

# **2024/25 ANNUAL PLAN**

**Board Approved 27 February 2024**

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# INTRODUCTION

We are Transparency International UK.

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

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

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

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

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

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

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

### Most recently in the UK:

- We secured two landmark laws in 2022 and 2023 to tackle dirty money, the proceeds of corruption, in the UK economy following our seven-year campaign that was underpinned by rigorous research.
- New rules governing MPs' second jobs and improved transparency over their financial interests were introduced in 2023, banning Westminster politicians from accepting cash for lobbying services in response to our expert evidence and ongoing campaign to increase integrity in politics.
- We conducted an authoritative investigation into the UK government's first 1,000 Covid-19 contracts, revealing red flags for possible corruption in £3.7 billion of public spending. This prompted reforms in procurement laws and a specific module in the UK Covid-19 Inquiry.
- Our rigorous benchmarking tools have helped FTSE 100 companies improve their anti-corruption programmes, while our anti-bribery guidance for businesses is used nearly 3,000 times a year.

### Most recently internationally:

Internationally, governments and civil society rely on our unique Government Defence Integrity Index<sup>1</sup> (GDI) to work towards promoting transparent and accountable defence institutions which are resilient to corruption. Our global movement's expertise has also been key to building consensus at the UN on the need for tighter regulations of private military and security companies. Our partnerships with Transparency International chapters in West Africa and Tunisia have advanced efforts to build better integrity in the defence and security sectors.

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

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

This Annual Plan is the first in the next phase of our refreshed strategy, 'Stopping Corruption – Promoting Integrity'.

This year, we will deepen our programme of work across the public sector, political sphere and private sectors of the UK. In parallel, we will continue to lead influential global programming for the wider Transparency International movement focused on corruption prevention in Global Health, and Defence and Security. Our work will pursue success under four strategic and will focus on a series of programme objectives described in the sections that follow.

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<sup>1</sup> a comprehensive assessment of the quality of institutional controls to manage the risk of corruption across 77 areas, with the goal of producing a detailed assessment of the integrity of national defence institutions.

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# 2024-25 CONTEXT

Over two billion people around the world will have the chance to vote in 2024, which promises to be a pivotal year for democracies and citizens seeking to hold power to account. Millions more live in places suffering from war and violence inflicted on them by unaccountable leaders and armed groups. International efforts to work together to tackle corruption are obstructed by antagonistic states with competing visions in a more divided world. Investors and businesses are more concerned than ever with their wider purpose, but scrutiny of their environmental and social governance now demands that this is more than just words.

**In Britain, politicians facing an election are reminded how essential is the currency of trust, if the public is to give them and their ideas a hearing at all. Public inquiries such as that into the response to the Covid-19 pandemic is putting public service under a spotlight, in which both policy formation and the protection of public resources has been found wanting. Turning around a now well-established slump in the global Corruption Perceptions Index<sup>2</sup> will require determined action to challenge current practices and strengthen institutional defences against corruption.**

The implementation of recent legislation to prevent money laundering by UK companies and to unmask the ultimate owners of property in England and Wales is an opportunity to address London's reputation as a global hub for dirty money. Resolve to similarly address opaque trusts, and the supervision of professionals in the private sector, needs to be accompanied by decisive action. It is however delays to the opening up of company registers in Britain's offshore finance centres, places like the British Virgin Islands, which demand renewed attention after their own commitments to deliver reforms by the end of last year were largely missed.

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<sup>2</sup> The CPI is the most widely used global corruption ranking in the world. It measures how corrupt each country's public sector is perceived to be, according to experts and businesspeople. A country is scored where 0 means highly corrupt and 100 means very clean.

As heightened geopolitical tensions reshape global supply chains and against a backdrop of changing regulatory demands, the mandate of corporate compliance functions becomes ever more expansive. In the UK, sanctions regimes continue to have an impact while the imminent publication of government guidance on the 'reasonable procedures' defence, which will bring the 'failure to prevent fraud' offence into effect, further adds to this pressure and risks diverting resources.

The evolving scope of sustainability, standards and regulations is a continuing priority for compliance teams as companies both set sustainability commitments and face increasing legal risk. At the same time, this regulatory direction underscores the critical importance of business integrity in the environmental, social and governance conversation as key issues such as 'greenwashing<sup>3</sup>' and 'undue influence<sup>4</sup>' in lobbying highlight where sustainability initiatives are undermined through corrupt practices.

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<sup>3</sup> Greenwashing can be defined as the processes of conveying false or misleading information about activities, organisational procedures, products, or services having positive impacts for the climate. The term can be used broadly, for example, covering false advertising, eco-labelling and using green messaging to shield companies or governments from broader social criticisms.

<sup>4</sup> Undue influence occurs when particular individuals or groups gain an unfair advantage by excessively influencing a decision-making process to their own ends, at the expense of the public interest. Undue influence can occur when decision-making is opaque, when public officials and/or lobbyists act unethically and when access is skewed in favour of select interests.

Globally there has been a marked shift in accepting that corruption is a problem in the health sector. Corruption has moved from being an 'open secret' to being openly recognised in the 2023 UN high-level meeting as an impediment to attaining UHC, and with it Sustainable Development Goal 3<sup>5</sup> (SDG 3 which focuses on global health and well-being). Similarly, draft versions of the Pandemic Accord have contained a number of transparency and accountability provisions, which if brought through into the version due to be ratified in 2024, will go some way to preventing the opacity and corrupt acts that were witnessed during the Covid-19 pandemic.

However, with the deadline to meet SDG targets in 2030 only six years away, increased efforts are needed to ensure that corruption does not reverse or block progress. To bring about change will require UN bodies to embed anti-corruption into health system policies and guidance, and development donors to integrate anti-corruption approaches into their programmatic and investment strategies. The global nature of health supply chains, which often span multiple countries, presents unique challenges. Addressing corruption vulnerabilities within these supply chains requires collective action from the pharmaceutical and the life-sciences industries, governments and multilateral agencies alike. Responsible lobbying to avoid undue influence in the health sector is another area that has not been extensively looked into and requires more research to better understand the impact it has on health systems globally.

Within countries, it will also require governments to systematically integrate anti-corruption measures into domestic health systems. International expectations to do so are not enough alone. For true reforms to happen, concerted efforts by citizens and civil society groups to ensure change takes place are key to making sure governments are held to account and deliver on tackling corruption in the global health sector.

The past year has also seen increasing recognition of the relationship between corruption and insecurity. Russia's ongoing war in Ukraine continues to exemplify how corrupt authoritarian regimes threaten international peace and security. Instability continues in West Africa, with recent coups leading to tensions in the relationship between the Economic Community of West African States and member states, while Niger, Burkina Faso and Mali's junta have formed a block with strong resentment for French military intervention in the region and increasing dependence on the Wagner Group<sup>6</sup> for security provision. Global relations with China remain a topic of great speculation, and it is unclear what lessons China will take from the war in Ukraine in relation to the South China Sea and Taiwan. North Korea meanwhile is upping its belligerent rhetoric, and the situation in Gaza exemplifies the horrific cost of the Israel-Palestine conflict.

The urgency with which corruption is being addressed as a security threat is failing to keep pace with the scale and threat of these world events, all of which are linked in some way to

corruption. Military operations, arms exports and security sector assistance all look set to increase, while corruption risks within defence institutions around the world, well documented by our GDI, remain high.

There are windows of opportunity at the national and international levels. This year is a significant one in terms of UN-level policy with, for example, the UN Summit of the Future taking place in September. However there are growing perceptions of bias in the international system and a realisation of the limitations to multilateral capability to enforce international agreements, and this risks undermining the credibility and potential of the UN system.

This global context requires a global response, driven at the national level across the Transparency International movement, informing and shaping international progress towards a world without corruption in defence and security, leading to better security for all.

<sup>5</sup> UN Sustainable Development Goal 3, [Ensure healthy lives and promote well-being for all at all ages](#). Published on [SDGS.UN.ORG](#)

<sup>6</sup> PMC Wagner, Russian state-funded private military company controlled until 2023 by Yevgeny Prigozhin, a former close ally of Russia's President Vladimir Putin.

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# PROGRAMME GOALS AND PRIORITY WORKSTREAMS

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

1. Stop the Flow of Dirty Money
2. Protect the Public Resources
3. Secure Integrity in Politics
4. Drive Integrity in Business

To make progress against these objectives, our UK programmes will continue to address both corruption in the UK and the UK's contribution to corruption around the world. Priorities for 2024-25 include:

It is vital that recent economic crime laws addressing money laundering and abuse of UK shell companies are implemented effectively, with the remaining loopholes closed. We will also push for ambitious reform to the supervision of anti-money laundering measures in high-risk sectors, transparency in Britain's Overseas Territories and accountable asset return. As a UK-wide general election approaches, the Transparency International UK team will be working to cultivate champions on this issue in the new Westminster Parliament and next government; whatever its political hue.

We will seek to build a new cohort of MPs promoting integrity in the Westminster Parliament; to translate manifesto commitments for increased transparency and higher ethical standards into tangible reforms; and deliver greater accountability over the use of public resources, particularly during a crisis. Pending funding, a deepening crisis in local government also provides a hook to promote stronger safeguards over the use of public resources at the subnational level. We will continue to explore the extent to which integrity issues, and undue influence arising from secretive lobbying in particular, connect with salient issues of the moment such as the climate, housing and healthcare.

We recognise the value in a multistakeholder approach to change and will proactively mobilise civil society coalitions and explore how good actors in the private sector can contribute to our mission. For example, through sharing intelligence, undertaking joint advocacy or through bringing investigative assets to the table.

We will continue to support companies and investors in their efforts to promote integrity in business. New European sustainability reporting rules<sup>7</sup> amplify our call for meaningful and accurate corporate anti-corruption disclosures while evolving due diligence requirements are an opportunity for companies to leverage and adapt their anti-corruption system. The new 'failure to prevent fraud' offence is similarly an opportunity for companies to build on their existing anti-corruption and integrity measures. We will continue to strengthen our business integrity offer and build networks with companies, investors and multistakeholder groups to increase our outreach and impact.

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

## In Global Health:

- We will leverage the increased recognition among global health stakeholders on the threat that corruption poses in the sector and influence this community and governments to better embed anti-corruption measures into their national health systems. This includes developing and deploying powerful evidence on the impact of corruption on key global health outcomes, as well as tools to better understand where losses are occurring within systems. We will continue to raise our profile in the global health community, running webinars and

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<sup>7</sup> EUROPEAN COMMISSION, [Corporate sustainability reporting](#). Published on FINANCE.EC.EUROPA.EU

in-person events looking into what works in tackling corruption in the health sector in conjunction with USAID and the World Health Organization's Global Network on Anti-Corruption, Transparency and Accountability in Health.

- In collaboration with U4 Anti-Corruption Resource Centre (Chr.Michelsen Institute, Norway) we will work to understand how we can better engage and influence bilateral donors and multilateral institutions to ensure that they commit greater resources to tackle corruption in the health sector. We will use the outcomes from this work to engage with donors and advocate for greater resource allocation.
- Continuing our trajectory of supporting improvements on procurement transparency in the health sector, we will develop further partnerships with industry to unpick and address upstream supply chain vulnerabilities. Alongside chapters, we will work to improve oversight, and accountability in national supply chains to prevent corruption risks related to diversion, theft and stockouts<sup>8</sup>.
- In conjunction with chapters in Southern Africa, we will continue to work on addressing the drivers of corruption in service delivery, strengthening governance and oversight mechanisms, and increasing community accountability measures to allow victims of corruption to have a voice, and seek restitution.
- We will facilitate the development of greater collective action efforts to tackle corruption in the health sector, developing tools and resources that allow civil society groups and the media to hold power to account. Our existing artificial intelligence machine learning tool (known as AIMon<sup>9</sup>) will be expanded to allow more journalists and civil society actors to use this information for action. We will cultivate greater reporting into corruption in the health sector, supporting deep-dive investigations into corruption. Additionally, toolkits will be developed to empower civil society, in particular women's and youth networks, to take a leading role in combating corruption in the sector.

## In Defence and Security:

This year we launch our global campaign, outlined in the new Transparency International Defence and Security strategy 'Securing Integrity, Fostering Peace'. We want to achieve a paradigm shift towards international recognition of and response to corruption as a security threat. We know from experience that while this message is readily accepted in principle, it is rarely taken on board in practice when it matters most – in times of conflict or in the face of other pressing security concerns.

- Our focus will be on building visibility, convening and mobilising partners, providing a foundational evidence base for the campaign, and supporting the Transparency International movement to engage on this agenda. We will also push to translate our evidence of corruption as a security threat into multilateral institutions, focusing on the incorporation of anti-corruption into EU and UN approaches to security sector reform and the embedding of the use of the GDI.
- At national level, we will support countries with influence on global security outcomes with practical technical solutions to embed anti-corruption in specific security policies and approaches. This year our focus will be on helping the US address the risk of corruption-enabled arms diversion, through the provision of research and technical guidance on the integration of anti-corruption into arms transfer decision-making.
- Globally, we will work with chapters across the Transparency International movement to support informed and active citizens who are driving integrity in defence and security. We will continue to support and enable our active community with a wide range of Transparency International chapters, facilitating information-sharing, lesson-learning and coordinated advocacy in support of global efforts to increase civil society engagement with and oversight of the defence and security sectors. In partnership with Transparency International chapters in North and West Africa and the Sahel, we will respond to the continually developing security landscape in the region. We will do this through joint delivery of projects that support the capacity and ability of national actors to push for defence sector anti-corruption reforms in line with national priorities. We will also lead a coordinated campaign with chapters for improved access to information in the defence sector and deliver a new approach to increase public awareness and engagement on the risks of defence companies undue influence on national security, defence, and foreign policy decision-making.

<sup>8</sup> Where inventory levels are insufficient to meet demand, leading to compromised patient care and treatment outcomes.

<sup>9</sup> AIMon scans hundreds of thousands of online news sites in real-time for articles containing reports of corruption in the procurement and delivery of Covid-19 vaccines and helps uncover trends and themes. Data can be filtered for types of corruption as well as by country and region.

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# ORGANISATIONAL PRIORITIES

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

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

During 2024-25, we will prioritise the following:

- Continuing to work with colleagues in the Transparency International Secretariat in Berlin to strengthen the movement-wide value and leadership of Transparency International UK's accredited international programmes.
- Sustaining our high level of influential media exposure and relationships with a focus on strategically important engagement with target audiences for all programmes, building the profile of our global programmes within the movement and maintaining Transparency International UK's profile as the leading voice in the fight against corruption in the country via our website and other communication channels.
- Continuing to diversify and strengthen our income pipeline, securing at least £3.3 million funding in-year, with refreshed multi-year targets developed to support refreshed programme strategies.
- Continuing to promote and develop a high trust culture where new strategic opportunities and adaptability are key to delivering a collaborative, engaging and learning culture with a focus on knowledge sharing throughout the employment journey. All colleagues will have access to the tools that support a Speak Up culture. We continue to challenge our programmatic and organisational assumptions, particularly in relation to gender, race and privilege as part of fostering a diverse and inclusive workspace.



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## FINANCIAL OVERVIEW

Total income for the year is forecast to increase by 15 per cent to over £3.5 million. This reflects a funding renewal by the main donor to our Defence and Security programme and our ongoing focus on diversifying funding for all our programmes.

Of this, £720,000 is anticipated to be unrestricted in nature, with the remainder received under restricted programme-funding agreements. The level of secured funding in place as we enter the financial year is 41 per cent and lower than the previous year (80 per cent) with negotiations for the remaining funds well progressed with existing donors. Planned programme expenditure is broadly aligned with prior years and with our international programmes supporting the wider policy and practice work of the movement. Seven per cent of funding is allocated to grants to other chapters and partners.

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# RISK MANAGEMENT

Transparency International UK's top risks are reviewed alongside the process of creating the annual budget. It should be noted that there may be a risk in an individual programme that is significant for the entire organisation, an aggregation of similar risks from within the programmes that, when grouped together, represent a high organisational risk, or an organisational level risk that does not feature in any specific programme's section of the risk register. The Senior Leadership team regularly reviews the risk register, identifying appropriate mitigation steps and associated timelines. The top organisational risks at present are:

- Strategy delivery ambition
- Security (particularly for international programmes/cyber security (in light of the conflict in Ukraine/Russian dirty money)
- Funding/finance (particularly funding shared services from restricted grant recoveries and unrestricted)/programme funding cycles
- Employee turnover/well-being/blended working/economic situation
- Safeguarding (duty to protect from harm)
- Legal litigation
- Demonstrating the impact of our work to external stakeholders

# ANNEX

## 2024-2025 Income and Expenditure Budget

|   | 2023-2024          |                   |                    | 2024-2025        |                   |                  |
|---|--------------------|-------------------|--------------------|------------------|-------------------|------------------|
|   | Restricted<br>£    | Unrestricted<br>£ | Total<br>£         | Restricted<br>£  | Unrestricted<br>£ | Total<br>£       |
| <b>Income (receivable)</b>                                |                    |                   |                    |                  |                   |                  |
| UK Anti-Corruption / Business Integrity                   | 1,229,432          | 590,500           | 1,819,932          | 690,182          | 672,000           | 1,362,182        |
| GTN: Defence & Security                                   | 806,920            | -                 | 806,920            | 1,975,085        | -                 | 1,975,085        |
| GTN: Global Health  | 381,510            | -                 | 381,510            | 126,827          | -                 | 126,827          |
| Unrestricted Fundraising / Deposit Interest               | -                  | 50,000            | 50,000             | -                | 50,000            | 50,000           |
| <b>Total Incoming Resources</b>                           | <b>2,417,862</b>   | <b>640,500</b>    | <b>3,058,362</b>   | <b>2,792,094</b> | <b>722,000</b>    | <b>3,514,094</b> |
| <b>Expenditure</b>  |                    |                   |                    |                  |                   |                  |
| Project Activities  | 1,117,097          | 20,000            | 1,137,097          | 443,860          | 20,000            | 463,860          |
| Project Employee / Consultant Costs                       | 1,969,106          | 722,687           | 2,691,793          | 1,977,804        | 565,516           | 2,543,320        |
| Grants Issued to TI Chapters / Partners                   | 711,986            | -                 | 711,986            | 255,977          | -                 | 255,977          |
| Support Costs   | 517,530            | (517,530)         | -                  | 646,608          | (646,608)         | -                |
| People, IT, Governance, Finance & Admin                   | -                  | 357,580           | 357,580            | -                | 566,053           | 566,053          |
| <b>Total Resources Expended</b>                           | <b>4,315,719</b>   | <b>582,738</b>    | <b>4,898,456</b>   | <b>3,324,249</b> | <b>504,960</b>    | <b>3,829,210</b> |
| <b>Surplus / (Deficit)</b>                                | <b>(1,897,857)</b> | <b>57,762</b>     | <b>(1,840,095)</b> | <b>(532,155)</b> | <b>217,040</b>    | <b>(315,116)</b> |
| Shortfall in restricted programmes<br>– Project employees | -                  | -                 | -                  | 117,946          | (117,946)         | -                |
| <b>Net Surplus / (Deficit)</b>                            | <b>-</b>           | <b>-</b>          | <b>-</b>           | <b>(414,209)</b> | <b>99,094</b>     | <b>(315,116)</b> |
| Funds brought forward 1 April<br>(forecast)               | 3,178,756          | 449,000           | 3,627,756          | 1,819,014        | 470,902           | 2,289,916        |
| Funds carried forward 31 March                            | 1,280,899          | 506,762           | 1,787,661          | 1,404,805        | 569,996           | 1,974,800        |