TI movement, that enable us to achieve our objectives
5. To achieve sustainable financing: we will put our finances on a sustainable footing, so we are not too heavily reliant on any sector or individual donor; this will require more innovative and energetic fundraising, as well as strengthened project management.

Within this strategy's first year, we will develop KPIs for measuring our progress against these objectives so that we can report our impact to our stakeholders.

1.5 Achieving our objectives

The mechanisms for achieving our objectives will be:

Research - we will provide a solid evidential basis for our advocacy, using research to understand how and where corruption takes place, on what scale, and what can be done about it.

Advocacy - through disseminating well-informed views, policy positions and practical guidance, and through pro-active advocacy, we will persuade people and institutions to change.

Policy development and constructive solutions - we will use our research to develop implementable policy solutions that address the problems we have highlighted.

Network capital - we will work with others who can help increase TI's reach and impact, mobilising the support of a global coalition against corruption that includes civil society, individual citizens, other TI national chapters around the world, the private sector, the public sector and academia; raising awareness of the devastating effects of corruption, and building a wider support base for TI's mission.

1.6 TI-UK: addressing the need

Our programmes and priorities are developed on the basis of where the need is greatest, taking into account TI-UK's mission and remit, the resources available, and what other organisations are already doing or not doing. We have identified the following key areas of need that our programmes are designed to address:

UK corruption: corruption exists in all countries, including the UK. It creates and perpetuates injustice, inequality and poverty. The UK requires strong institutional defences against corruption, backed up by a culture of integrity in public institutions, and a willingness to act against corruption when it is suspected or uncovered.

Corrupt capital: like other global financial centres, the UK and its Overseas Territories and Crown Dependencies can provide a safe haven for corrupt individuals and their assets to be laundered or invested. This gives the UK, and TI-UK, a responsibility to ensure that there are adequate defences against money laundering, backed up by transparency and accountability, and with an adequate legal framework and law enforcement when the anti-money laundering defences have been breached.

Role of the private sector: companies can be perpetrators, victims and allies with regard to corruption. We view the private sector as a key player in the fight against corruption and will continue to work in partnership with companies; but acknowledge that global corporations are often participants or complicit in corruption and we need to hold them to account, in public, where necessary.

Defence & Security: global insecurity is both caused and perpetuated by corruption; it feeds off corrupt defence establishments, in both public and private sector, which operate under conditions of great secrecy and minimal accountability. Political decision making is distorted, huge budgets are mis-appropriated, and the world's poorest people on the most fragile states often suffer most.

Pharma & Healthcare: corruption in global healthcare is widespread, and unlike some other forms of corruption has a direct, immediate and highly damaging human impact.

1.7 Changing Context

TI-UK is operating in a rapidly changing context politically, economically, and with regard to the global fight against corruption. Some of the key issues that have informed the development of this strategy are:

The rise of populism: we will need to interpret the public mood, analyse where it may be manipulated by political or other leaders for their personal gain, and be prepared to hold the line when populist outrage turns itself against institutions such as the judiciary. There is a risk that TI-UK itself will be seen as elite, aligned with elites or run by elites.
Being an evidence-based organisation in the post-truth era: our commitment to providing objective and independent research is out of step with current trends in politics and the media.

Changing political climate and political will: TI's anti-corruption mission has enjoyed strong political support from strategically important governments for a number of years, while at the same time being opposed by others. It is possible that the balance of power is shifting towards those who oppose TI's mission, and those who have supported it will no longer do so in future.

International institutions and global standards: post-Brexit and with a new US administration, the commitment to, and role of, key international institutions and instruments is likely to be re-examined; there is a risk to important actors for TI's mission, including the OECD Anti-Bribery Convention, FCPA implementation and a broad commitment to global anti-corruption standards.

Aid and corruption: a fast-moving debate in the UK and globally is the extent to which aid is rendered less effective by corruption, and what can be done about this. TI is naturally an organisation that is turned to for answers; and in the UK, with an active ODA and INGO scene, TI-UK may be expected to play a fuller part in this debate.

Tech and open data: this is a fast-developing field, well used by other NGOs, and with a world-class expertise on London on 'civic tech' for collecting, analysing and communicating data.

TI movement: internally, the TI movement is undergoing a period of change, in which certain responsibilities and functions are being devolved to national chapters to operate on behalf of the global movement. Externally, TI has been strongly supported in recent years by many stakeholders, but may face challenges to its reputation if it is seen as less relevant, less practical, too challenging, insufficiently challenging or ineffective in tackling the problem it was set up to deal with.

1.8 Leveraging the UK's Global Position

The remit of each TI national chapter is to address corruption within its own national jurisdiction. However, the activities of some national chapters, including the UK, inevitably extend beyond their strict national boundaries for historical or practical reasons. In the case of the UK, there are historical connections with some areas of the world, such as Overseas Territories, which do not have a national chapter; the UK plays a role on the world stage in forums such as the UN and G8;

the UK's largest businesses are multinational companies; the UK, notably the City of London, is a global financial centre; and the UK is a destination of choice for significant amounts of foreign capital and investment.

We also host on behalf of the TI movement two global programmes, which have a remit to operate internationally, following guidelines agreed with the TI movement. These give us an opportunity and an obligation to work within a global context, an expertise which we can fed back into our other programmes.

This strategy envisages that, after three years, the two global programmes hosted by TI-UK will be significantly larger, both individually and in combination, than the rest of TI-UK. This will inevitably raise questions both for TI-UK and the TI movement more generally about the role of the UK chapter within the global TI movement. We will aim to work closely with TI-S and the international board to identify the risks, challenges and opportunities that this global role will pose, and to ensure they are resolved in the best interests of TI's mission.

For the time being, TI-UK will continue to work geographically, where relevant with the agreement and support of the TI Secretariat or other national chapters, where the need arises.

1.9 Capitalising on the tech revolution

Several TI chapters have been good at exploiting the tech revolution; and since London is a global centre of 'civic tech' this presents an opportunity for TI-UK to be innovative in the way it operates. It may be possible to achieve much more, with little additional investment, by adapting tech solutions that others have already developed and are available as a public good – and, for example, by using volunteers to enhance our social media presence. Areas in which we will explore tech solutions are:

Communicating our messages to key target audiences
Connecting to key audiences and the wider public in two-way
exchanges Information gathering to inform our research and advocacy
Data collection and analysis.

1.10 Developing our Organisation

We aim to be one of the UK's most authoritative and respected NGOs. We will develop a world-class research and advocacy capacity, and become the UK's turn-to organisation for corruption information, policy and opinion. We expect each programme to operate to the highest standards, though each is at a very different stage of maturity.

Our re-structuring has created four programme areas, backed up by the support functions of Comms, Fundraising, IT, HR and Finance. This gives us a scaleable model in which more

programmes can be added, and individual programmes can expand or contract as the need arises.

While aiming to increase our impact significantly, this does not necessarily mean we must increase our staff numbers substantially. We do expect TI-UK to grow in line with the objectives and aspirations of this strategy. However, our primary ambition is to increase our effectiveness and impact in order to achieve our goals. We believe that much can be achieved through being energetic, innovative and entrepreneurial.

In particular, we will:

> Develop monitoring & evaluation procedures that allow TI-UK and our stakeholders to assess our effectiveness and impact, as an organisation as a whole and within individual projects and programmes

Work further to develop collaboration and coordination between our programmes
> Make sure that our back office systems – IT, HR, finance and our databases – are fit for purpose
> Invest in our human capital through benchmarking salaries, training, career development, and exploring the opportunities within the wider TI movement.

1.11 Resourcing

Resourcing this strategy will require additional funds. In addition to funds for each programme area, we will need to invest more in our support functions and back office. It is fair to say that during our recent rapid growth, we have under-invested in the support functions, and it will be a priority during our new strategy to adjust this. We aim to do so through a fundraising strategy that makes each programme self-financing, and thereby allows us to re-invest the surplus that is currently created by the Business Integrity Programme.

We will also create a small internal Innovation Fund, which will allow Programmes to receive funds for activities that they believe are important, but which may lie outside the scope of project-related funding.

A key component of our resourcing will be to up our game in our communications and fundraising functions. These have done the job they were asked in helping us grow us to date; but we will aim to appoint a new Director-level head of these functions to take us to the next level.

2. UK Anti-Corruption Programme (UKACP)

Goal

> Our goal is to prevent corruption in the UK, and the UK from contributing to corruption elsewhere. We aim to do this by improving the resilience of public institutions, increasing accountability, and ending the UK's role in providing a safe haven to the corrupt and their illicit wealth.

2.1 Context

The UK is a major trading economy, prominent aid and development donor, and active participant in international fora; the capital, and the City of London in particular is a global financial centre. This presents an opportunity to leverage anti-corruption efforts in the UK to have a positive impact in raising global standards. Our research is highly regarded and our advocacy has achieved major successes from the introduction of the UK Bribery Act, a public beneficial ownership register for UK companies, and hosting of the London Anti-Corruption Summit, through to support for a new law to improve the recovery of illicit assets.

However, major domestic and international political change presents a very different landscape for our future work: a sudden change of government in the UK, anticipation of the UK's withdrawal from the European Union and its institutions, and the shattering of consensus by the rise of populism and nationalism on multiple continents. Past international leadership in the enforcement of anti-corruption rules by the United States has given way to a retreat into deregulation.

It will take a great deal to keep anti-corruption efforts high on the agenda of politicians, and to cultivate a culture of greater public expectations for high standards in public life, but with weakened institutions and change in the air, it is now more important than ever.

2.2 Priorities

1. Promote integrity standards in public service both for politicians and public servants, and influence public policy to secure these through system change.
2. Increase accountability and transparency through policy leadership and partnership in the execution and public exploitation of open governance.
3. Work towards ending impunity by restricting the freedom of corrupt individuals and regimes, and the means available to them to launder and shelter the proceeds of corruption in the UK.

2.3 Key Activities

Our UK Anti-Corruption Programme will advance three themes of work: *Integrity in Public Service, Open Governance,* and *Corrupt Capital.* We will publish authoritative research to inform policy and well-crafted narrative to communicate it, deploying our credibility as a respected source of policy ideas to press for our recommendations to be taken forward in government and legislation. We will nurture a network of voices in civil society and our own supporters in a broad coalition and explore new ways to engage the public across the country in calls for action from Parliament and Government, and keep anti-corruption high on the public policy agenda.

2.3.1 Integrity in public service

We will consider the role of money in politics before, during and after individuals hold elected office, by examining data and practice in: political party funding, lobbying transparency, and the revolving door. Recognising new roles in a more decentralised structure of power, we will develop proposals to address the risk of local government capture by advancing standards for integrity in public office. We will work towards framing integrity as an election issue in 2020, to secure commitments from candidates. Beyond parliament, our work will consider the integrity of public procurement and other public institutions.

2.3.2 Open Governance

To help improve the UK's information infrastructure and increase the use of open data to fight corruption, TI-UK's work will focus on areas where we assess that domestic progress is possible, and where this progress can have a significant international impact: getting companies, government and the third sector to provide open data e.g. through open contracting, making better use of available data, and setting out how the quality of the UK's information infrastructure can better meet users' needs.

2.3.3 Corrupt Capital

Since 2014, this campaign has explored the role of the UK as a safe haven for corrupt money and corrupt individuals from across the world. Our current focus is on: an inadequate anti-money laundering system, lack of transparency over the true 'beneficial' owners of UK assets, an ineffective asset recovery regime, and the role of UK businesses and other organisations in 'reputation laundering'. Priority subjects for research projects include: Corruption and the Overseas Territories, reputation laundering, and professional enablers.

2.3.4 Strategic Initiatives

The Programme will pursue strategic initiatives that advance all themes of our work:

   UK Anti-Corruption Strategy: we will encourage implementation of the Anti-Corruption Summit outcomes through our UK Pledge Tracker, and launch similar tools in additional countries. We will promote anti-corruption measures in international development and UK trade policy, and anticipate using the UK Government's Anti-Corruption Strategy to hold it to account for its efforts until 2020.

   National Integrity System: we will engage academic partners to promote their participation in research council funded work on the subject of corruption in the UK, including regions and devolved administrations, and measures to pursue and prevent it.

Through these partnerships, we will seek research funding to conduct a new National Integrity Systems assessment for the UK as it anticipates leaving the European Union. Utilising an established TI methodology, it would assess corruption risks (including in public procurement, economic development and control, and emerging areas such as modern slavery), the integrity and resilience to corruption of democratic and public institutions (including Parliament, the police, prisons, and UK border and immigration), and the capability of key watchdogs and enforcement bodies.

Case Advocacy & Legal Advice: we will evaluate existing models in UK public advice services and approaches used by other TI chapters (including ALACs) to crowdsource from public experience an evidence base for UK corruption, generate advocacy priorities, and involve the voluntary sector in advice and law based responses to cases of corruption.

Grand Corruption: we will promote the Corruption Perceptions Index and calls for Grand Corruption offences, explore the options for prosecuting Grand Corruption in the UK, and participate in international anti-corruption projects such as the Global Alliance Against Corruption.

2.4 Outcomes

The public debate around integrity in public life advanced, to build a consensus for system changes in the UK with safeguards such as open contracting in public procurement.

The release and then the use of open data championed as the essential vehicle for accountability in the pursuit of the corrupt and their assets. Citizens, journalists and investigators empowered to test the integrity of published data and use it - whether on the trail of illicit assets, or corporate lobbying.

Proposals adopted to create a hostile environment for corrupt individuals and to facilitate the return of their illicit assets to the peoples from whom they were taken.

The UK Government held to account on its commitments, plans and ambitions in the new Anti-Corruption Strategy, and on its record in directing and resourcing anti-corruption law enforcement.

2.5 Resources

The UK Anti-Corruption Programme is intended to be financially self-sustaining, securing grant and project funding to deliver the Programme's strategy. The team will comprise six permanent, full-time posts, supplemented by short-term secondees and staff or investigators contracted to fulfil requirements of discreet funded projects. We will also explore ways of working in partnership to resource an advocacy capability in Scotland.

Project work draws on knowledge and networks of other programmes at TI-UK, such as BIP on corporate liability and TI-DS for asset recovery. We are complemented by the Senior Global Advocacy Manager, based alongside our team, call on the expertise of TI-UK's Senior Legal Officer, and make extensive use of the Communications team.

3. Business Integrity Programme (BIP)

Goal

> To raise anti-corruption standards in UK-based companies so that they improve their own performance and help raise standards globally; and to increase awareness so that individuals and institutions within the private sector do not participate in, enable or endorse corruption.

3.1 Context

TI-UK's aim is to be the premier voice and resource centre in the UK on private sector corruption matters, and as a resource centre on the private sector for the rest of the TI movement.

This will draw on TI-UK's strengths as a leading voice on key aspects of private sector corruption, not just bribery, with the wider business community in the UK.

TI-UK Business Integrity Programme (BIP) is the leading programme of its kind in the TI movement and is recognised as a centre of excellence in relation to its work with the private sector and in running one of the oldest and most successful Business Integrity Forums. Given the number of other forums in the UK dealing with anti-corruption, we need to ensure the forum remains relevant and unique in combining industry and TI perspectives. We aim to build strategic relationships with the private sector so that, without compromising our independence, there is legitimate input from the business community into our work; and that we can influence standards and behaviours in the private sector.

3.2 Priorities

3.2.1 Raising Awareness

Raising awareness of the impact/ importance of corruption and the responsibility of business in the regard.

> We will continue to speak at the top compliance and anti-corruption conferences & forums and will continue to look for opportunities to speak to new audiences. These conferences give us a platform and voice to top FTSE compliance and legal counsels as well as other professionals to re-iterate and reinforce our message.

We also continue our work with the managers of the future though guest lectures – e.g. through the CEMS programme at LSE and CSR master's programmes at Nottingham Business School.

Finally, we will continue to use media such as our website, social media and the press to communicate on issues of the day and to communicate with those we find hard to reach otherwise.

3.2.2 Raising Standards

Raising standards across the board.

The Business Integrity Forum remains our main vehicle for raising standards in Industry. We currently have just under half the FTSE25 in our membership who act as standard bearers. We will continue to work hard to keep an active and relevant membership by fostering relevant discussions and bringing in new members. We are a "critical friend" to the business community and will use our influence where companies are failing to adhere to high standards of integrity.

We are working more actively with the investor community to put more pressure on the laggard companies to raise standards. Last year's Corporate Political Engagement Index (CPEI) was very well received by this community and there is a strong appetite for more benchmarking studies.

TI-UK has invested heavily in the Corporate Anti-Corruption Benchmark over the last 3 years. It is a unique service providing a complete TI perspective on anti-corruption best practice. Our strategy for the coming year is to continue to develop the tool through revising the high-level index, improving reporting and to develop ways to validate results. We are also looking to increase participation in the benchmark to cover all BIF corporate members and a few non-members by invitation.

3.2.3 Raising Competences in Others

Raising competencies in others (includes capability building, tools, guidances, training, etc.).

We have amassed a library of leading tools and guidances on ABC since the publication of the "Adequate Procedures Guidance to the UK Bribery Act 2010". Revising this and launching an "Adequate Procedures Portal" will bring this journey full circle and should keep TI-UK firmly on the ABC Compliance expert map for the next 5 years. We have a pipeline of updates and new tools with potential funders lined up.

Our eLearning course, Doing Business Without Bribery is a much-used free resource and is due for a refresh. We will look for opportunities to have it translated into the major world languages to help the wider business community and will continue to provide these tools as a resource for other chapters to localise. Our eLearning course for the International Development sector (Doing Good Without Bribery) serves as an excellent example to the larger donors of how TI can support corruption-free aid delivery.

3.2.4 Ensuring a Level Playing Field

Ensuring a level playing field for UK Business globally and global business in the UK

We will take on a much more active role in working with multi-stakeholder processes such as the Anti-Corruption APPG and the EITI. We also see a more active role for BIP in defending the UK Bribery Act be it in the press, though ad-hoc processes such as the UK Anti-Corruption Summit or through established forums such as the APPG.

We provided extensive input into the OECD Phase IV consultation in 2016 and will continue to provide input into external consultations.

Our USP is our engagement with the private sector, NGOs and government (such as the SFO) and the trust that these sectors have in TI-UK to help ensure a level playing field and raise standards across the board. We aim to remain a trusted critical friend to all.

We will monitor the activities and effectiveness of key enforcement agencies, such as the SFO, and intervene where appropriate and possible.

3.3 Key activities

Producing and disseminating best practice guidance related to the Bribery Act and other areas of corruption

Corporate benchmark

Running the Business Integrity Forum

Providing a TI perspective and policy recommendations on corporate-related public policy issues, including the extractive industries, country-by-country reporting, corporate liability, and related issues

Monitoring the UK's enforcement regime as relevant to corruption and the private sector

Ad-hoc activities including training and advice for BIF members, speaking at conferences and forums.

3.4 Outputs

Dissemination of corporate benchmark trends and lessons learned

Publication of best practice guidance and tools that support this such as indices Business Integrity Forum activities

Making TI's voice heard in debates on corruption and the private sector, in the media, policy development and wider society.

3.5 Resources

Although the programme's revenues are not expected to grow significantly, the current programme team is expected to increase to four people, with new tasks including relationship management with large corporate partners and improving the corporate benchmark.

4. Defence & Security Programme (DSP)

Goal

Our objective is for a world with open governments served by transparent defence institutions that are accountable to ordinary people and whose primary purpose is the protection of all citizens.

The defence industry supporting these institutions should provide capability based on clear national defence strategies in a fair and open market, and be held to account through effective and independent oversight mechanisms rooted in functioning civil societies and efficient government procurement.

We believe that peace and stability will only be secured when people are able to realise their ambitions under accountable institutions, and when citizens' interests drive national policies and the decisions of their leaders.

4.1 Context

The defence and security sector accounts for large portions of national budgets; it is highly technical; and there are only a few providers on the market bidding for these large contracts. It is often emotionally charged, highly politically volatile, and relies on data that is rarely open for public scrutiny and oversight. It is thus fertile ground for corruption. It is a serious problem for governments, defence and security institutions and citizens.

Global defence and security expenditure accounted for over USD 2 trillion in 2008, over 2.5% of GDP worldwide; a figure that is accelerating. A lack of popular accountability and secretive defence spending is one of the biggest risks to international stability we face – whether precipitating conflict in fragile environments, or undermining global stability.

Corruption in the defence wastes public goods. We have estimated that the financial cost of corruption in the defence sector is, at a minimum, USD 20 billion a year. The theft of national budgets that this represents has a significant impact in terms of the missed opportunities to invest in health, education and infrastructure.

Corruption in the defence sector weakens institutions. Corruption within the defence and security sector degrades nation's ability to provide security. It can mean soldiers

operating with equipment that doesn't work, or with no equipment at all – such as in Ukraine, where it has been cheaper for a citizen to bribe his way out of military service than buy the equipment that the MoD fails to provide soldiers with. It can destroy morale of the security personnel and in worst case scenarios whole armies can fall apart. Corruption in the defence sector drives conflict and instability. In fragile environments, the corrupt have robbed millions of the proceeds of their economic endeavours, fuelling explosive responses – from violent extremism to political revolution. There is a wealth of evidence which points to a strong link between corruption and conflict, with Boko Haram in Nigeria and the Taliban in Afghanistan forming but two salient examples. This threat is not limited to the most evidently fragile states. Corruption can sow the seed of uprisings in even seemingly stable and prosperous countries if those in power do too little too late to share the proceeds of development, engage their populations in debate or deliver basic expectations.

4.2 Priorities

In order to achieve an overarching goal of having a corruption-free, accountable defence and security sector, Transparency International Defence and Security (TI-DS) has three main priority areas of work:

Establishing global standards: holding advanced and emerging powers to account
Preventing Conflict and supporting international efforts to prevent build security in fragile states
Addressing systemic risks in the Arms Trade (supply side).

4.3 Key activities

We will conduct a major campaign to increase standards across the globe, using the Defence Anti-Corruption Index, our most effective tool, to incentivise action among advanced economies. We will work with a group of key states from the global North and South to develop a set of global principles/standards of responsible defence governance, with the aim of having near universal adoption through regional groupings such as ASEAN, AU, and NATO.

We will be implementing country programmes in three key countries (Ukraine, an African country, and a Middle Eastern country), that in the future may also focus more regionally, providing expertise and support to international efforts to prevent conflict and build stability.

We aim to have a substantial programme of work covering peacekeeping and will develop a stronger portfolio of expertise on security sector reform covering at least one of the following sorts of areas: establishing oversight in fragile environments, foreign policy approaches to fragile/kleptokratic regimes, tackling ghost soldiers and building personnel systems and reducing corruption in settlement process. Our ambition is to establish a centre of expertise on supporting security sector institutions in fragile environments, as part of a consortium with leading academics.

In addressing risks in the arms trade, we will be pushing companies to improve compliance programmes, and ramping up pressure on those with the weakest commitment to responsible business practices. In many cases efforts to drive good practice will be best achieved working at

a national level. We will be focussing on raising the bar on export control practices and raising importer standards in priority emerging markets. We will also increase our focus on the role of suspension and debarment, the effective enforcement and expansion of legislation (UK Bribery Act and FCPA) and changers in buyer behaviour.

Underpinning all our efforts, we aim to create a new demand for our training work. We will expand our pool of individual experts and trainers available to defence establishments around the world who have knowledge of defence anti-corruption and who can catalyse reform and strengthen integrity in their own establishments.

4.4 Outputs

- Wide formalised acceptance of global transparency and accountability standards in the defence and security sector, particularly among major, influential and emerging powers.
- Measurable reduction in corruption risk in the defence and security sectors of key states, including fragile and conflict states.
- Major power security policy reflects that corruption is a threat to stability and peace, and practical recommendations to reduce it are implemented.
- Corruption on international interventions and operations is minimised by ensuring that armed forces, civilian practitioners and policymakers have the incentives, awareness, tools and training that they need to counter corruption.
- Companies have transparent systems and high anti-corruption standards and are committed to reduction corruption risks, raising standards globally and can be held to account.

4.5 Resources

DSP's full complement is 18 staff, supported by high-level advisers and consultants. We expect to be at full complement within eighteen months, supplemented by 4-6 staff deployed around the world who will be employed by other TI chapters but fully-funded by TI-UK.

5. Pharmaceuticals & Healthcare Programme (PHP)

Goal

To improve global health and healthcare outcomes for the benefit of all people of all ages.

5.1 Context

Governance gaps combined with the commitment of huge amounts of resources make the pharmaceutical and healthcare sectors particularly vulnerable to corruption. This also makes them highly attractive sectors for those who are seeking illicit gains.

The embezzlement of public health budgets and kickbacks in the procurement process can result in the overpayment of goods and services. By reducing health budgets, corruption threatens a country's ability to provide universal health coverage (UHC). Corruption diverts resources from the public sector, making it difficult to appropriately fund healthcare facilities that help ensure increased access and quality care. Of equal importance, corruption undermines public trust in governments and public services, the willingness of healthcare professionals (HCPs) to take government instructions and warnings seriously, and patients' willingness to make use of health services.

There is a lack of evidence-based knowledge of corruption in the health sector. Despite this, even with limited indicators, the scale of the problem is clearly vast. The WHO estimated that at least 6% (representing USD 300 billion) of health care spending is lost to corruption and related issues.

Preventing abuse and reducing corruption therefore helps increase resources available for health, to make more efficient use of existing resources and, ultimately, to improve the general health status of the population. PHP was created two years ago to enable the TI movement to address corruption in a sector that is critical to human well-being.

PHP has identified a set of key opportunities to explore as the programme becomes fully operational. These include the SDG framework for health & corruption; increasing interest in corruption among the global health community; the strong TI reputation and movement, interest and involvement of several Chapters from outset (strong sense of ownership), and support from TI Secretariat.

5.2 Priorities

Research & Development: Corruption in R&D can lead to unsafe or ineffective products entering the health system and medical knowledge being compromised.
Manufacturing (including fake medicines).

Procurement: Corruption in procurement can lead to the purchase of obsolete, dangerous, ineffective, or undelivered products, facilities and services. This is a considerable expense in most health budgets, e.g. significant share of drug procurement in HICs and LMICs.

Marketing: The improper marketing of products in the healthcare sector can lead to the use of inappropriate products and unnecessary treatments.

Service Delivery: Healthcare delivery primarily covers the interactions between healthcare professionals and patients. Corruption vulnerabilities within this category are those most visible to patients and cover e.g. absenteeism to bribery.

5.3 Key Activities

Open Contracting, notably through the Open Contrracting for Health (OC4H) project

Health Action Fund: providing grants to other TI chapters for national-based work.

Development of work with the private sector to provide and gain acceptance of good practice guidance

Promoting standards through benchmarking and providing comparative performance data, likely to be through a Government Index and a Companies Index (possibly in partnership with other organisations)

UK-focused project

Advocacy towards global institutions to address systemic problems identified by our research.

5.4 Outputs

Adoption of open contracting tools in health procurement in a number of countries

More transparent and accountable marketing practices in pharma and MD industries

Support a range of national and local projects run by TI chapters via the Health Action Fund

Government and company index delivered, supported by strong network of expertise in health through TI movement

Adoption of policy proposals for the UK NHS to increase transparency, strengthen accountability and reduce corruption risks.

5.5 Resources

A core staff team in London will be built to a full complement of eight, supplemented by four programme experts in other TI chapters, fully-funded by TI-UK but employed by the national chapter.

6. Network capital - working with partners

TI has a good track record of working in partnership with others to achieve its objectives. This 'network capital' is an important aspect of our work, although has generally been carried out in an ad-hoc manner. In future, we will more consciously develop our network capital, fostering relationships with others who can help increase TI's reach and impact, mobilising the support of an inclusive global coalition against corruption.

Our objectives in building this network capital are:

> To harness the influence and resources of other organisations in support of TI's mission
> To add TI's support those who are already working on issues of relevance to TI

To raise general awareness of the devastating effects of corruption

To build a wider support base for TI's mission

To ensure that TI-UK remains well informed about corruption-related events and trends.

Among the priority groups for us to engage are:

> Policy makers, law-makers and senior officials in government and global institutions, including politicians and civil servants
> The wider public, including students and individual citizens Regulators

Law enforcement agencies

> Private sector, both individual companies and industry bodies Professional services firms

Academia

> The media, and in particular investigative journalists Civil society
> Donors, including those who are also campaigners in their own right TI movement.

The global network of the TI movement is particularly important to TI-UK. Our global programmes need the cooperation of other chapters to operate in their jurisdictions, and are often able to achieve far more when the chapter actively supports the global programme at local level. Beyond the global programmes, there is also scope for us to work in partnership with other chapters on specific projects of mutual interest, for example in relation to corrupt capital or political funding. It is also the case that TI-UK, as one of the movement's largest chapters, is able to contribute to the wider movement in terms of expertise and resource. We have done so, for example, in advising on the creation of Business Integrity Forums.

There are also occasions on which TI-UK, or its lead public spokespersons, are asked for information or comment on other global corruption issues that do not fall within the remit of existing programmes. Examples include aid and corruption, global corruption trends, and events in specific countries or groups of countries such as the Arab Spring countries, China, Brazil or

Romania. We will keep under review how we deal with such issues, with our default position being that they lie within the remit of the Executive Director, and we will rely on our network of contacts, particularly TI national chapters, in order to ensure we are adequately informed.

We will aim to take a far more strategic approach to working with other TI chapters, identifying those with which there are particularly opportunities and synergies and where possible fostering strategic relationships with them.

7. Strengthening our organisation

7.1 Communications

We have a good track record of success with the media, but there is an opportunity to move to more pro-active and strategic approach to our Comms. This will involve at minimum:

Complete redesign and overhaul of the website
　Developing a more nuanced social media strategy
　Improving the engagement around the blog
Exploring and capitalizing on other tech advances.

We also have an opportunity to up our game in terms of messaging and strategic communications; one option for doing so is to appoint someone at Director level, who will oversee both Comms and Fundraising.

Resources

We currently have two people in the Comms team, with one post frozen. We will aim to move this to three permanent posts, as well as moving the Events & Public Engagement officer from UKAR into Comms, and introducing a Director of Comms and Fundraising to give us a more strategic approach and ensure that our comms function fully supports our fundraising efforts. We will also explore the potential for using volunteers to enhance our social media presence.

7.2 Fundraising

TI-UK is currently the most successful chapter in the TI movement with regard to fundraising. However, we believe we can do much better, and unlock additional funds for both TI-UK and the TI movement more generally.

Our strengths lie in institutional fundraising, the private sector and trusts and foundations that have a specific interest in our areas of work. However, we are weak in the area of major donors and large global foundations, many based in the US, that might have an interest in our global programmes.

In particular, we need to develop a greater culture of fundraising. TI-UK has progressed significantly over the last three years, but there remains at times some organisational inexperience with engaging donors outside of TI-UK's usual sphere of influence and making the ask. We will seek to embed a culture of fundraising across TI-UK, creating a step change in the level of ambition in our thinking and actions, increasing Board and SMT involvement in fundraising, and exploring how Trustees and senior volunteers could better enable fundraising.

As a pre-requisite for improving our fundraising success, we need to improve how we create appealing, innovative and relevant asks to target donors. We have identified two actions for addressing this:

Increasing our knowledge and application of impact monitoring.
Better articulating the story of our impact through a compelling narrative, requiring the data we receive through M&E to be allied with a communications strategy that has fundraising at its core.

Like most TI chapters, TI-UK raises very little money from the general public. We do not plan to expand this for the foreseeable future, as other income streams generate a better return on investment, and substantial up-front investment would be required. However, we will pay close attention to moves towards this elsewhere in the TI movement, and adapt our strategy accordingly if this looks likely to be a successful avenue. One potential area is diaspora communities in the UK to benefit other chapters, although this would need to be an effort substantially led and invested in by TI-S.

Overall, we aim to create a sustainable funding platform for the organisation, reducing the reliance of programmes on a single donors or a restricted pool of donors.

To do this we will:

Diversify income by securing new donors from current income streams
Increase income from high net worth individuals
Explore new income streams such as academic funding and international foundations.

Key elements to the fundraising strategy will be:

Create a fundraising culture
Each programme should be as far as possible self-sustaining financially
Developing multi-year funding so that individual programmes have continuity even when the largest grants come to an end
Generate sufficient unrestricted funds that we can invest in our support functions, develop our human capital and allow the space to innovate
Explore new avenues eg major donors (ie wealthy individuals), research councils
Cooperate closely with TI-S for sourcing movement-wide funding from the UK
Explore options for fundraising for global programmes from US and global institutions Build the opportunity to up our game and make much stronger link between fundraising and comms
Additional investment and Director-level appointment (or equivalently experienced consultants).

Resources

TI-UK currently has a fundraising team of three (2.6FTE). New staff resources may be required, for example a part time fundraiser in the USA and/or a dedicated PHP fundraiser. Consideration will be given to whether a Director-level post encompassing TI-UK's fundraising and communications functions should be created to boost TI-UK's identity, visibility and messaging; this would help drive success and support a culture of fundraising.

7.3 Finance & Resources

During our period of recent growth, we have under-invested in our 'back office' functions. However, the strategy will require strong back office systems in finance, HR, IT and database management. In 2016, we have for the first time had a full-time Director of Finance & Resources, and this has both strengthened our capability and identified many areas for improvement.

We will aim to strengthen our back office functions through allocating additional investment to these areas. This will include an IT review and a strong organisational commitment to implementing and maintaining a CRM database.

It is envisaged that by 2020, we may be employing around 50+ staff, and we will be managing complex international projects, as well as giving grants to other TI chapters (for example, through the Health Action Fund). We will grow our back office functions as necessary, but without creating an onerous overhead that has to be serviced merely to keep going.

A key part of our future success will be our ability to attract and retain staff. We have an international workforce, and the changes caused by Brexit may make this harder to sustain in London. We will make a concerted effort to develop our human capital, by exploring how we can provide a workplace to attract and retain the best. We will benchmark our salaries against peer organisations, and if this suggests we need to adjust salaries or other benefits, we will aim to do so as and when our financial situation allows.

7.4 Monitoring & Evaluation

Within the first year of this strategy, we aim to develop new Monitoring, Evaluation & Learning (MEL) metrics that are in line with those of the wider TI movement. We will focus on outcomes and impact, not simply inputs and outputs.

In our M&E review, we will consider using established TI indices to help us measure the UK's overall progress, while acknowledging that these lie outside our direct control. These include:

Corruption Perceptions Index: the UK remains in the top 10 [Currently: 10=/176]
OECD Anti-Bribery Convention: the UK is rated as an Active enforcer [Currently: Active]
Global Corruption Barometer: levels of UK bribe-paying are below 5% [Currently: 0%]
TRAC: UK's largest companies are upper quartile [Currently: 1st, 2nd and 3rd quartiles].

7.5 Governance

We will periodically review our Governance, including the role of membership, and the structures which we use to manage the global programmes that we host on behalf of the TI movement.

8. Risks

In addition to the operational risks that are covered in the organisation's on-going risk management procedures, the staff and board have identified the following risks as key factors that might prevent the delivery of this strategy:

Political change: the past few months have seen rapid political changes in many countries, and this provides the context within which TI-UK works. It is possible that further changes could enhance or impede our ability to deliver this strategy; but we will monitor such changes and adapt our approach as required.

Reputational damage: TI's access, authority and ability to sustain itself rest in part on its established reputation as a trusted partner, willing to campaign and hold those in power to account, but operating in an inclusive and evidence-driven manner. This is a hard reputation to maintain, and a substantial change in reputation would require a change in strategy.

Financing: a working assumption of this strategy is that we will unlock sufficient resources in the UK and elsewhere to support the activities outlined. However, in a time of political and economic uncertainty, there is insecurity about funding.

Effectiveness of the TI movement: some of our activities, notably within the global programmes, are considerably enhanced by having a strong TI movement. Ineffectiveness in areas that are beyond our immediate control may reduce our own ability to operate as we plan to.

9. A Commitment to Excellence

Our aim is that in all areas of the organisation, including mission delivery, systems, administration and support services, we will foster and maintain a culture of excellence.[1]

All employees are integral to the success of TI-UK. No matter what role they play, each of them contributes something important to making this a successful community and organisation. While the roles may vary, the basic expectations of TI-UK do not.

It is expected that all employees observe the following general guidelines:

> Be committed to the success of TI and TI-UK – and not solely their own position and department
> Do their job enthusiastically and to the best of their abilities – hold themselves to high standards
> Treat others with courtesy, respect, and fairness
> Respect the diversity among staff and in our audiences Strive to grow professionally
> Be honest in communication
> Take responsibility for raising issues and solving problems
> Be thoughtful stewards of TI-UK and its resources
> Acknowledge others for a job well done.

All employees can expect the following from TI-UK:

> Fair and equitable treatment
> Acknowledgement for a job well done
> Help in achieving professional goals
> Objective feedback regarding performance
> An environment free of discrimination and harassment To be listened to with respect
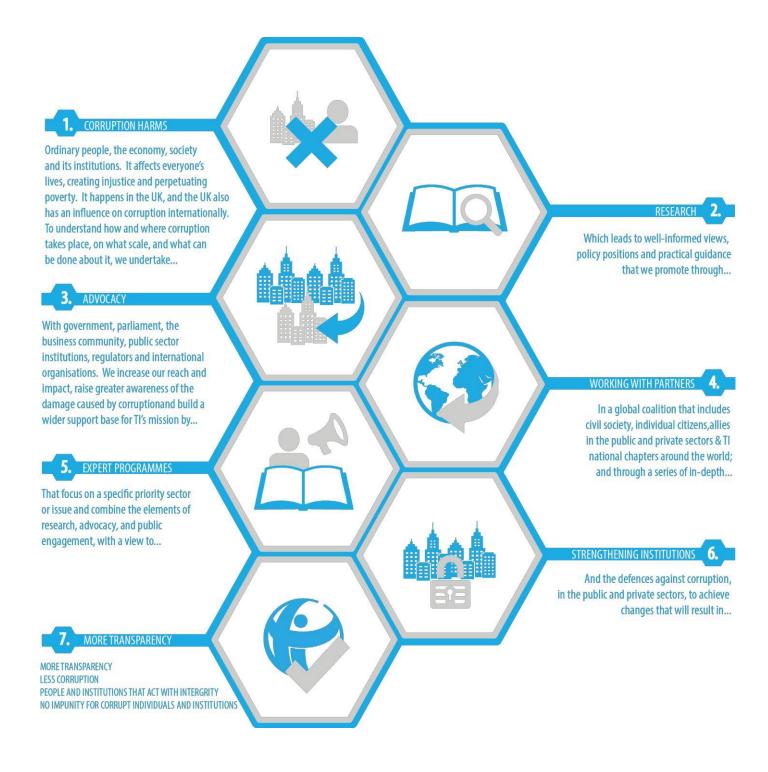> A response to their concerns.

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[1] The remaining text in this section is quoted directly from TI-UK Governance & Procedures Manual.

Annex I – Three-year Projections

Note that in an organisation the size of TI-UK, relatively small changes can make a large difference. For example, a single medium-sized grant can be the difference between surplus or deficit, or the ability to take on an additional employee. Likewise, one good media story could help recruit hundreds of supporters. These figures are therefore offered as a very approximate guide to how the strategy in this paper might look in numbers over the three year period.

	2017-18 Proposed budget	2018-19	2019-20
Annual income £000s			
UKACP	442	500	500
BIP	508	600	700
DSP	1,340	1,900	1,700
PHP	477	1,200	1,500
Other	155	200	300
TI-UK total	2,922	4,400	4,700
Unrestricted reserves £000s	380	450	500
Staff (permanent but not all FTE)			
Dir/Finance/HR (core)	6	7	7
Comms/F'raising/M&E	6	8	8
UKACP	6	6	6
BIP	3	4	4
PHP	6	8*	8*
DSP	14*	18*	17*
TI-UK total	41	51	50
	*plus 3-6 DSP staff wholly paid for by TI-UK but located in other chapters	*plus staff wholly paid for by TI-UK but located in other chapters: PHP- 4, DSP- 5/6	*plus staff wholly paid for by TI-UK but located in other chapters: PHP- 4, DSP- 5/6
TI-UK Members	120	145	170
Social media Followers (inc ED, DSP, PHP)	25,000	35,000	50,000
BIP			
BIF members	40	40	40
Corporate benchmark	16	20	25

Annex II - Theory of Change

1. CORRUPTION HARMS

Ordinary people, the economy, society and its institutions. It affects everyone's lives, creating injustice and perpetuating poverty. It happens in the UK, and the UK also has an influence on corruption internationally. To understand how and where corruption takes place, on what scale, and what can be done about it, we undertake...

2. RESEARCH

Which leads to well-informed views, policy positions and practical guidance that we promote through...

3. ADVOCACY

With government, parliament, the business community, public sector institutions, regulators and international organisations. We increase our reach and impact, raise greater awareness of the damage caused by corruptionand build a wider support base for TI's mission by...

4. WORKING WITH PARTNERS

In a global coalition that includes civil society, individual citizens, allies in the public and private sectors & TI national chapters around the world; and through a series of in-depth...

5. EXPERT PROGRAMMES

That focus on a specific priority sector or issue and combine the elements of research, advocacy, and public engagement, with a view to...

6. STRENGTHENING INSTITUTIONS

And the defences against corruption, in the public and private sectors, to achieve changes that will result in...

7. MORE TRANSPARENCY

MORE TRANSPARENCY
LESS CORRUPTION
PEOPLE AND INSTITUTIONS THAT ACT WITH INTERGRITY
NO IMPUNITY FOR CORRUPT INDIVIDUALS AND INSTITUTIONS

Annex III – Organisational Chart
as of April 2017

Directorate

Robert Barrington
Executive Director

Claire Prescott
Management Assistant

Fundraising, Finances & Resources

Joe Gharad
Director of Finance & Resources

Louise Russell-Prywata
Head of Development

Hannah Catsey
Senior Development Officer

Manoo Lyimo
Development Officer

Cornelia Stephenson
Finance & Admin officer

Nafisaro Woodhen
HR Manager

Paige Rogers
Office & database administrator

Finance Manager
to be appointed Oct 2017

Communications Officer
to be appointed Oct 2017

Communications

Dominic Kavakeb
Communications Manager

Jon Le Marquand
Digital Communications Officer

Defence & Security Programme (DSP)

To increase transparency and reduce corruption in the defence & security sector internationally.

Katherine Dixon
Director, Defence & Security Programmes

Accountable Defence Sectors

Deputy Director
to be appointed Sept 2017

Hilary Hurd
Advocacy Manager – USA lead *

Amira El-Sayed
Programme Manager

Eva Okunbor
Project Officer

Industry Integrity

Andy Watson
Programme Manager

Eva Anderson
Senior Legal Officer

Conflict & Insecurity

Leah Wawro
Programme Manager

Gavin Raymond
Training & Capacity Building Officer

Karolina MacLachlan
Senior Research Officer *

Pharmaceuticals & Healthcare Prog. (PHP)

To reduce corruption in the global Pharmaceutical & Healthcare sectors.

Director, PHP
to be appointed Sept 2017

Sarah Harris
Programme Manager

4 positions – DfDfH project
to be appointed Oct 2017

Business Integrity Programme (BIP)

To raise anti-corruption standards in UK based companies so that they improve their own performance and help raise standards globally; and to increase awareness so that individuals and institutions within the private sector do not participate in, enable or endorse corruption.

Director, Business Integrity Prog.
to be appointed Sept 2017

Rory Donaldson
Programme Manager

Alice Shone
Programme Manager

UK Advocacy & Research (UKAR)

To set the national agenda on corruption, undertaking advocacy that achieves strategic changes in policy, attitudes and behaviour, and thereby achieve a material reduction in corruption in the UK and overseas.

To be the UK's thought leader on corruption, producing high-quality research that leads to well informed views, policy positions and practical guidance that provide a platform for effective advocacy.

Duncan Hames
Director of Policy

Advocacy

Rachel Davies
Head of Advocacy

Rosie Zussman
Advocacy & Campaigns Officer

Maggie Murphy
Senior Global Advocacy

Research

Steve Goodrich
Research Manager

Ben Cowdock
Research Officer

Jameela Raymond
Senior Policy Officer

Temporary staff: Philippa Davis, British Army Secondee 1/2 months, BIS/PHP intern, starting Sept 2017
Key: purple text indicates part-time role, blue text indicates position yet to be approved

International, operating out of several DSP positions located in National Chapters. (Annex II – Nigeria I., will add others tbc.