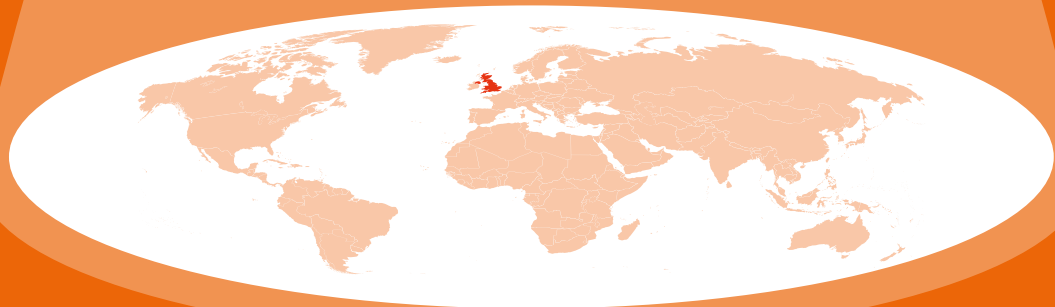


2019–2023

Impact Report

Spotlight on Corruption

**Shining a light on the UK's role in corruption
at home and abroad**



Our mission

Spotlight on Corruption shines a light on the UK's role in corruption at home and abroad.

Our vision

We want to see a society with strong, transparent and accountable institutions which ensure corruption is not tolerated and democracy flourishes both in the UK and globally.

Our role

To achieve this we highlight corruption and the harm it causes, and campaign to improve the UK's legal systems and enforcement of the law.

We do this by:

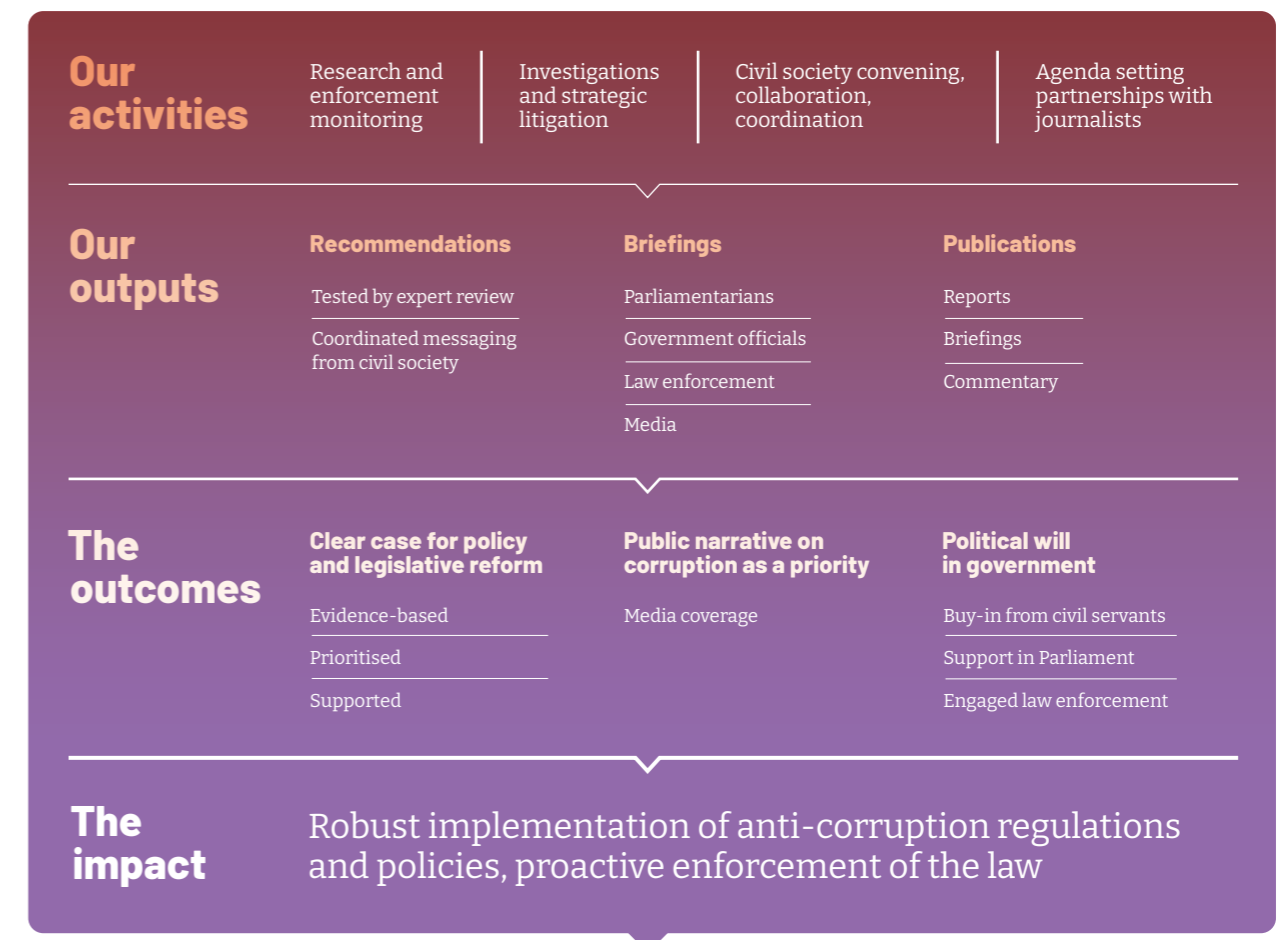
- Undertaking detailed, evidence-based and impactful research on how the UK implements its anti-corruption laws and international commitments
- Monitoring, analysing and sharing information about how the UK courts deal with corruption cases through our unique court monitoring programme
- Communicating our findings to key audiences – including policymakers, MPs, civil servants, NGOs and the public – in order to influence how decisions are made and be a spearhead for reform.

How we work

Spotlight plays a unique role as a policy entrepreneur, developing innovative proposals – sometimes radical but always realistic – to build momentum for reform and to inform public debate on anti-corruption issues.

Our forensic research draws on our unique court monitoring programme, on extensive engagement with stakeholders including academics and experts, and on techniques such as seeking information under the Freedom of Information Act. We act as a critical friend to law enforcement and government, and our views are widely sought and cited by the media, parliamentarians and civil servants. We play a key role as a convenor of others who wish to end impunity for corruption.

Our team is small but nimble by design, responding quickly to opportunities that can advance our strategic goals. We are committed to investing in our staff and to ensuring that Spotlight embodies its values of curiosity, commitment, collaboration, creativity and courage.



Strong, transparent and accountable institutions which ensure corruption is not tolerated and democracy flourishes both in the UK and globally

Welcome to Spotlight on Corruption's first impact report

In less than four years, Spotlight has gone from start-up to stand-out in an area of public policy that has never been more important

Spotlight on Corruption started in autumn 2019 to bring new perspectives to, and to strengthen, the UK's anti-corruption movement. Spotlight is founded on deep policy and legal expertise particularly in relation to enforcement and the courts. It uses its flexibility as a small organisation to operate strategically and opportunistically when key moments for policy reform arise. This has brought a constructive and bold voice to the movement.

Spotlight is now a well-established part of the anti-corruption landscape. We are recognised as a key partner – one of three alongside Transparency International UK and the Royal United Services Institute's Centre for Financial Crime and Security Studies – on economic crime and corruption issues by civil servants in relevant government departments. We are widely quoted in the media, and often the go-to organisation for journalists on anti-corruption and economic crime issues. And we are frequently cited in Parliament for our research and innovative policy recommendations.

Spotlight on Corruption provides a specific focus on how the UK enforces its anti-corruption laws and whether it is meeting its international commitments on combatting corruption. We work to ensure that the laws are fit for purpose, that they are proactively enforced, and that the UK has robust anti-corruption systems in place across government.

Our unique court monitoring programme is central to our work and provides the evidence base for much of our advocacy and policy work. We also undertake forensic, detailed research – drawing on extensive engagement with other experts and stakeholders – on how the UK enforces its anti-corruption laws and implements anti-corruption systems in line with international commitments. Spotlight's ability to make its mark is based on how we use this research and our court monitoring work to develop pragmatic yet ambitious recommendations for decision-makers in government and Parliament, and to inform public debate on anti-corruption issues.

Spotlight is now a well-established part of the anti-corruption landscape

Spotlight also acts as a major convenor of civil society organisations. As co-chair of the UK Anti-Corruption Coalition from 2019-22, we helped build coordination across the sector and strengthen its collective voice. We now co-chair the Economic Crime Civil Society Organisations Steering Group that provides essential input to the design and delivery of the government's Economic Crime Plans.

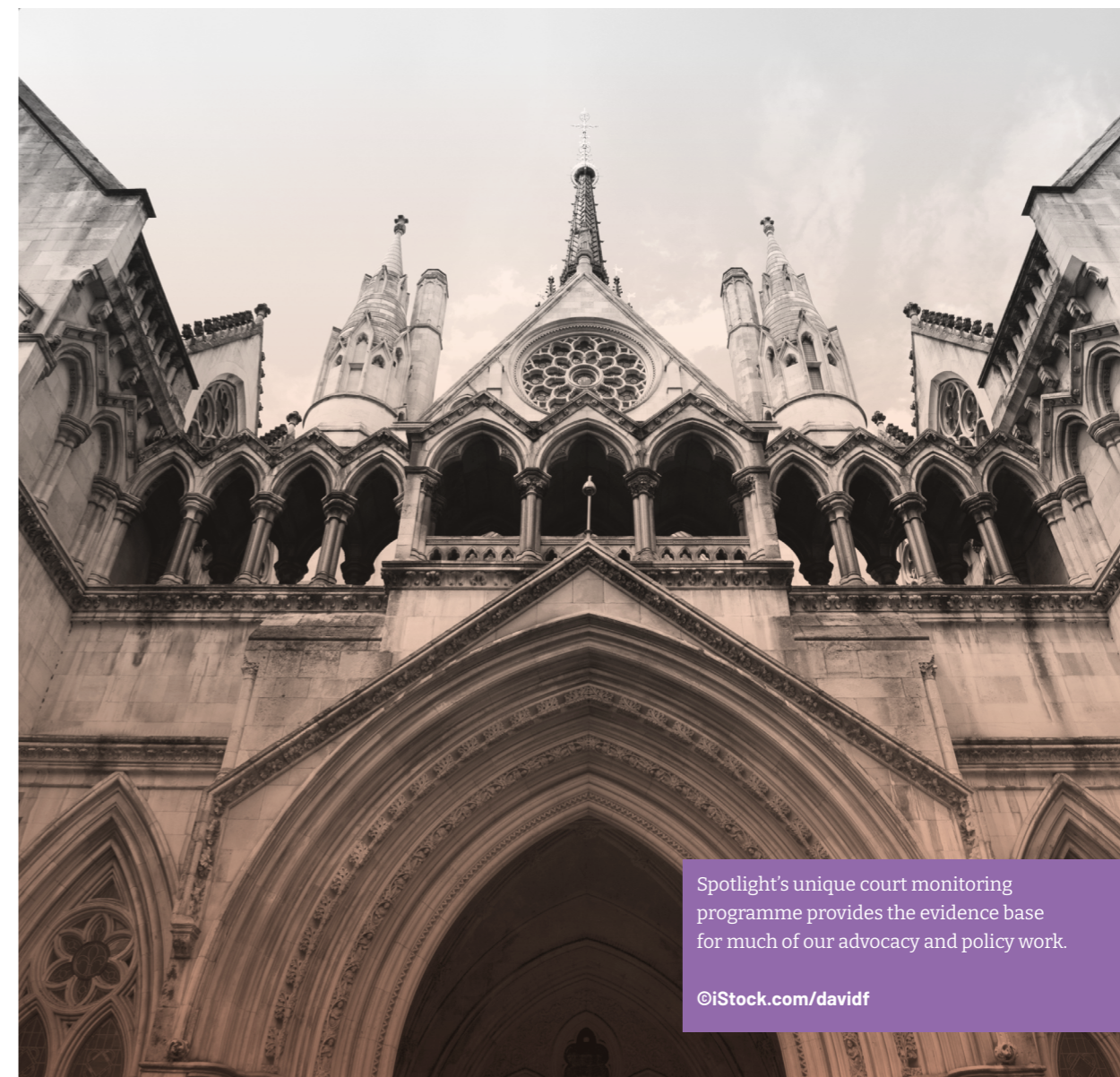
The years ahead will no doubt continue to be both challenging and busy. In keeping with our strong collaborative ethos, we look forward to continuing to work with government, parliamentarians, our civil society partners and others to drive change and achieve the reforms necessary to tackle corruption at home and overseas.

Lloydette Bai-Marrow

Chair of the board

Susan Hawley

Executive Director



Spotlight's unique court monitoring programme provides the evidence base for much of our advocacy and policy work.

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Tackling the UK's dirty money problem

Spotlight plays a key role in helping decision-makers to craft the robust and effective legislation needed to tackle the role the UK plays in facilitating corruption on a global level

Spotlight on Corruption monitors closely how the UK's anti-corruption laws are enforced in the UK courts. In 2021 this monitoring identified major issues with the flagship Unexplained Wealth Order (UWO) regime which the UK government introduced as a so-called "McMafia" tool to tackle dirty money. We subsequently engaged closely with government about the need to reform this regime to make it workable. We were delighted that many of these recommendations were picked up and implemented through the emergency Economic Crime (Transparency and Enforcement) Act rushed through Parliament in March 2022 in response to Russia's full-scale invasion of Ukraine, including a provision to protect law enforcement bodies from adverse costs when seeking UWOs.

Our major report on the UK's legal sector and money laundering rules, [A Privileged Profession?](#), was published in October 2022. The product of months of research, the report revealed that UK law firms face almost zero risk of criminal enforcement if they breach money laundering rules, and very little prospect of meaningful fines. Engagement with government officials and regulators in the process of developing this report helped create momentum for new provisions in the Economic Crime and Corporate Transparency Bill that require legal sector regulators to prevent and detect economic crime, and give the Solicitors Regulation Authority unlimited fining powers.

“*Spotlight on Corruption is one of the most knowledgeable and expert organisations on corruption and dirty money in the UK, and has provided immense support to the APPG on Anti-Corruption & Responsible Tax. Through their combination of primary research, analysis and effective advocacy, Spotlight has become a key player and ally when it comes to advancing effective legislative and policy change.*”

Dame Margaret Hodge MP

Securing the resources to fight economic crime

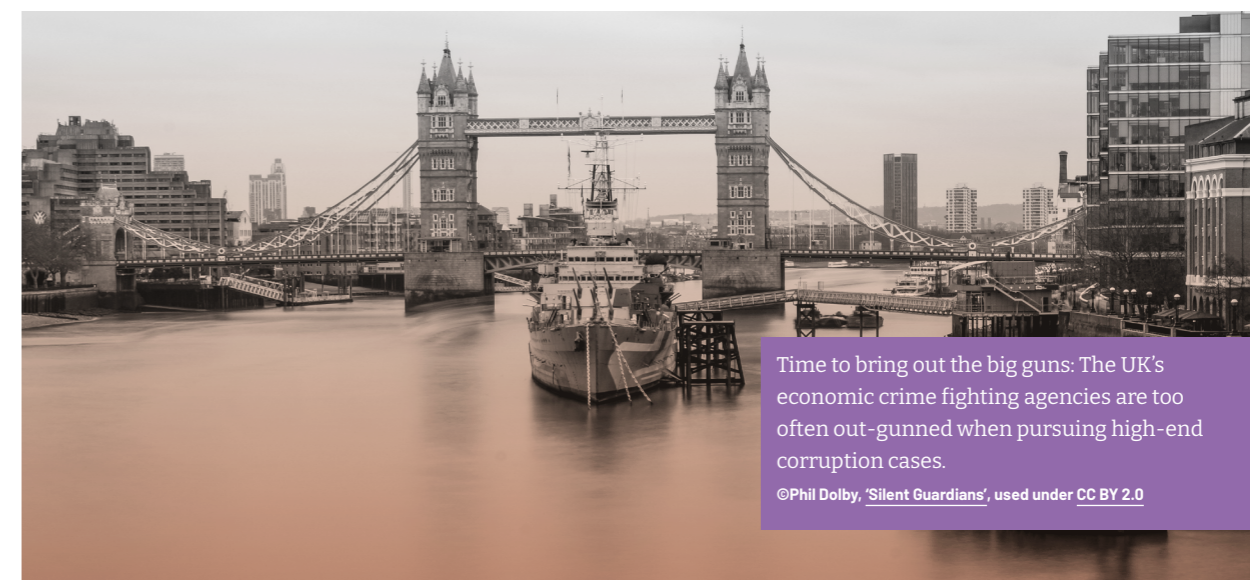
Even the best anti-corruption laws are useless if they aren't enforced. That's why Spotlight advocates robustly for increased funding of the UK's economic crime fighting agencies

Spotlight has monitored and tracked law enforcement resourcing and its impact on outcomes over the past three years.

In January 2022, Spotlight produced a detailed report on UK law enforcement resourcing, [Closing the UK's Economic Crime Enforcement Gap](#). The result of six months of research, the report was widely reported by the media including on BBC Radio 4's *You and Yours*, in the *Financial Times*, and in a film produced by the *Economist*. It has been regularly cited in Parliament since, including in two parliamentary reports and more than a dozen parliamentary debates.

We have also closely monitored how effective one of the UK's top corruption fighting bodies – the Serious Fraud Office – is in practice. From an opinion piece in the *Financial Times*, to press commentary, and parliamentary briefings, we have consistently pushed for more resourcing for the agency to enhance its powers and effectiveness as a key part of the enforcement landscape.

We have closely monitored how effective the Serious Fraud Office is in practice



Defending integrity and ethics in public life

Given the political ethics scandals of recent years and declining trust in politicians, Spotlight has worked closely to reform how ethics in public life in the UK are regulated

In 2021, Spotlight developed an advocacy campaign to raise the temperature on government to introduce stronger rules and regulations for protecting integrity in public life.

From [our own polling](#) and from focus groups commissioned jointly with Transparency International UK on what voters in the so-called Red and Blue Walls thought about recent sleaze scandals, we found voters care deeply about the fact that politicians behave badly even if it's not top of their concerns on a day-to-day basis.

We worked closely with experts to develop the Public Service (Integrity and Ethics) Bill to give ethics regulators stronger powers and more protections. The Bill, drafted by top Parliamentary Counsel, was introduced as a Private Members' Bill by Lord Anderson of Ipswich KBE KC, former Independent Reviewer of Terrorism Legislation, and is awaiting debate.

Closing the UK golden visa regime



In July 2021, we published a briefing, [Red Carpet for Dirty Money: The UK's Golden Visa Regime](#) – which was covered in *The Times* – looking at the ongoing risks inherent in the UK's Tier 1 (Investor) visa regime ('Golden Visas'), which granted preferential visa treatment to people willing to invest large sums of money in the UK. In early 2022, we worked closely with journalists at the *Telegraph* and the *Observer* to highlight the risks of dirty money entering the UK via Golden Visas in several high-profile articles, and with parliamentarians to call for its suspension.

In February 2022, just as Russia invaded Ukraine, the government abolished the regime. Our work helped lay the groundwork for this outcome and we continue to advocate for full transparency about how the government is holding those who abused the regime to account and to ensure that any replacement scheme does not carry the same risks of corruption.

“With energy, integrity and imagination, *Spotlight on Corruption* has totally transformed the battle for integrity in Britain's government and economy. It is already hard to imagine how we managed without its work, and I can't wait to see what it will do next.”

Oliver Bullough, author of *Butler to the World*

We worked with politicians across the political spectrum to get reform. From former Anti-Corruption Champion John Penrose MP's 5-point integrity plan, to helping Labour develop their proposal for an Integrity and Ethics Commission, we've provided expert input to keep up pressure for reform. Our April 2023 ['Integrity Deferred?'](#) report – highlighted exclusively in *Politico's Influence* newsletter – found that two years on from the publication of two major independent reports on improving standards in public life (by the Committee on Standards in Public Life and Sir Nigel Boardman after the Greensill scandal), the government had fully implemented just four out of 57 recommendations.



At a crossroads: we urgently need to raise standards of integrity and ethics across government.

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An end to impunity for big business?

The UK is, at last, poised to enact meaningful corporate criminal liability reforms. Here's how Spotlight helped get us to this point

Prosecutors in the UK operate with one hand tied behind their back when it comes to taking on corporations and their senior executives for economic crimes like fraud and money laundering. Ensuring that corporate bodies can be held to account drives up standards of corporate behaviour.

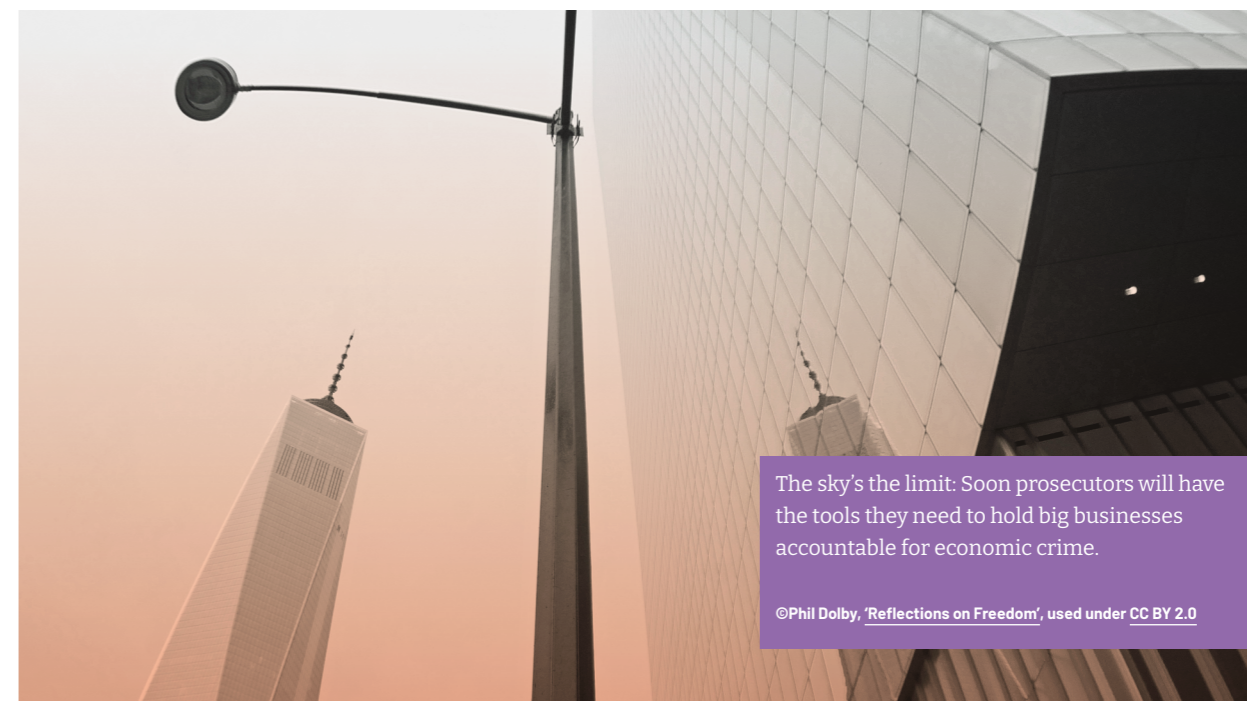
Three years ago, there was little realistic probability of the government ever introducing corporate liability reform. We have worked closely with politicians of all parties to address this crucial legislative gap.

Our extensive advocacy with partners on corporate liability reform helped lay the ground-work for a Law Commission review in 2021, with which we engaged closely. The review found that the current rules for holding corporates to account are “an obstacle to holding large companies criminally responsible for offences committed in their interests by their employees”.

A ‘failure to prevent fraud’ offence has now been introduced to the Economic Crime and Corporate Transparency Bill – a major milestone for the UK. As part of the Bill there is also the potential for a ‘failure to prevent money laundering’ offence to be introduced in the future. Encouragingly, the government has also committed to go even further and undertake more fundamental reform of the underlying rules for criminal prosecution of companies by introducing an amendment to the same Bill – something we have long advocated for.

“Some may think that bribery and corruption are phenomena confined to ‘hot countries’. Not so: they pose a risk to which we must be constantly alert. The work of Spotlight on Corruption since 2019, in terms of fostering cooperation, debate, research, awareness and influencing policy development has been invaluable in that endeavour.”

Sir David Green CB KC, former Director of the Serious Fraud Office



Rooting out dirty money from our politics

Dirty money risks polluting our politics. Over the last two years we have monitored several court cases involving prominent political donors alleged to be associated with corruption or money laundering.

We have worked closely with parliamentarians through briefings to bring attention to serious gaps in the current framework for protecting UK political finance from dirty money and foreign influence. This has included working with Peers to bring forward an amendment to legislation that would require parties to do proper checks on donations to ensure they are not from foreign parties or governments. We secured coverage in the *Guardian*, *Politico* and *Independent* to highlight the need for this amendment.

We have advocated robustly, through briefings, press commentary and submissions, for political parties to do proper checks on donations and to understand where the money is ultimately coming from. This has included developing a ‘know your donor’ policy with experts, which we are currently consulting on. Such a reform was supported in an editorial in *The Times*, following our engagement, and our comment piece in *Metro* laid out the importance of such reforms in light of upcoming elections in the UK.

Making the most of the UK's new sanctions powers

The introduction of the Global Anti-Corruption Sanctions regime in April 2021 was a landmark moment. Spotlight worked closely with civil society partners to shape the regime, and push for its ambitious use

Russia's 2022 invasion of Ukraine led to a large expansion in the use of sanctions by the government, but also consumed most of its sanctions capacity. We have worked with civil society partners to highlight gaps in enforcement of the regime and apply pressure on government to improve its sanctions response. Our press commentary included appearing on BBC Radio 4's flagship *PM* programme to analyse new sanctions laws, contributing to a front-page story in the *Financial Times* highlighting poor enforcement of financial sanctions by the Office of Financial Sanctions Implementation and an investigation with *The Times* which showed that subsidiaries of sanctioned companies can still sponsor UK visas.

Our briefings to Parliament were picked up by the Foreign Affairs Committee which reflected some of our key recommendations to improve sanctions implementation and enforcement in its 2022 report on illicit finance. We have also been monitoring challenges to UK sanctions designations in the courts to look at how they are shaping the regime. This included a key sanctions evasion case which exposed generous basic needs allowances from frozen funds for sanctioned oligarchs.

In response to calls from parliamentarians to not only freeze oligarchs' assets but seize them as well, we worked closely with colleagues at the Royal United Services Institute to brief parliamentarians on potential solutions. This included developing a proposal to improve confiscation arising from sanctions evasion which received strong support in Commons and Lords debates on the Economic Crime and Corporate Transparency Bill.

“ *Whether it's increasing transparency of court proceedings, highlighting weak political accountability or inaction on dirty money, Spotlight's approach to UK system reform carries an authority and credibility which belies their size.*”

Helena Wood, Royal United Services Institute

Barring corrupt firms from public procurement



Excluding companies that engage in wrongdoing or provide shoddy services on public contracts is a crucial way to protect taxpayers' money and to encourage better corporate behaviour. However, the UK has rarely used its current powers to do so and there is little public awareness about its effectiveness as a tool.

In November 2020, we engaged in pre-action legal correspondence with the government seeking to have one of the big four accountancy firms, EY, excluded from public contracts after repeated scandals about its failure to detect money laundering and other wrongdoing. The letter, which was covered by the *Guardian*, led to extensive engagement with EY by government officials. While EY didn't get excluded, shortly after, the government threatened another accountancy firm, KPMG, with exclusion if it did not improve its act, after a series of fines for misconduct.

Spotlight has gone on to work closely with academics, experts and civil society colleagues in the UK Anti-Corruption Coalition, to push for a stronger post-Brexit procurement regime in the new Procurement Bill.

The Bill will for the first time establish a central debarment register for the UK which is a significant step forward. Encouragingly, more recently the government has shown some willingness to actively use debarment in the case of Bain and Co, a consultancy company implicated in state capture in South Africa.

During the COVID-19 pandemic, procurement became a headline issue with recurring scandals about contracts for PPE equipment and the use of a "VIP" lane (for those firms that had personal contacts with ministers and MPs). Through our Freedom of Information work, we helped expose how over half of PPE procured during the COVID pandemic through the "VIP lane" was not fit for purpose – illustrating how the use of such approaches in emergency procurement was at the root of poor buying decisions.

Champions of open justice

Spotlight works hard to make sure that the courts are as transparent as possible so that the public can know how justice is being conducted

Spotlight has worked extensively to advocate for open justice both at a policy level and through regular interactions and applications in the courts. We worked with partners to get the government to commit to more ambitious proposals on open justice as part of the Open Government Partnership, which contributed to the government launching a central public registry of court judgments at the National Archives. Our calls for better access to court documents, enhanced case listing information, and continued investment to improve remote access to hearings were taken up by the Justice Committee in their November 2022 report “Open justice: court reporting in the digital age”.

We diligently monitor corruption cases across a range of courts

We diligently monitor corruption cases across a range of courts – regularly attending hearings, collecting court documents, and making numerous successful open justice applications, including challenging anonymity orders. Our unique court monitoring programme is the bedrock of our work, and we use the information we gather as the evidence base for our analysis of how enforcement works in the UK. We are regularly cited in the press for our commentary and analysis on court cases.

“*Spotlight on Corruption has been a vital partner to Transparency International UK in pushing for change on UK corruption. We’ve particularly appreciated their technical breadth, court case monitoring, and the gap they’ve filled on advocacy around open justice and victims compensation.*”

Rachel Davies-Teka, Transparency International UK

Seeking compensation for victims of corruption



The victims of corruption – whether it be communities blighted by shoddy corrupt contracts, or people subject to autocratic regimes sustained through money laundering schemes using the UK financial system – rarely get a look in. We have worked closely with civil servants and law enforcement agencies, and through partnerships with southern civil society groups, to identify the legal barriers to compensation and propose reforms based on emerging best practice. There is now considerable work and serious attention being given to these issues, including through a new cross-departmental working group on compensation and a new cross-government policy on how to return assets to origin countries in an accountable and transparent way.

Working closely with our civil society partners in the Global South, we have used opportunities arising through our court monitoring work to raise the profile and voices of victims in particular cases, as well as calling for the timely return of confiscated assets to origin countries. This has included convening a broad coalition of southern NGOs to write joint letters urging the Serious Fraud Office and the government to compensate victims of mining giant Glencore’s corruption.

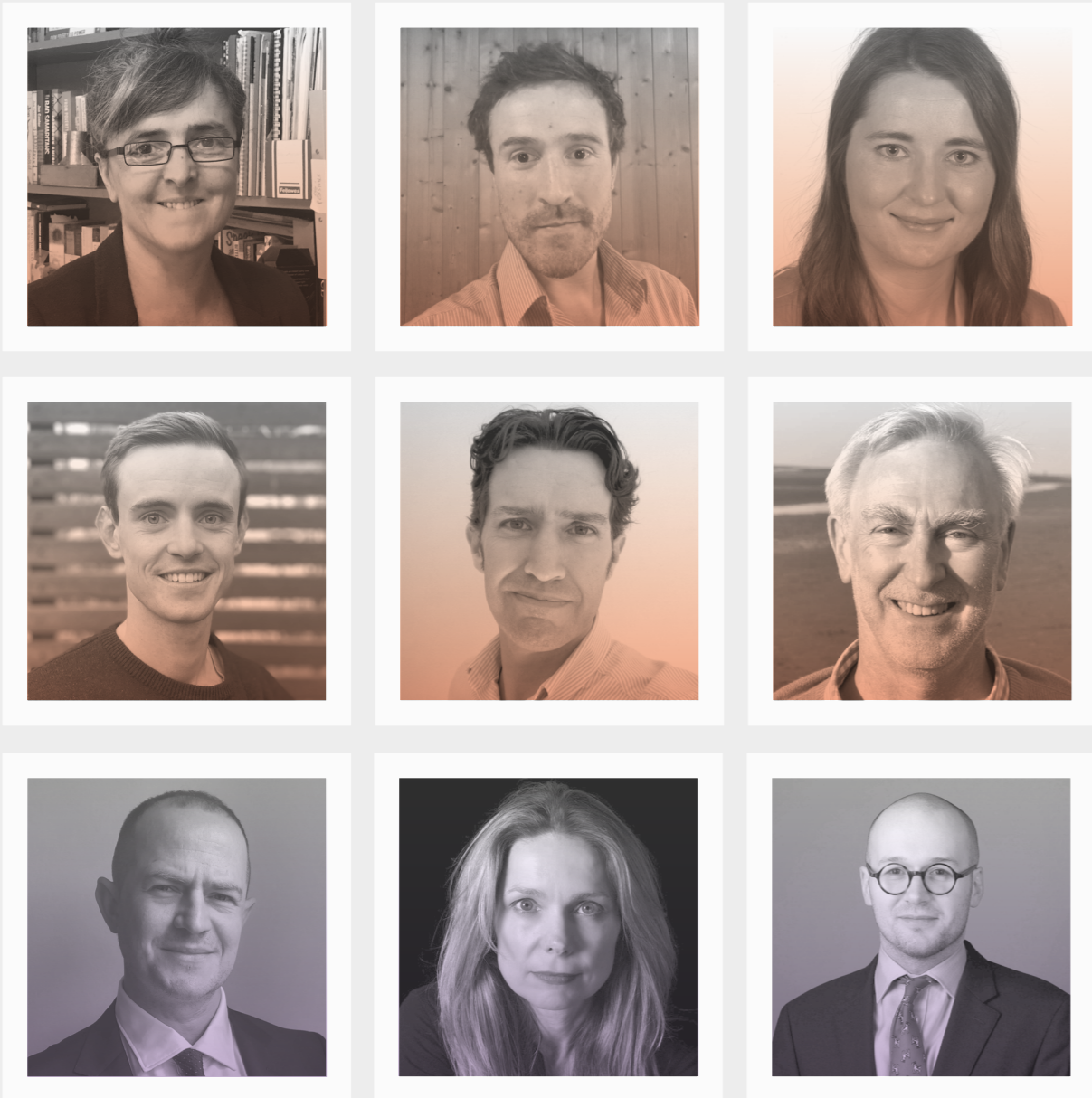


Opening doors: Spotlight advocates for reforms to make the courts system more transparent.

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Who we are

Introducing Spotlight's team of dedicated anti-corruption professionals



The Spotlight team

Associates

Dr Susan Hawley
Executive Director

Susan is an anti-corruption expert who has researched and campaigned on the UK's role in facilitating global corruption for over 20 years. Her work has included challenging the decision to drop the investigation into the BAE Systems/Al Yamamah scandal, and being part of efforts to ensure that corporate liability was included in the Bribery Act. She is a founder of Spotlight on Corruption, having previously worked at Corruption Watch UK, The Corner House and Christian Aid on corruption issues.

George Havenhand
Senior Legal Researcher

George is a UK-qualified solicitor and investigative researcher. After working as a litigator at a London-based firm, he joined legal action charity Reprise to focus on the death penalty, drug policy, fair trial standards and British complicity in human rights abuses overseas. George held previous roles at the Charity Commission, NHS and Cafcass, and as chair of a mental health charity.

Dr Helen Taylor
Senior Legal Researcher

Helen leads Spotlight's court monitoring programme. She previously worked at the Judicial Commission of Inquiry into Allegations of State Capture, Corruption and Fraud in South Africa, and has also clerked at the South African Constitutional Court. Helen completed her DPhil in Law at the University of Oxford, and is a research associate at the South African Institute for Advanced Constitutional, Human Rights, Public and International Law at the University of Johannesburg.

James Bolton-Jones
Advocacy Advisor

James is an advocacy advisor with private and public sector experience in investigative and policy research on corruption and financial crime. He read modern and medieval languages (French, Russian and Ukrainian) at the University of Cambridge, and has an MA in Russian and Post-Soviet Politics from UCL School of Slavonic and East European Studies.

Alex Beatty
Communications Advisor

Alex has more than 25 years of experience in communications, from business-to-business journalism, contract magazine publishing and freelance writing, to in-house public-sector communications. His recent experience has included leading communications efforts for the UK's network of diplomatic posts in Australia and delivering two key strategic communications projects in Bosnia & Herzegovina.

Nigel Taylor
Finance & Operations Advisor

Nigel has worked with not-for-profit organisations for more than 30 years, with significant roles at Oxfam GB and Tearfund, and a focus more recently on supporting emerging organisations. He leads on financial and grant management, human resources and provides strategic thinking to the Spotlight team and Board of Trustees. His passion for tackling corruption stems from following its devastating impact in South Africa.

Dr Daniel Beizley
Associate

Daniel is a criminologist whose PhD on the European Investment Bank was shortlisted for the Dutch Society of Criminology's Willem Nagel prize in 2022. Daniel joined Spotlight in 2019 and since then has produced research on enforcement resourcing, conflicts of interest in public procurement and anti-money laundering supervision in the legal sector. He is an ACAMS accredited sanctions analyst.

Megan Davis
Associate

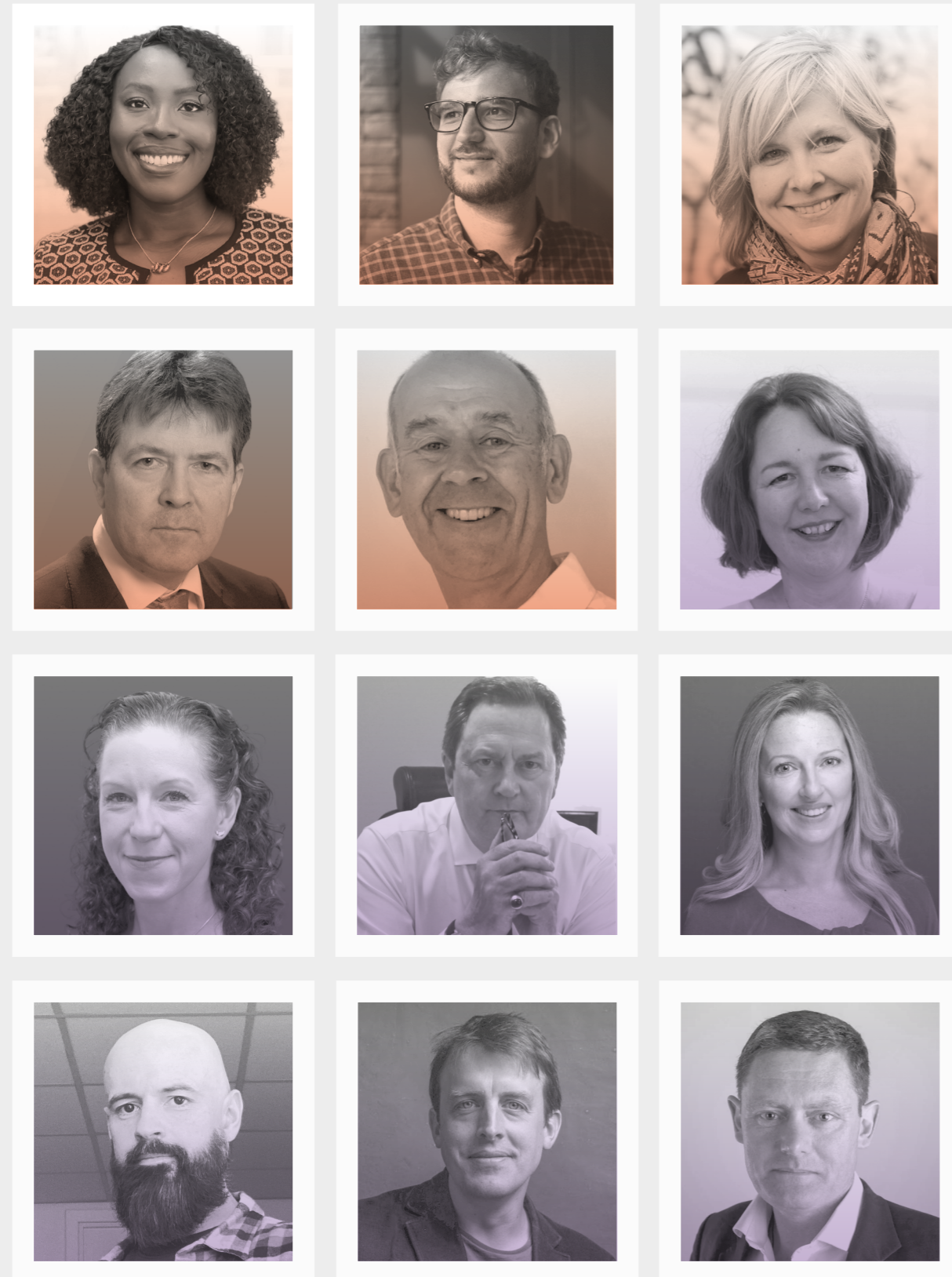
Megan worked as a corporate and commercial lawyer at major international law firms, and has had extensive experience in-house as a media lawyer in the film and TV industry. She has had personal experience as a whistleblower in the financial services sector, and subsequently worked as an adviser to a UK charity providing support for public interest whistleblowers.

Joseph Sinclair
Associate

Joseph is a pupil barrister at a criminal and public law chambers in London and has a background in public and human rights law. He joined Spotlight on Corruption as an intern in February 2020, and assists as a researcher in asset recovery, sanctions and financial crime.

Expert governance and guidance

Introducing Spotlight's distinguished board and our panel of expert advisors




The board

 **Loydette Bai-Marrow**
Board member


Loydette is an anti-corruption expert and economic crime lawyer. She is the Founding Partner of Parametric Global Consulting, a white collar crime investigations consultancy. A former Principal Investigative Lawyer at the Serious Fraud Office, Loydette has also worked at the Crown Prosecution Service and HM Revenue and Customs.

 **Jon Date**
Board member

Jon has over 10 years' experience in campaigning, advocacy and communications on a range of issues including corruption, international development and climate change. He currently works at di:ga Communications, providing media and strategic communications advice to not-for-profits.

 **Josie Stewart**
Board member


Josie is Director of Transparency International's Global Defence and Security Programme, which advocates for governments and arms transfers to be transparent, accountable and free from corruption. Before that, Josie established and led the Foreign, Commonwealth and Development Office's team on combatting illicit finance.

 **Sam Eastwood**
Board member

Sam is a Partner in Mayer Brown's litigation practice in London and a member of the firm's white collar defence and compliance practice. Sam advises on ethics, anti-corruption, economic sanctions, anti-money laundering and human rights issues in the context of investigations, transactions and compliance programme development.

 **Angus Brown**
Board member

Angus is a Chartered Accountant and member of the Expert Witness Institute. Angus gained over 20 years' experience as a Director in the Forensic Services team at a leading consultancy firm, where he successfully led teams on high-profile corruption investigations and disputes both in the UK and overseas.

 **Prof. Elizabeth David-Barrett**
Advisor


Liz was Spotlight's inaugural Chair from July 2019 until stepping down in April 2022 to take up a position at the International Anti-Corruption Academy in Vienna as Head of the Global Programme on Measuring Corruption. Liz's commentary on corruption issues has been appeared in the *Guardian*, *Financial Times* and *Le Monde*.

 **Helena Wood**
Advisor


Helena is an Associate Fellow of the Royal United Services Institute's Centre for Financial Crime and Security Studies and a consultant on anti-money laundering and asset confiscation in the UK. Before that, Helena held positions in the National Crime Agency, HM Treasury and the Charity Commission.

 **Sir David Green KC**
Advisor


Sir David was director of the Serious Fraud Office between 2012-2018, and prior to that director of Revenue and Customs Prosecutions, after 25 years in practice at the criminal bar. He is currently a partner at Cohen and Gresser, as well as being Chair of the Fraud Advisory Panel.

 **Tamlyn Edmonds**
Advisor


Tamlyn is a Founding Partner of Edmonds Marshall McMahon, a specialist private prosecution law firm. She is an experienced prosecutor, formerly prosecuting for a Government department, and since 2012 she has specialised in private prosecutions in cases of serious fraud, corruption, cross-border fraud and cyber-crime.

 **Dr Nicholas Lord**
Advisor

Nicholas is Professor of Criminology at Manchester University. He has research expertise in white collar and corporate crimes, as well as the organisation of serious crime for financial gain.

 **Oliver Bullough**
Advisor

Oliver is an award-winning investigative journalist specialising in the area of corruption. He is the author of *Moneyland* and *Butler to the World*. Oliver has written extensively in newspapers on issues of financial transparency and corruption.

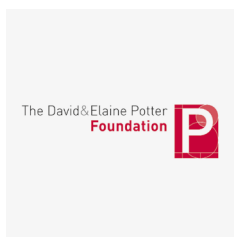
 **Jon Benton**
Advisor

Jon is a former senior detective who led the Metropolitan Police's Proceeds of Corruption Unit and was latterly joint-head of the International Corruption Unit, NCA from 2009-2016. He is the founder and director of global asset tracing firm Intelligent Sanctuary.

Our advisors

Spotlight on Corruption's work would not be possible without the generous support of our funders and partners. **Thank you all.**

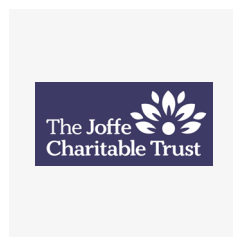
Funders



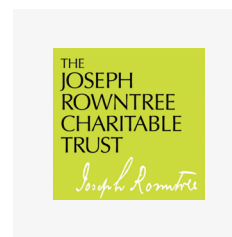
The David and Elaine Potter Foundation



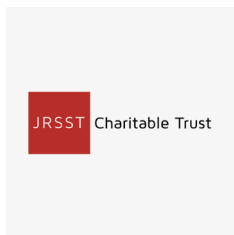
John Ellerman Foundation



The Joffe Charitable Trust



The Joseph Rowntree Charitable Trust



The JRSST Charitable Trust



Luminate Foundation

We are also grateful to the support of the Open Society Foundations which has supported some of the work described in this report, both directly and via subgrants through Transparency International UK and Redress.

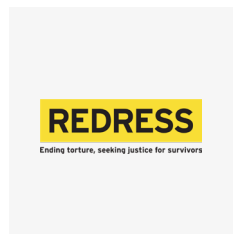
Partners



UKACC



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REDRESS



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