



Spotlight on Corruption Three-Year Strategy 2025-2028

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.

HOW WE DO THIS:

We highlight the harms of corruption and campaign for ambitious, evidence-based reforms to ensure the UK has strong laws and systems of accountability that are robustly enforced.

OUR VALUES:

Curious, rigorous, collaborative, courageous

Context for the new strategy

Now more than ever powerful anti-corruption voices are needed in a fragmented world facing an uncertain future.

We are in a new geopolitical era where old certainties are crumbling away. Democracy is under threat globally, with the rise of far right populism and ultra nationalism.

The social contract between elected governments and their people has been stretched to breaking point, exacerbated by political corruption scandals. The resultant fall in public trust in government in western democracies is feeding greater tolerance of autocratic governments and extreme ideologies with corruption increasingly weaponised in the process.

Internationally, traditional alliances are being strained and realigned, and a multipolar world with new centres of power has emerged. This is leading to an erosion of established international

norms and makes developing international consensus on how to tackle the world's challenges – not least corruption – ever harder to achieve.

And the world does face enormous challenges – from the rise of Artificial Intelligence to the climate emergency which may change the way that everyone lives and works. Corruption and lack of political integrity can undermine how the world responds to these developments.

Tackling corruption – the abuse of entrusted power for private benefit – is central to creating a more hopeful future. This includes working to build and defend trust in democratic norms such as the integrity of politicians and elections, greater citizen participation in government decision-making, and a robustly independent third sector and media.

It also means working for an end to impunity for corporate misconduct and for corrupt actors who loot assets from impoverished communities, as well as those who enable them to do so such as lawyers, accountants and other service providers.

There are seeds of hope. Tackling corruption and illicit finance has had strong cross-party support within the UK over the past few years. The current government has made some crucial commitments to restoring public trust, preparing a new Anti-Corruption Strategy and working with international partners to tackle illicit finance. These are opportunities that must be seized by the anti-corruption movement – which is increasingly vocal and organised – to ensure that the next few years see significant strides towards a better future.

What Spotlight on Corruption brings to the anti-corruption movement

Spotlight on Corruption is a highly credible, influential and expert voice on tackling the UK's role in corruption and corruption within the UK. We are rigorous in our research, innovative in our policy making and strategic in seeking to get policy reform.

In particular:

- We ask the hard questions, get to the bottom of the problem by engaging with a wide range of experts and frontline staff, and act as policy entrepreneurs to come up with ambitious but pragmatic solutions.
- We are not afraid to speak truth to power and to challenge decision-makers to go further and live up to their commitments.
- We act as a critical friend to law enforcement bodies, regulators, and those inside the government and the private sector who are committed to tackling corruption.

Our specialist expertise is in how the UK's anti-corruption laws are enforced and whether anti-corruption policies are working in practice. Our unique court monitoring programme tracks corruption cases through the UK courts, to analyse whether the laws are working, and how law enforcement is using them. Whether it is overseas and domestic bribery prosecutions, civil recovery of corrupt assets, or challenges to sanctions designations, our team closely follows the

big cases as they unfold, often present in court to hear evidence first-hand and gather court documents.

Our tenacious advocacy turns our research and analysis into compelling arguments for change. We provide expert and informed briefings to parliamentarians, decision-makers and the public and work with stakeholders to make sure that the UK's laws keep pace with economic and financial crime.

What is Spotlight on Corruption's track record?

Our small, tenacious, driven and highly collaborative team has consistently had an outsized impact on pushing for anti-corruption reforms.

Our impact has included playing a significant role in:

- getting a major rewrite of UK corporate liability rules,
- closing the UK's golden visa regime,
- ensuring there are powers that enable unlimited fines in the legal sector for breaches of anti-money laundering rules,
- putting Know Your Donor rules on the agenda as part of the government's electoral reform,
- securing major open justice precedents in the courts to promote greater transparency, and
- fostering high level political will for an international summit in the UK on countering illicit finance.

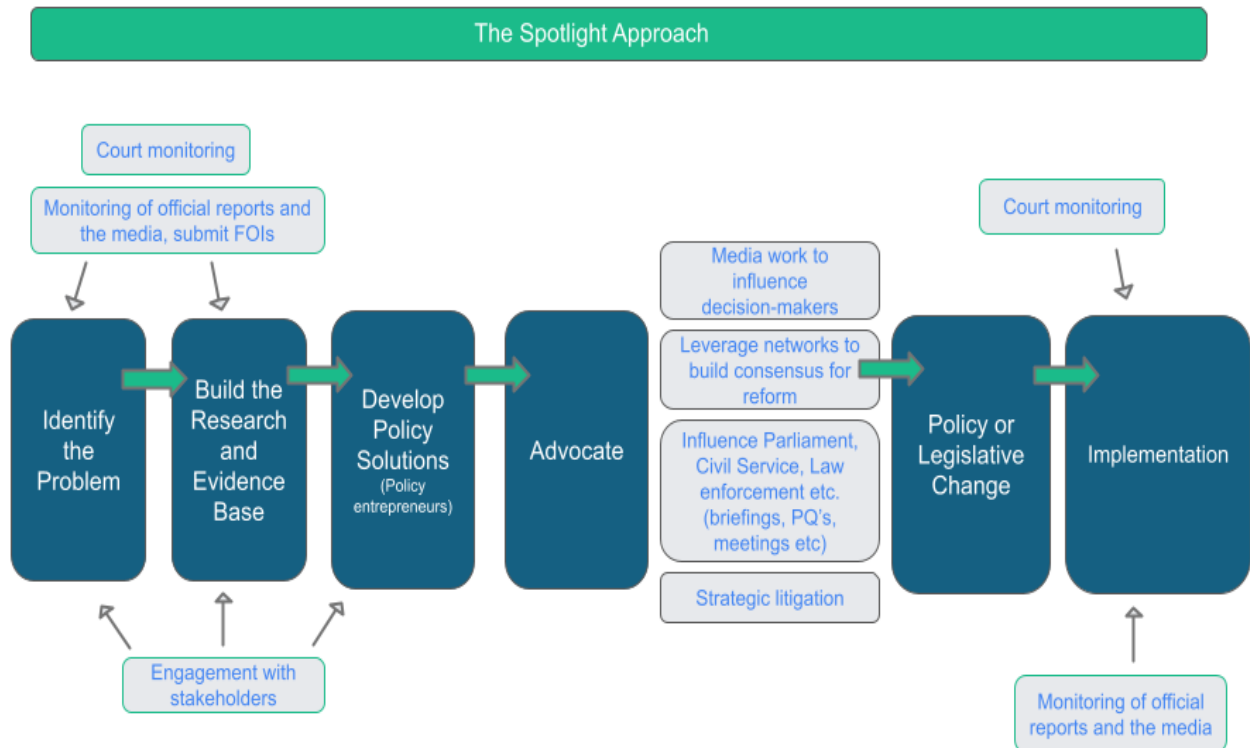
Our work is frequently cited in Parliament and our commentary often features in the media. We are a 'go to' organisation for informed, evidence-based and bold analysis.

How we work

Spotlight on Corruption seeks to be a bold, brave voice that pushes forward the anti-corruption agenda in a pragmatic, credible and evidence-based way.

We work in an agile and opportunistic way to seize political opportunities while also doing the long hard work of building the evidence base through our court monitoring, enforcement tracking and monitoring of implementation and progress on anti-corruption policies.

We strongly believe in the power of collaboration to ensure that the collective voice of the anti-corruption movement is bigger than the sum of its parts. And we act as convenors, bringing together frontline staff, with experts particularly in the legal sector, and civil society to forge consensus for reform.



Our three-year plan

Over the course of this plan, Spotlight will organise its work in two broad campaigns:

- A. Ending Impunity for Corruption
- B. Defending Democracy

Ending Impunity for Corruption

Our Ending Impunity campaign will focus on ending the UK's role as an enabler of global corruption and illicit finance, in particular by ensuring corrupt actors and those who enable them are held to account and that the harms of corruption are redressed.

This campaign will seek to deepen our partnerships with Global South civil society organisations and media, while building political will at home to tackle corruption and illicit finance, and act as a global anti-corruption leader. We will seek stronger enforcement by properly empowered and resourced enforcement agencies, more effective supervision to prevent money laundering, and more ambitious use of anti-corruption sanctions.

This campaign will also focus on strengthening accountability for those that seek to assist corrupt actors evade scrutiny through the use of Strategic Lawsuits against Public Participation (SLAPPs). And during this three-year plan we will also work more closely on green accountability, which undermines a fair transition and effective climate change programmes.

Ending Impunity Theory of Change

Activities	3 Year Outcomes	Long Term Outcomes	GOAL
Research, evidence and enforcement monitoring: - Court monitoring of courts and tribunals - Enforcement tracker - Policy research - Global south voices and partnerships	1. The UK government shows strong global leadership and the Anti-Corruption Champion leads implementation of an ambitious Anti-Corruption Strategy	1. There is political will to hold corrupt actors to account	Corrupt actors and those who enable them are held to account and harms are redressed
Targeted Media work to influence policy makers	2. Enforcement bodies have long-term funding with enhanced tools and more effective frameworks for holding corrupt actors to account and recovering assets	2. Enforcement bodies are properly empowered, resourced and effective	
Advocacy and direct influencing: - Parliamentary engagement - Engagement with civil servants, A-C Champion, enforcement bodies, regulators etc. - Submissions to regulators, agencies and government e.g. sanctions	3. Stronger Global South partnerships increase pressure for the ambitious use of sanctions and meaningful redress for corruption	3. There is accountability and redress for the harms of corruption	
Coalition building, convening and collaboration e.g. roundtables	4. There are stronger safeguards and accountability for green corruption	4. Strong safeguards against corruption protect the integrity of the climate transition	
Utilise Strategic Litigation	5. There is more effective AML supervision and robust enforcement against enablers, with stronger ethical standards in the legal profession	5. Enablers are held to account for their role in dirty money	
	6. Stronger safeguards against SLAPPs and accountability for key enabling industries.	6. The public, civil society and journalists are empowered to scrutinise and expose corruption	

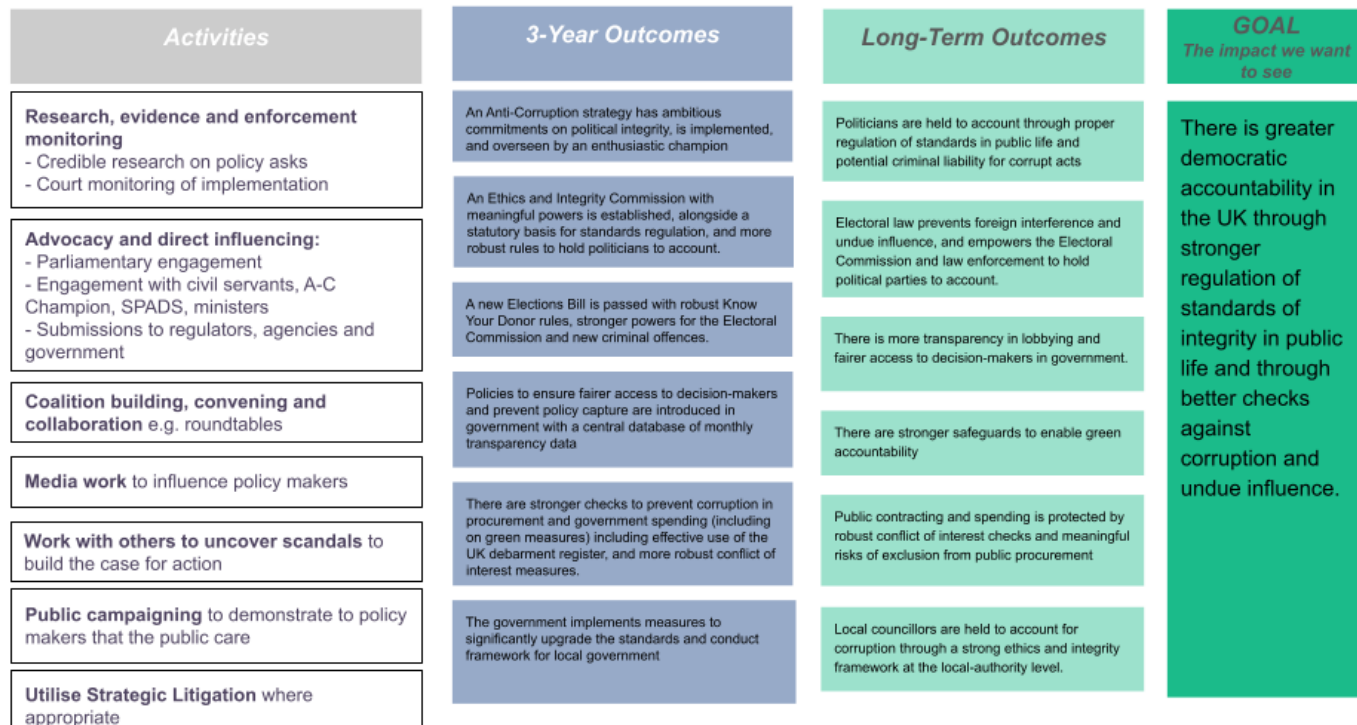
Defending Democracy

Our Defending Democracy campaign will focus on tackling corruption within the UK. We will push for enhanced political integrity and accountability mechanisms, as well as more transparency about, and fairer access to, decision-makers who set the rules of the game.

Ensuring public funds are spent with integrity, we will also work to ensure stronger preventative and accountability mechanisms in procurement. This will be particularly important in the context of increased investment in infrastructure for growth and to achieve net zero.

And we will work for stronger measures to protect the integrity of the UK's elections, and our political finance rules.

Defending Democracy Theory of Change



Spotlight's organisational development

Over the next three years Spotlight will:

- 1. Communicate our messages and our work more effectively and authoritatively.**
 Spotlight will make strides in getting its messages across to a wider range of audiences, including our impact to potential funders. We will develop a more compelling offer for broadcast media, including a pool of spokespeople, while continuing to ensure that the person with the expertise communicates the message. We will also scope a targeted public campaign to assist in achieving policy objectives while raising Spotlight's profile.
- 2. Invest in our staff, while increasing the size of the staff 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 maintain an exceptional team working environment as the team expands, including introducing more opportunities for in-person working. 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.

- 3. Develop our financial functions.** As Spotlight grows, we will continue to develop our financial structures to ensure that our financial governance, policies, and processes run smoothly and efficiently. This will reduce the strain on our staff, ensure our Board can deliver good oversight and financial governance, and ensure we can effectively monitor our impact and report to funders.
- 4. Maintain organisational sustainability.** Spotlight will develop our fundraising, including creating new relationships, to ensure our sustainability as an organisation as we grow. We will create a new staff role to lead on Fundraising, with help from other staff and the Board.
- 5. Commit to enhancing diversity, equality and inclusion across our work.**
Spotlight will embed a diversity, equality and inclusion policy and action plan across all its work, from recruitment, to Board composition, to external work that we do.
- 6. 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, evaluate the success of our theories of change, and to learn from our mistakes and successes to enhance our work. We will make greater strides in communicating our impact, and the lessons we have learned.