

TRANSPARENCY INTERNATIONAL PRIORITIES FOR THE LONDON ANTI-CORRUPTION SUMMIT

Corruption has a corrosive impact on prosperity, growth, security, and the fight against extreme poverty. Transparency International believes the London Anti-Corruption Summit provides a unique opportunity for global leaders to signal intent at the highest level for tackling corruption head-on through concrete, ambitious commitments that can be implemented over the next five years. Global leaders must form a united front in the face of corruption and take action so that:

- Corrupt groups and individuals are not able to act with impunity and get away with their crimes.
- Businesses receive no benefit from taking part in dodgy deals and operating in the darkness.
- The people who are hurt most by corruption receive justice.

The London Anti-Corruption Summit should generate time-bound commitments that will:

1. **Prevent corruption:** Make it harder to hide and transfer and benefit from the proceeds of corruption by championing full beneficial ownership information transparency.
2. **End Impunity:** Improve the way law enforcement agencies in key countries and between banks, business, civil society share and act on intelligence, related to risk and suspicions of corruption.
3. **Empower and support citizens to seek justice:** Promote accountability and citizen engagement on corruption, and protect activists to do their work.

The Summit should also ensure that the tools and mechanisms are in place to ensure effective implementation and monitoring of the commitments over a 3-5 year period.

Finally, whilst the UK's leadership in convening the Summit is welcome, it remains crucial that the UK gets its own house in order. This is most evident in the need for the Overseas Territories and Crown Dependencies to adhere to the same standards in the UK with regards to beneficial ownership transparency. They must be required to publish time-bound plans of action for adopting public beneficial ownership registries.

TRANSPARENCY INTERNATIONAL'S SUMMIT VISION

Outlined below are key deliverables that could be adopted by governments at the London Summit in order to prevent corruption, end impunity and empower and support citizens to seek justice.

PREVENT CORRUPTION

1. **Champion full transparency of company ownership and control information**
 - Governments should set out clear timelines for establishing central, public registries containing beneficial ownership information.
 - Governments should support the adoption of a multi-stakeholder-led Global Public Beneficial Ownership Registry to aggregate information from government registries as well as collate that disclosed by proactive companies and via sectoral initiatives such as the Extractives Industries Transparency Initiative. This registry could provide a welcome solution for smaller states to save the cost of collecting information from scratch as well as allowing companies to publish the information once, rather than multiple times.

- 2. End the use of secret companies to bid for public contracts and purchase real estate**
 - Governments should require that any company bidding for a public contract or purchasing and selling property should disclose its beneficial ownership information.
- 3. Prosecute and de-license professional enablers.**
 - Governments should fully comply with FATF standards to require professionals in law and accountancy, real estate, as well as company formation agents and bankers to have in place anti-money laundering procedures and report suspicions of money laundering.
 - Governments should establish more effective administrative sanctions by encouraging professional bodies to withdraw professional licenses from those implicated in such cases.

END IMPUNITY FOR CORRUPTION

- 1. Strengthen law enforcement cooperation and information sharing between jurisdictions**
 - Improve the mechanisms by which intelligence is shared between law enforcement agencies in different jurisdictions. Also seek to develop mechanisms through which banks, business, civil society and other stakeholders can share information related to risk and suspicions of corruption.
- 2. Close the door to the corrupt individuals**
 - Governments should agree to develop commonly agreed “integrity” criteria for investor programmes and require strong due diligence processes prior to issuing residency permits or visas.
 - Governments should commit to develop a transparent visa denial-of-entry regime – which has human rights and due diligence safeguards- that is based on clear criteria for how to address individuals suspected of corruption. Countries should publish specific statistics on visas and entries refused on the basis of corruption.
- 3. Debarment**
 - Like-minded governments should establish a common debarment system which adopts and applies administrative sanctions. A list of debarred companies should be made public, similar to the online World Bank Listing of Ineligible Firms & Individuals. Any new system should leverage existing debarment databases.

EMPOWER AND SUPPORT CITIZENS TO REPORT CORRUPTION AND SECURE JUSTICE

- 1. Provide safe spaces to report corruption and seek redress**
 - Governments should issue a London Declaration of support to protect the space and safety of civil society organisations, anti-corruption activists and whistle blowers.
 - Governments that still lack whistleblower legislation should pass and implement loophole-free, stand-alone whistleblower protection legislation in both the public and private sector.
 - Government should support protective measures for activists and whistleblowers, including through increased support to initiatives for reporting, responding to and seeking redress for corruption complaints, and by providing strong digital security and physical protection measures.
- 2. Improve asset recovery frameworks**
 - Governments should commit to return stolen assets securely through a process that has openness and accountability at its heart. Where there are legitimate corruption risks in the repatriation process,

this process should include looking at alternatives that are effective, open, accountable and participatory.

- Governments should seek to implement the UN Convention Against Corruption article on illicit enrichment criminal offences, or Unexplained Wealth Order civil offences (depending on the national legal context).
- 3. Open up government data to help increase citizen engagement and move from promoting transparency to promoting accountability.**
- Governments should sign up to and adhere to the Open Contracting Global Principles and associated Data Standard to make better use of government driven data.
 - Governments should adopt the International Open Data Charter and make existing datasets progressively available as open data in widely used formats that are nonproprietary, searchable, sortable, platform-independent and machine-readable
 - Governments should adopt effective asset declaration systems to help detect illicit enrichment and reduce conflict of interest. Asset disclosures should include elements that could potentially influence or corrupt public officials: assets, liabilities, income from all sources, gifts and potential conflicts of interest.

TOOLS AND IMPLEMENTATION

Support company transparency and accountability

Governments should establish and champion high standards in anti-corruption and transparency in companies. For example, governments should use procurement conditions to incentivise the disclosure of beneficial ownership information and anti-corruption programmes.

Promote data literacy and engagement on corruption

Governments should promote open data literacy by supporting the collaborative development of guides, documents, training and tools that can increase the effectiveness and use of open data across government, civil society and business sectors.

Develop 3-5 year action plans

To sustain momentum in the aftermath of the Summit, it is crucial that countries develop action plans on implementing their commitments, and/or integrate their commitments into other mechanisms, such as the Open Government Partnership National Action Plans and their delivery of national strategies to implement the Sustainable Development Goals. A commitment to time-bound deliverables and regular collective check-ins should be established.

ILLUSTRATIVE CASE STUDY: CORRUPTION IN SPORT

Recent scandals have demonstrated how sporting bodies, officials, marketing companies, banks and professional enablers have been involved in money laundering, facilitating illicit deals and bribery. Corruption was made possible through imbalances of power, gross levels of impunity, poor governance and lack of transparency.

- Governments and other sporting stakeholders such as sponsors, international sporting organisations, and supporters' bodies should collectively adopt a London Declaration, setting out an action plan for improving transparency and governance of sports organisations.
- Governments should introduce a governance code of conduct for International Non-Governmental Sports Organisations