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RE: Thirteenth meeting of the Working Group on the Prevention of Corruption

Dear Secretariat,

The UK is committed to actively engaging with the UNODC and is glad to outline the UK's progress in the implementation of the UNCAC and UNGASS ahead of the thirteenth meeting of the Working Group on the Prevention of Corruption.

We would like to thank you for the comprehensive guidance note which has proved an invaluable tool in preparing our feedback.

We look forward to the convening of the Working Group in June.

Kind regards,



Andrew Preston
Head of the Joint Anti-Corruption Unit

Information requested from States parties in relation to promoting the use of information and communications technologies (ICT) for the implementation of the Convention.

Article 9. Public procurement and Management of Public Finances

Reducing corruption in public procurement and grants is a priority area for the UK. Effectively utilising online platforms for the management of public finances helps ensure better use of taxpayer money to deliver better services and ensure greater public confidence in our institutions. The UK does not require technical assistance in the implementation of article 9.

Examples of the use of ICT for the implementation of the Convention:

- Central government contracting authorities in England, and those in Wales and Northern Ireland that exercise wholly or mainly reserved functions for procurements, have to publish contracts above £10,000, and sub central contracting authorities in England, and those in Wales and Northern Ireland that exercise wholly or mainly reserved functions for procurements and NHS Trusts above £25,000
<https://www.contractsfinder.service.gov.uk/Search>.
- Contract registers are available online:
<http://www.londoncouncils.gov.uk/who-we-are/committees-and-networks/london-councils-capital-ambition-programme/about-capital-ambiti-1>.
- The Budget is a statement made to the House of Commons by the Chancellor of the Exchequer in November each year, on the nation's finances and the Government's proposals for changes to taxation. It is published after the Chancellor has made the announcements and is available online <https://www.gov.uk/government/publications/budget-2021-documents>.
- The government financial reporting manual (FReM) is the technical accounting guide for the preparation of financial statements. It complements guidance on the handling of public funds published separately by the relevant authorities in England and Wales, Scotland and Northern Ireland. In addition to the FReM, HM Treasury provides illustrative financial statements and supporting guidance on accounting matters helpful to those preparing financial statements
<https://www.gov.uk/government/publications/government-financial-reporting-manual-2022-23>.
- Guidance is published and disseminated by Cabinet Office to assist procurers to identify and tackle corruption:
<https://www.gov.uk/government/publications/procurement-policy-note-0119-applying-exclusions-in-public-procurement-managing-conflicts-of-interest-and-whistleblowing>.
- NHS Counter Fraud Authority successfully issues guidance for NHS

bodies about curbing procurement fraud and corruption, including specific new guidance for the pandemic era <https://cfa.nhs.uk/fraud-prevention/fraud-guidance>.

- A number of practical tools are available online to those working in public procurement:
 - Local authority SOC audit toolkit – [available on LGA website](#)
 - Cabinet Office Counter fraud function – [Covid 19 fraud response](#)
 - LGA/CIPFA – [Procurement and supply chain fraud guide](#)

Article 10. Public Reporting

The UK is a world leader in the publication of open data. Since 2010, the UK has significantly increased transparency on the workings of government, making full use of online platforms and portals to enhance transparency in public administration and make clear the standards which apply to public life. The UK does not require technical assistance in the implementation of article 10.

Examples of the use of ICT for the implementation of the Convention:

- The Information Commissioner's Office (ICO) <https://ico.org.uk/> upholds information rights in the public interest, promoting openness by public bodies and data privacy for individuals. Among its actions the ICO:
 - Keeps a register of data controllers <https://ico.org.uk/about-the-ico/what-we-do/register-of-data-controllers/> which includes details of organisations that process personal data.
- The Office of the Registrar of Consultant Lobbyists was set up following the Transparency of Lobbying, Non-Party Campaigning and Trade Union Administration Act 2014, in order to create and administer the statutory Register of Consultant Lobbyists https://registerofconsultantlobbyists.force.com/CLR_Search.
- Information about the Freedom of Information Act and details on how to make a request for information can be found on: The Information Commissioner's website <https://ico.org.uk/for-the-public/official-information/>.
- The Cabinet Manual, which acts as a guide to the laws, conventions and rules on the operations of Government. <https://www.gov.uk/government/publications/cabinet-manual>.
- The list of Cabinet Committees, which sets out the various sub committees of Cabinet and their membership. Both Cabinet and Cabinet Committees are made up of groups of Ministers that can take decisions that are binding across Government. <https://www.gov.uk/government/publications/the-cabinet-committees-system-and-list-of-cabinet-committees>.

- The List of Ministerial Responsibilities update regularly - it sets out the Ministers in each Government Department with a summary of their portfolios <https://www.gov.uk/government/publications/government-ministers-and-responsibilities>.
- List of Ministers' Interests: <https://www.gov.uk/government/publications/list-of-ministers-interests>
Summary details of Ministerial and Special Adviser meetings with external organisations, any gifts and hospitality received and details of overseas travel are published on a quarterly basis.
- The audited Annual Reports and Accounts of each Government Department are presented to Parliament each year. These present a true and fair view of the Department's aims, activities, functions and performance. <https://www.gov.uk/government/collections/cabinet-office-annual-reports-and-accounts> (This is an example from the Cabinet Office, other departments also available via Gov.uk).
- The accounting officer systems statement sets out all of the accountability relationships and processes within all central government departments, making clear who is accountable for what at all levels of the system. <https://www.gov.uk/government/collections/accounting-officer-system-statements>.
- Quarterly transparency releases for Ministers and Special Advisers can be found via Gov.uk: <https://www.gov.uk/government/collections/ministers-transparency-publications> (this is an example for Cabinet Office. Other departments also available via Gov.uk).
- The UK publishes information on fraud in the tax <https://www.gov.uk/government/statistics/measuring-tax-gaps> and welfare system <https://www.gov.uk/government/collections/fraud-and-error-in-the-benefit-system>.
- The data released by the UK includes: central government contracts over £10,000 <https://www.gov.uk/government/publications/open-contracting>, details of gifts and hospitality to Ministers and senior officials, and the beneficial owners of UK companies in the 'People with Significant Control Register' <https://www.gov.uk/government/news/people-with-significant-control-companies-house-register-goes-live>.

Article 13. Participation of Society

The UK places a high priority on the importance of media freedom and the critical role that investigative journalism plays in educating and alerting people to corruption and bringing to light issues of corruption which need addressing. We believe it is only through listening to and working with the media and civil society that we can take positive steps towards tackling corruption and identifying and driving further reform. The UK does not require technical assistance in the implementation of article 13.

Examples of the use of ICT for the implementation of the Convention:

- The UK is a founding member of the Open Government Partnership, and is currently implementing its fifth National Action Plan covering the period from March 2021 to 2023: <https://www.gov.uk/government/publications/uk-national-action-plan-for-open-government-2021-2023/uk-national-action-plan-for-open-government-2021-2023>.
- The UK has released over 40,000 datasets as open data. This is available on data.gov.uk <https://data.gov.uk/> for the public to access and use.
- The Police offer an online reporting website Police.uk <https://www.police.uk/pu/contact-the-police/report-a-crime-incident/>
- The SFO is a specialist investigating and prosecuting authority tackling the top level of serious or complex fraud and bribery and corruption. The SFO has a 'public facing' on-line reporting tool that can be accessed through its website <https://www.sfo.gov.uk/>. This portal allows individuals and legal representatives for corporate clients to directly report allegations of fraud, bribery and corruption.
- Members of the public or whistleblowers can report instances of bribery and corruption through the National Crime Agency (NCA) communication@nca.gov.uk.
- The UK keeps an updated online register of prescribed people and bodies. This ensures that if an individual decides to blow the whistle to a prescribed person rather than their employer, they choose the correct person or body related to their issue <https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2/whistleblowing-list-of-prescribed-people-and-bodies>
- The UK publishes information on government consultations <https://www.gov.uk/search/policy-papers-and-consultations>
- Local government consultations can also be found online <https://www.gov.uk/find-local-consultations>.

Information requested from States parties in relation to challenges to and good practices in anti-corruption awareness-raising, education, training and research (article 13, 1 (c)).

Since the introduction of the UK Anti-Corruption Strategy, the UK has worked to strengthen our understanding of corruption and encourage UK public institutions to use data and evidence to identify corruption risks and take targeted and proportionate measures against them. The UK does not require technical assistance in the implementation of article 13(1)(C).

Examples of implementation:

- In 2020 the Joint Anti-Corruption Unit (JACU) within the Home Office commissioned an economic crime business survey. The goal of the survey was to develop a clearer picture of domestic corruption in specific areas. JACU surveyed 5,000 people across sectors of interest and risk of corruption. The results of the survey were delivered in summer of 2020 and the Home Office is drafting a research paper to reflect the results that will be published in 2022.
- In 2020 JACU commissioned deep dive research projects to develop a conceptual framework for corruption specific sectors of risk and interest. The research will also produce a deeper understanding of corruption by conducting expert interviews from across sectors to better understand the risks of corruption. This work will also produce suggestions for a framework of a UK research strategy
- The NCA reviews the corruption threat in relation to serious and organised crime as part of the annual NCA Nation Strategic Assessment of Serious and Organised Crime (SOC). In 2020, the review had a focus on understanding the scale of corruption and identified that corruption is a key enabler of other SOC threats.
- The Office of national statistics regularly publishes the number of corruption related offences that have been reported to the police. The latest figures can be found on ons.gov.uk.
- In 2020, the Digital Policing Portfolio began devising an initiative to provide a reporting mechanism for allegations of bribery and corruption. A prototype has been designed, with full implementation expected in 2022.
- From 2018/19 Grants data across all UK grant-administering departments have been released to the 360Giving data standard, a recognised format for data of this nature, allowing new levels of analysis and public oversight.
- The UK has submitted its first voluntary report on UN Sustainable Development Goal targets 16.4 and 16.5 (which include commitments to reduce illegal financial flows and to reduce corruption and bribery https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/816887/UK-Voluntary-National-Review-2019.pdf).
- Training and resources that improve the awareness and understanding of corruption amongst UK embassy staff are being delivered by the FCDO via its Diplomatic Academy and online material.
- The UK is committed to assign a senior lead in every central government department for bribery and corruption, who is a trained and qualified member of the Civil Service Counter Fraud Profession. In 2020 the standards, guidance and outline training programme for the leads was developed.
- Counter Fraud, bribery and corruption awareness training (e-learning) is available to all public sector staff who use Civil Service training. It provides

general awareness and understanding of the risks and issues relating to bribery and corruption.

- A counter bribery and corruption training programme has been delivered to law enforcement through the City of London Police Learning Programme.

Information requested from States parties in relation to achieving the commitments regarding corruption prevention from the UNGASS political declaration.

The UK approach to preventing corruption includes building a strong legal framework to deter and punish corrupt practices, providing access to preventative tools, increasing transparency measures, and providing access to education and training. The UK does not require technical assistance in the implementation of paragraphs 1 to 22 of the UNGASS political declaration.

Examples of the implementation of paragraphs 1 to 22 of the UNGASS political declaration:

- Published in December 2017, the UK Strategy <https://www.gov.uk/government/publications/uk-anti-corruption-strategy-2017-to-2022> established an ambitious longer-term framework to guide UK government efforts to tackle corruption at home and abroad in the period to 2022. The UK is currently developing the successor to the Anti-Corruption Strategy.
- The UK publishes annual updates on the implementation of the Strategy. The Year three Update can be found here <https://www.gov.uk/government/publications/anti-corruption-strategy-year-3-update>.
- Each central government entity, including departments, agencies, trading funds, non-departmental public bodies and arm's length bodies, has a strong and transparent corporate governance framework which includes a single accounting officer; internal and external audit processes; risk and audit an audit committee; and a management board including independent members.
- Central government entities must publish an audited combined Annual Report and accounts each financial year which presents a true and fair view of income, expenditure, assets, liabilities and asset management strategy.
- The Chancellor of the Exchequer presents the annual national Budget to parliament each year, covering the nation's finances, Government proposals for changes to taxation and forecasts for the economy by the Office for Budget Responsibility (OBR). The Budget is published online and measures are contained in the annual Finance Bill which Parliament debates and scrutinises.

- Local authorities are required to publish the number of occasions that they use powers under the Prevention of Social Housing Fraud Regulations or similar powers, the total number of employees undergoing investigations and prosecutions of fraud, the total number of professionally accredited counter fraud specialists, the total amount spent by the authority on the investigation and prosecution of fraud, and the total number of fraud cases investigated. This requirement is within the Local Government Transparency Code enforced by the Local Government Regulations 2015. Here is an example: <http://www.kent.gov.uk/about-the-council/finance-and-budget/spending/fraud-prevention>.
- The Nolan principles of Public Life <https://www.gov.uk/government/publications/the-7-principles-of-public-life> define the ethical standards expected of public office holders. Published codes of conduct set out the standards expected of Ministers, special advisers and civil servants, and they are also subject to extensive transparency requirements.
- The Civil Service Commission, Committee on Standards in Public Life, Ombudsmen, the Advisory Committee on Business Appointments, and the Cabinet Office all play a role in ensuring the UK government maintains the highest standards of integrity in all areas.
- UK organisations have strong systems which facilitate effective management and control. For the private sector this includes the UK Corporate Governance Code <https://www.frc.org.uk/getattachment/88bd8c45-50ea-4841-95b0-d2f4f48069a2/2018-UK-Corporate-Governance-Code-FINAL.pdf> for the largest listed companies as well as high standards for corporate reporting and audit, which encourage companies to have strong financial controls and make it harder to disguise illicit activity.
- The UK has established a public central register of beneficial ownership information <https://www.gov.uk/government/news/people-with-significant-control-companies-house-register-goes-live>.
- The UK is introducing a 'Register of Overseas Entities' to crack down on foreign criminals using UK property to launder money [Fact sheet: The Register of Overseas Entities \(web accessible\) - GOV.UK \(www.gov.uk\)](#)
- The Criminal Finances Act which establishes anti-corruption tools and powers such as Unexplained Wealth Orders <https://www.gov.uk/government/collections/criminal-finances-act-2017> and <http://www.legislation.gov.uk/ukpga/2017/22/contents/enacted> it builds on the Proceeds of Crime Act 2002 <https://www.legislation.gov.uk/ukpga/2002/29/> to create a strong legal framework to deter corruption.
- The National Audit Office scrutinises public spending for Parliament and is independent of government and the civil service. The NAO audits the financial accounts of departments and other public bodies, and

examines and reports on value for money in public spending

<https://www.nao.org.uk>.

- The NCA are participants of the International Anti-Corruption Coordination Centre (IACCC) <https://www.nationalcrimeagency.gov.uk/what-we-do/crime-threats/bribery-corruption-and-sanctions-evasion/international-anti-corruption-centre>
- The UK regularly publishes government transparency data and the 2002 Freedom of Information Act <https://www.legislation.gov.uk/ukpga/2000/36/> guarantees access to government data for citizens.