

# Spotlight on Corruption strategy 2022-2025

## *Introduction*

Spotlight on Corruption was set up in the Autumn of 2019 to expand and strengthen the anti-corruption movement in the United Kingdom. Three years on, Spotlight has become a well-established and influential anti-corruption voice in the UK. This strategy lays out where Spotlight intends to take its work over the next three years and how it will do so.

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 combating corruption. The UK plays an outsized role as a global financial centre in facilitating corruption around the world. It also has the potential to play a strong leadership role in fighting corruption. We work to ensure that UK anti-corruption laws are fit for purpose, that they are proactively enforced, and that the UK has robust anti-corruption rules in place across government.

Spotlight acts as policy entrepreneurs developing innovative, ambitious and workable policy proposals for reform and informing public debate in the UK on anti-corruption issues. We take a realistic but radical approach to reform. We develop proposals for reform through forensic, detailed research, drawing on extensive engagement with stakeholders and on our court monitoring program which is central to our work. Our court monitoring program collects the documents from, and develops analysis on the most important corruption trials in the UK courts, providing a robust evidence base for much of our advocacy and policy work. Our team is embedded in wide policy and advocacy networks that allow us to act as a critical friend to law enforcement and government, and to exert influence early in the policy making process.

Although Spotlight has grown to a seven-person organisation over the past three years, we remain intentionally small and agile with a commitment to grow sustainably and in a manner that continues this ethos. Our strengths lie in the expertise, complementarity and dedication of our staff, our willingness to challenge orthodoxy and be outspoken where needed, and our commitment to extensive collaboration with all those who wish to end impunity for corruption.

## *Niche*

Spotlight is one of only two non-governmental organisations alongside Transparency International UK that focuses on a wide range of anti-corruption issues within the UK. We are part of a broader coalition, the UK Anti-Corruption Coalition (UKACC), which

Spotlight helped to develop and grow, bringing together different UK organisations who have anti-corruption as part of their mission, to leverage our collective voice to influence UK government policy.

Spotlight's niche lies in the deep technical expertise it brings to the table (from corporate liability and law enforcement resourcing to victim compensation and standards in public life) alongside its robust advocacy style and tactics (from extensive use of freedom of information requests and willingness to use strategic litigation) in holding the government to account, and its role as a convenor in the anti-corruption movement.

We work closely, including joint research and initiatives, with other experts and civil society groups in the field where our agendas coincide, whether with RUSI's Centre for Financial Crime and Security Studies and tax justice groups on illicit finance issues and economic crime, with the Institute for Government and Constitution Unit on issues of UK standards and ethics, and with Redress on the UK Sanctions regime. And we are also embedded in various civil society coalitions. This collaborative working enables civil society working on anti-corruption issues to pool resources and add up to more than a sum of its parts.

#### Spotlight's Mission

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

***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.***

***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.***

#### A. Spotlight's external context

This three-year strategy takes place in the context of significant domestic and global uncertainty. Brexit, closely followed by the COVID pandemic, the resulting economic fallout from both, and the recent reinvasion of Ukraine by Russia have created significant political and economic turbulence at home and abroad and make predicting the external context for the next three years difficult.

While this context has brought challenges it has also brought opportunities. Sweeping reviews of UK legislation such as procurement and sanctions have allowed the UK to go further and faster than EU law allowed in areas such as having a debarment regime and introducing a specific anti-corruption sanctions regime. Russia's full invasion of Ukraine generated extensive public debate and policy thinking about closing down the UK's vulnerabilities to kleptocratic wealth, resulting in long-awaited reforms being brought forward.

### *Political context*

The UK has long been a magnet for dirty money and its National Crime Agency estimates that up to £100 billion of money laundering impacting the UK occurs every year. Russia's full invasion of Ukraine has highlighted in an unprecedented way the very real risks that a laissez faire attitude to attracting wealth and investment at all costs brings. The unprecedented attention on how Russian oligarchs and other kleptocrats have bought influence and access across UK institutions has also exposed the serious national security risks this poses but also created new opportunities for change. It has generated renewed and very welcome political will across the political spectrum to take action against kleptocracy and to show global leadership on anti-corruption issues.

Recent and recurring political scandals, not least arising from the government's handling of the COVID pandemic, have meanwhile given the issue of domestic corruption and sleaze unparalleled exposure and importance in the UK. The perceived handing of COVID-related contracts to cronies, breaches of COVID laws by senior politicians, coinciding with a populist leadership mounting multiple challenges to, and showing an unwillingness to abide by, established norms and institutions, created – according to many experts – a crisis of standards in the UK. The idea that the UK is itself corrupt has entered political discourse in new ways and generated real debate about how systemic reforms are needed to protect the integrity of our political system and the health of our democracy.

Over the course of the three-year plan there will be a general election in the UK. The proximity of an election will shape political decision-making both by the government and opposition parties over that period. This will present opportunities to advocate for reform and present clear policy reform ideas for inclusion in manifestos. It does bring risks on the downside that anti-corruption issues, which tend to be less salient to voters than immediate economic circumstances and health, may get drowned out.

### *Economic context*

The economic fall-out from COVID and the energy crisis created by Russia's reinvasion of Ukraine pose significant challenges to Spotlight and its mission. The resulting cost of living crisis is likely to dominate most economic decision-making and policy over the next three years with heavy limits on public spending which will impact upon law enforcement bodies and the civil service. On the other hand, this will create new opportunities for public debates about the importance of transparency and integrity in public spending, as public resources are scarce.

Meanwhile, the economic policies of a new administration focused on maximising the 'Brexit dividend' through deregulation will create new risks that a race to the bottom on regulation is seen as desirable to attract inward investment at whatever cost and from whatever source. This could seriously undermine the economic crime agenda developed by the government but may also give rise to new opportunities for real debate about what kind of regulation is needed and the appropriate role of regulators in protecting the UK from these risks.

The fallout from Brexit will increase pressure on UK companies to export to jurisdictions that are high-risk for corruption, while Free Trade Agreements with countries with significantly lower anti-corruption standards than the UK's are likely to open up UK markets to greater risk of corruption. Where there is capacity, the anti-corruption movement in the UK has an opportunity to promote new and stronger anti-corruption clauses in these agreements, and play a role in monitoring their impact.

On an organisational level, it is not clear yet how the general economic situation including increased inflation will affect Spotlight's ability to fundraise and grow as an organisation as budgets and staff salaries are adjusted to reflect inflationary pressures.

### *Societal context*

Recent polling by *More in Common* suggests that there is growing and deep disillusionment with, and disengagement from, government and politics. This may give rise to an increase in greater populism, the rise of far-right politics, and a general disinclination to support or defend democratic institutions that are essential for tackling corruption. Younger voters in particular appear uninterested in anti-corruption issues, and as yet there is no anti-corruption organisation that undertakes public-facing campaigning or education to address this gap. Making corruption issues count with the general public has always been challenging, and may get even more so if this trend in society gets embedded further. It will be important for Spotlight and others in the anti-

corruption movement to look at whether there are new ways of communicating its messages and reaching broader audiences to address this.

### *Technological context*

The current government has designs to make the UK Europe's Silicon Valley and a global tech powerhouse. The use of crypto-assets and the role of the fintech (Financial technology) sector in facilitating and preventing money laundering is a key emerging area which will change the nature of how financial crime is committed. This will require additional expertise and resourcing for regulators and enforcement and will emerge as an area which the anti-corruption movement will need to get a better handle on. Meanwhile the ability of enforcement bodies to use new technologies, such as Artificial Intelligence, and to have up to date, cutting edge, IT platforms and tools will be critical in the fight against economic crime.

For Spotlight as an organisation, new technological challenges may be posed to our IT security by hostile actors while new technologies may present opportunities for us to organise our work and communicate our messages more effectively.

### *Legal context*

A strong deregulatory agenda may pose considerable risks to UK anti-corruption legislation and rules, while spending limits may undermine the effectiveness of enforcement of and adherence to this legislation.

Growing political will to tackle the use of defamation threats (known as Strategic Litigation against Public Participation or SLAPPs) may be a game-changer in allowing anti-corruption organisations to put more detailed investigations in the public domain. On the other hand, mooted moves by the government to restrict the use of judicial review and growing judicial conservatism may make using strategic litigation as an advocacy tool harder to consider or more costly to bring. Given that Spotlight on Corruption regularly reviews whether strategic litigation may be appropriate this may have considerable impact on our work.

### *Environmental context*

The growing climate crisis will create new corruption risks, whether in public spending on adaptation measures within the UK or through climate funding for other jurisdictions. Tackling these risks will become increasingly important and urgent. There are opportunities with additional capacity to ensure that bodies that provide funding and

government support for climate change measures whether in the UK or abroad have sufficiently addressed the damage that corruption could cause to the effectiveness and reputation of these measures, and to public confidence in how government is addressing what will become an ever growing emergency. Spotlight will need to review what its unique role could be with its current skillset in tackling these risks and how it can rise to the challenge of addressing them.

## B. Spotlight's Theory of Change

Spotlight on Corruption's theory of change is predicated on the assumption that proactive enforcement of the law, robust implementation of anti-corruption regulations and policies, and strong independent institutions both in law enforcement and among regulators are critical to fighting corruption and promoting and protecting integrity.

This requires strong political will within government, buy-in from civil servants who advise ministers, engaged and proactive enforcement bodies, a public narrative through media and commentary that tackling corruption is a priority, and strong support and interest within Parliament.

It also requires a strong evidence base, coordinated messaging and policy recommendations from civil society, and regular media stories to drive interest and spur action.

Spotlight on Corruption builds the evidence base for its work through detailed research, particularly by monitoring the UK's enforcement bodies and court cases arising from the UK's anti-corruption laws. From this monitoring, we develop the case for policy and legislative reform to address weak enforcement and poor implementation of the law.

We disseminate our research and recommendations through reports, detailed briefings, blogs and media commentary. We engage closely with law enforcement and experts in the legal and academic communities to test our recommendations. And we proactively engage through authoritative briefings with government officials, law enforcement and parliamentarians.

We work closely and extensively with journalists to drive media interest in corruption related topics, and to set the agenda for public narratives about tackling it. Additionally, we undertake investigations where relevant and make extensive use of Freedom of Information requests to seek evidence from the government and hold it to account. Where appropriate, we explore strategic litigation as a means to achieve our advocacy goals of stronger enforcement and better implementation of anti-corruption policies.

Finally, we work closely in collaboration and coordination with other civil society actors to maximise and leverage influence, often acting as a convenor of disparate civil society groups on different issues. We strongly believe that collaborative work and strategic coordination within civil society is essential to bring about change.

### C. Spotlight as an organisation

Spotlight's values around which our work is based are: Collaboration, Commitment, Curiosity, Creativity and Courage.

Spotlight's strengths include:

1. Our ability to be agile and nimble in our response to opportunities and events. Spotlight's size allows it to react quickly to developments and maximise opportunities, taking an unbureaucratic approach to work.
2. Our highly strategic and pragmatic approach to achieving impact and change. Spotlight believes in constructive engagement while maintaining a critical voice. We are also committed to patiently and persistently pursuing change.
3. Our strongly collaborative ethos and team work. Spotlight is committed to collaborative work with civil society partners, and other stakeholders, both in the UK and with partners from the Global South. We are also committed to maintaining an exceptional team working ethos, and building this further.
4. Our credibility which is rooted in our expertise on our subject areas and our constructive engagement approach. Spotlight's work is based on in-depth and forensic research and evidence-gathering, working with experts, and drawing on our own in-house expertise, to formulate policy recommendations and insights.
5. Our highly engaged and expert Board. Spotlight's Board provides dynamic and robust governance and we are committed to ensuring Spotlight has first-rate governance and accountability.
6. Our track record of achieving impact. From helping create the political space to close down the UK's golden visa regime, to shifting the debate on corporate liability reform, our work has helped shape the UK's anti-corruption policy landscape.

Spotlight's challenges include:

1. Managing the balance between responding to urgent reactive work, and maintaining focus on long-term goals and commitments.
2. Ensuring we ruthlessly and strategically prioritise to ensure we do not seek to fight too many battles at once and are as effective as possible.
3. Finding ways to benefit from the contributions of those who would like to work with us on a pro-bono or voluntary basis.
4. Communicating our messages more effectively and in a more accessible way.
5. Ensuring we engage more effectively in horizon-scanning and scoping networking opportunities to ensure that we are more prepared and proactive in setting ourselves up to be in a position to influence.
6. Developing our internal infrastructure to make sure that we capture our impact and establish systems, policies and structures for staff development, and ensure that Spotlight is a learning organisation with effective monitoring and evaluation.

#### D. Spotlight's work

Spotlight's long-term goals around which our work is framed and which we will work towards over the next three years are that:

1. **The UK has a robust legislative and regulatory framework for prosecuting and sanctioning corruption and financial crime**

Over the next three years, we will work to ensure that the UK has best practice standard anti-corruption legislation and regulation. This will mean working to ensure that:

- Large firms and their senior executives can and will be held to account for corruption, economic crime and money laundering - through the introduction and implementation of more robust corporate liability legislation;
- The UK has a strong framework for supervising and regulating firms for money laundering - through reform of the current fragmented and ineffective supervisory regime and a greater focus on effective enforcement of regulatory standards;
- The UK has a strong asset recovery framework to ensure that more corrupt wealth is confiscated and returned to those from who it was taken - through increased enforcement against corrupt wealth;
- The UK strengthens its laws for domestic corruption to ensure that those who abuse power can be held to account - through serious consideration of new legislation that covers trading in influence and corruption in public office.



## **2. The UK has more proactive, properly resourced, transparent and effective enforcement of its anti-corruption laws**

Over the next three years, we will work to ensure that:

- UK law enforcement bodies are appropriately resourced to do the job - through maintaining pressure on the government to reinvest more of the money that law enforcement brings in back into the agencies;
- The courts in England and Wales enhance and practise open justice and that there is robust transparency in corruption cases in the courts of England and Wales - through the creation of our court document database and ongoing open justice advocacy;
- The courts of England and Wales and UK government recognise the harm caused by corruption and suffered by its victims - through concrete steps to redefine harm to include social damage, and greater representation of that harm in the courts.

## **3. The UK governments puts in place stronger anti-corruption measures to tackle corruption at home and abroad**

Over the next three years, we will work to ensure that:

- The UK's framework for upholding and regulating standards in public life, including party political donations, is strengthened to ensure integrity in government - through our work on promoting stronger checks on political donations, and on giving standards regulators stronger independence and powers;
- The UK's Global Anti-Corruption Sanctions regime is used robustly as part of a range of anti-corruption measures to tackle impunity for corruption - through our work with colleagues in the UKACC sanctions working group to monitor the use of sanctions and improve sanctions legislation and enforcement;
- The UK has enhanced anti-corruption provisions in its procurement processes so that corrupt companies do not receive contracts, and so that conflicts of interest do not undermine the integrity of procurement - through our work monitoring debarment of corrupt companies and how conflicts of interest in procurement are managed.

## **E. Spotlight's organisational development**

Over the next three years Spotlight will:

- 1. Invest in our staff, while maintaining a small dynamic team.** Spotlight's small size is key to its ethos and we will seek to grow sustainably while maintaining this ethos. Over the next three years, we will seek to retain and nurture our existing talent and develop an exceptional team working environment. This will include ensuring that staff can develop in their roles, are recognised and respected for their work, and have a safe space to develop personally.
- 2. Communicate our messages and our work more effectively and authoritatively.** Spotlight will make strides in getting its messages across to a wide range of audiences including through its website and social media. We will train more of its staff to do media work, and ensure that the person with the expertise communicates the message.
- 3. Deepen our networks with a wide range of stakeholders.** From Parliamentarians, to civil servants, to law enforcement officials, to allies in the private sector, to academic experts, to non-governmental organisations in the Global South and North, Spotlight will seek to build its collaborations and engage constructively to deepen consensus on reform and bring about change.
- 4. Foster and maximise avenues for more pro bono support.** There are a huge number of people keen to give their expertise and time on a pro bono basis to the anti-corruption movement. We will develop our research associates programme to bring additional capacity and expertise, develop our relations with law schools and law firms to make sure that Spotlight is offering a home to those that want to offer their time and skills.
- 5. Strengthen our operational functions and support.** Spotlight's growth means that it now needs to create stronger structures and policies to ensure that our governance, policies, and processes run smoothly and efficiently. This will reduce the strain on our staff, ensure our Board can deliver good oversight and governance, and ensure we can more effectively monitor our impact and report to funders.
- 6. Maintain organisational sustainability.** Spotlight will develop our fundraising, including creating new relationships, to ensure our sustainability as an organisation going forward. Fundraising will be the job of all staff, with help from the Board.

**7. Commit to enhancing diversity, equality and inclusion across our work.**

Spotlight will embed a diversity, equality and inclusion policy across all its work, from recruitment, to Board composition, to external work that we do.

**8. Develop our monitoring, impact tracking and evaluation processes to become a genuinely learning organisation.** Spotlight will establish stronger processes and set up more opportunities to track whether and how we are making impact, and to learn from our mistakes and successes to enhance our work.